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North Dorset Local Plan – 2011 to 2026 Part 1

Pre-submission Focused Changes Consultation

1 August to 12 September 2014

Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012

Response Form

For each representation you wish to make a separate response form will need to be completed.

This is a formal consultation on the legal compliance and soundness of the Local Plan as amended by focused changes, before it is submitted to the Secretary of State for examination by an Inspector. For advice on how to respond to the consultation and fill in this form please see the 'Guidance Notes for Making Representations' that can be found on the Council's website at

www.dorsetforyou.com/focusedchangesconsultation/north

Please return completed forms to:

Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

Alternatively you can submit your comments online at:

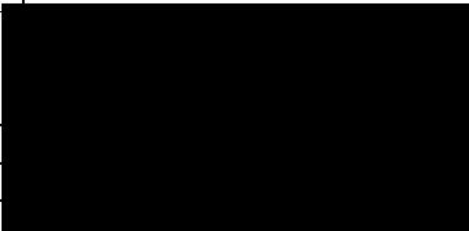
www.surveymonkey.com/s/NorthDorsetLocalPlanFocusedChangesConsultation

Deadline: 11:59 p m on 12 September 2014. Representations received after this time may 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**. Representations cannot be treated in confidence as Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. By submitting this response form you consent to your information being disclosed to third parties for this purpose, but signatures, private telephone numbers and e-mail addresses or private addresses will not be visible on our web site, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

*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.

Personal Details (if applicable)*		Agent's Details (if applicable)*
Title		Mr
First Name		Neil
Last Name		Hall
Job Title(<i>where relevant</i>)		Director
Organisation (<i>where relevant</i>)	The Crown Estate	AMEC
Address	C/O Agent	
Postcode		
Tel. No.		
Email Address		

Part B – Representation

The Focused Changes to the North Dorset Local Plan 2011 to 2026 Part 1 and its supporting documents have been published in order for representations to be made prior to submission to the Secretary of State for examination. The purpose of the examination is to consider whether the Local Plan as amended by focused changes, complies with the **legal requirements** and is **'sound'**.

If you are seeking to make a representation on the **way** in which the focused changes have been prepared it is likely that your comments or objections will relate to a matter of **legal compliance**.

If you are seeking to make representations on the **content** of the focused changes it is likely that your comments or objections relate to the **soundness** of the plan and whether it is justified, effective or consistent with national policy.

Further information on the matter of legal compliance and the issue of soundness can be found in the 'Guidance Notes for Making Representations'.

If you need help completing the response form please see a member of the Planning Policy Team at the consultation exhibition in Blandford Forum on 14 August 2014 or call 01258 484201.

1. Please select which document you are commenting on:

- North Dorset Local Plan 2011 to 2026 Part 1: Pre- Submission Focused Changes (please complete Questions 2 to 9)
- Supplement to the Sustainability Appraisal Report (please complete Questions 2 and 10)

2. Please state to which pre-submission focused change you are commenting on:

Change Reference:	Section reference:
MAJ/16/1 and MAJ/16/2	

3. Do you consider the Local Plan as amended by focused changes, to be legally compliant and prepared in accordance with the Duty to Cooperate, legal and procedural requirements?

- Yes No

4. Do you consider the Local Plan as amended by focused changes, to be 'sound'?

- Yes No

5. If you consider the Local Plan as amended by focused changes, to be unsound please specify your reason(s) by ticking the box(es) that apply below

- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy

6. Please give specific details of why you consider the Local Plan as amended by focused changes, has not been prepared in accordance with the Duty to Co-operate, legal or procedural requirement or why you consider the plan to be unsound. Alternatively, if you wish to support any aspects of the plan please also use this box to set out your comments.

The Crown Estate objects to proposed changes MAJ/16/1 and MAJ/16/2. It is not considered that these changes meet the tests of soundness set out in NPPF. See the attached document for further information.

Continue on a separate sheet if necessary

7. What change(s) do you consider are necessary to ensure that the Local Plan is legally compliant and sound? It would be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is considered that in order to meet the tests of soundness set out in NPPF particularly justified and consistency with national policy, that proposed changes MAJ/16/1 and MAJ/16/2 should be rejected. The Council could add reference to heritage impacts in Policy 16 to overcome objections on heritage grounds. Suggested alternative wording is provided below:

Meeting Housing Needs

..... In addition to infilling and redevelopment within the settlement boundary, Blandford's housing needs will be met through:

g mixed use regeneration of the Brewery site; and

h the development of land to the west of Blandford Forum. The scale, form and nature of development needs to be informed by a comprehensive masterplan/heritage/landscape assessment; and

i the development of land to the west of Blandford St Mary.

Infrastructure

..... New or improved facilities will include:

w informal open space at Crown Meadows associated with housing development to the west of Blandford Forum; and
x new sports pitches and associated facilities on land within the built up area of Blandford.

Continue on a separate sheet if necessary

8. If your representation is seeking a change to the Local Plan as amended by the focused changes, do you consider it necessary to participate in the oral part of the examination?

- No, I do not wish to participate in the oral examination
- Yes, I would like to participate in the oral examination

9. If you wish to participate in the oral part of the examination please outline why you consider that to be necessary. Please note that the Inspector determines who is heard at the examination.

As a significant landowner in Blandford Forum, it is essential that The Crown Estate participates in the examination.

10. Please outline your comments on the Supplement to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment. Comments are not confined to 'soundness' issues, but respondents can express their opinions on the above documents and use it as a reference point on the 'soundness' of the Local Plan.

See attached comments.

11. Do you wish to be notified of any of the following? Please tick all that apply. We will contact you using the details you have given above.

- That the Local Plan Part 1, as amended by the Focused Changes, has been submitted for independent examination
- The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1
- The adoption of the Local Plan Part 1.

Signature: Neil Hall

Date: 12 September 2014

If submitting the form electronically, no signature is required.

North Dorset Local Plan Part 1

Pre-submission Focussed Changes Consultation September 2014

Response form continued on behalf of The Crown Estate

Change references MAJ/16/1 and MAJ/16/2 – Deletion of housing growth at West Blandford and identification of new direction for growth at South East Blandford St Mary

Summary

The Crown Estate **OBJECTS** to proposed changes MAJ/16/1 and MAJ/16/2 which propose the deletion of housing growth at West Blandford and its replacement with a site at the A350/A354 junction south east of Blandford St Mary. The Crown Estate does not consider that the proposed changes are fully justified or meet the tests of soundness set out in NPPF for the reasons set out below:

1. **Deletion of West Blandford is not justified on heritage grounds:** We question the conclusions of the Council's assessment. It has not been adequately demonstrated that development at West Blandford would result in change that would meet the 'high test' of substantial harm. The Council's assessment is inconsistent in its approach. Whilst the baseline describes the area in which the site is located as an urban fringe, being one of medium sensitivity, the assessment incorrectly considers it as comprising an area of open and undeveloped landscape and being highly sensitive. These inconsistencies undermine the conclusions of the report as it fails to demonstrate that significant harm would be caused to heritage assets.
2. **No consideration of reasonable alternatives:** The heritage assessment has considered a specific scheme that is not proposed by the Council. There is no evidence that there has been any consideration of alternative options including reducing the scale of development at West Blandford or making up any shortfall on other sites proposed for allocation.
3. **The revised Sustainability Assessment does not provide an objective assessment:** The revised Sustainability appraisal (SA) appears written to 'fit' the revised plan rather than informing it. A re-worked SA shows that the West Blandford site out performs the A350/A354 junction site and should not be de-allocated. Consequential changes to Policy 16 have also been made to fit/justify the revised strategy.
4. **The approach is not justified or supported by national policy:** The assessment is solely based on heritage factors. Wider sustainability factors of the West Blandford site need to be balanced against the heritage considerations. Factors such as sustainability, transport and accessibility, support for the town centre (including the historic core of the town) should be weighed in favour of the site.

Overall, The Crown Estate considers that the Council's heritage assessment has not demonstrated that heritage considerations are so significant they would outweigh the benefits of sustainable development at West Blandford to support the site's proposed de-allocation. Heritage concerns could be addressed through revised wording to Policy 16 that require any

proposed scheme to give particular recognition to the historic environment. Other mitigation and enhancement measures could also have been considered as part of the assessment process.

Further detail on each of the four points above is provided in the remainder of the document.

1. Deletion of West Blandford not justified on heritage grounds

The emphasis of the NPPF is to ensure that all policies are underpinned by sufficient evidence to ensure their soundness (paragraph 182). The four tests of soundness include the test of justified “the plan should be the most appropriate strategy, when considered against reasonable alternatives, based on proportionate evidence” (emphasis added).

The Council’s heritage assessment to support the focussed changes to the Plan states that development within the West Blandford site would result in substantial harm to a number of designated heritage assets in Blandford:

- Conservation Area;
- WWII listed structures; and
- Bryanston Cottage.

The Crown Estate has shared a significant amount of technical work with the Council to demonstrate that the site at West Blandford is deliverable. This has included work on heritage implications and protecting the landscape setting of the town. The Crown Estate also has a number of concerns regarding the Council’s assessment. Accordingly, The Crown Estate does not feel that this proposed change is based on a sound evidence base and therefore fails the test of justified. The reasons for this are set out below dealing with the three main reasons for the site’s proposed deletion as listed above.

Before considering the potential impacts of development at West Blandford, it is important to consider what is meant by ‘substantial’ harm.

‘Substantial’ harm is referenced in NPPF paragraph 132 which states that:

“Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional. ”

What may constitute substantial harm is not defined in the Annex to the NPPF or the accompanying technical guidance. However, it is referred to in the Planning Practice Guidance¹ which states that:

“Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm

¹ <http://planningguidance.planningportal.gov.uk/blog/guidance/conserving-and-enhancing-the-historic-environment/> (accessed 7/7/14)

to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting."

The judgment on whether a development would result in substantial harm is therefore a matter of degree, but it is described as a high test and must relate to key aspects that support the heritage significance of an asset.

The matter of what would constitute substantial harm has also been considered in a number of planning appeal decisions, which have confirmed it as high test. For example, in the decision on a wind farm appeal at Land at Airfield Farm, Podington (13 August 2012, Appeal Ref: APP/K0235/A/09/2108506), the inspector concluded that:

"There is no specific guidance as to the level at which harm might become substantial but on a fair reading, it is clear that the author(s) must have regarded substantial harm as something approaching demolition or destruction."

In cases of harm resulting only from changes to the setting of an asset (i.e. where there will be no physical change to the asset itself), this implies that there would be a profound harm to elements of setting which are essential in supporting the heritage significance of the asset.

Impact on the Conversation Area

The North Dorset District-Wide Local Plan to 2011 identifies nine sub-areas of the Blandford, Blandford St Mary and Bryanston Conservation Area. The Council's assessment considers the effects on one of these sub-areas as a result of the development would be significant (River Stour Meadows). However, in carrying out the assessment there appears to be a disparity between the Council's assessment of the current sensitivity of the River Stour Meadows sub-area and the assessment of the significance of potential effects.

In describing the baseline situation for this sub-area the Council's assessment states at paragraphs 7.222 to 7.224 (emphasis added):

*"The northern part of the sub-area has more the character of an **urban fringe**. It is influenced by a number of urban elements and uses, including modern residential properties on Parklands, Hanover Court and Portman Place, the Deer Park Stables and buildings related to the stables. The eastern bank of the River Stour in this northern part is lined with rows of tall trees which screen many of the heritage assets at Bryanston from the **unsympathetic urban edge**.*

*The northern part of Sub-Area VIII also adjoins Sub-Area V: The Milldown Road, which includes areas of more recent **residential development and the dominating buildings and sports fields associated with the Blandford School and Leisure Centre**.*

The north part of Sub-Area VIII has experienced and will continue to experience development on adjacent land, especially in Sub-Area V, which will add to its characterisation as urban fringe. Within the last ten years, numerous new blocks and extensions have been approved at The Blandford School. The construction of a new synthetic sports pitch with fencing and floodlighting has been approved by Dorset County Council; this site lies immediately north of the Deer Park Stables. Also a new property (Lanrick House) was constructed on the edge of the Deer Park in 2005. The northern part of Sub-Area VIII has a

medium sensitivity to change which reflects both its urban fringe characterisation as well as its importance in long-distance views from Blandford Bridge and from Bryanston School.”

This clearly acknowledges the urban fringe character of this area and in particular notes the modern developments within and around the Blandford School. As a result of these factors, the area is described as being of medium sensitivity.

However, in assessing the impact of development within the site at paragraph 7.228 it is stated that:

“The proposed development is located within, and will bring about a significant modification to, Sub-Area VIII. Its open and undeveloped landscape means it is **highly sensitive** to any development. This area is integral to the setting of the historic core of the town and to the wider setting of many of the heritage assets in Blandford and Bryanston, including the Second World War defences. It is accepted that the northern part of Sub-Area VIII has been subject to urbanising encroachments; largely in the adjacent Sub-Area V. The expansion of development along Milldown Road and the building of the two schools dominate the views towards the town from Bryanston and the northern part of The Cliff. However, development would result in a noticeable urban encroachment towards the river and an infilling around the existing urban fringe.”

There is a clear contrast between these paragraphs. Whilst the baseline describes the area in which the site is located as an urban fringe, for the assessment it is considered as comprising an open and undeveloped landscape. Therefore, whilst the baseline considers it of medium sensitivity, for the assessment it is highly sensitive. Whilst the assessment has some acknowledgement of the previously described urban fringe development of this area, this appears to be dismissed and does not appear to have been taken account of in the assessment.

The Crown Estate agrees with the Council’s assessment of the current character of the area and the conclusion that it has a medium sensitivity to change. The River Stour Meadows sub-area comprises land between the built extent of Blandford Forum to the east and the River Stour to the west. It extends to approximately 34ha in area, though the total extent of the former Deer Park between the River Stour and west of Milldown Road (as shown on Tithe Map and historic OS maps) is approximately 57ha, all of which is within the conservation area.

The remaining 23ha is in use and occupied by large institutional buildings (schools), associated sports pitches (remaining essentially open but laid out as formal sports pitches with associated pavilions and fencing), housing and stables.

Much of the development is later twentieth or twenty first century in date, with some of the larger school buildings being built in the last few years. The site has been visually severed from the historic core of the town by insensitive development over recent decades. It has no visual or physical connection to the historic aspect of the town centre and its openness does not contribute to the setting of the conservation area given the surrounding urban influence and limited views in and out of the site from public vantage points.

Furthermore, recent developments have already led to an encroachment of the town southwards towards the river. A recent planning permission for an all weather sports pitch including associated fencing, earth works and flood lighting will have a profound effect on the character

of the conversation area which appears not to have been considered in the Council's assessment and were not subject to any objections from the District Council.

In this context, development in the northern part of the conservation sub area at West Blandford is appropriate to the current suburban character and also offers opportunities for improvement, particularly through repairing the settlement edge. Development would be framed between large scale utilitarian development at Blandford School (including the all weather pitch currently being built) and the adjacent 60/70s development at Parklands which provides a hard transition from the urban area to the rural hinterland.

The Crown Estate is sensitive to the impact a development at this location may have on the historic views of the town and has sought to test and protect important views within and out of the conservation area. For example, we have sought to minimise any impact on iconic views from Blandford Bridge testing and designing initial plans that protect these views. We have prepared verified photomontages. These demonstrate how little impact any development would have on important views from Blandford Bridge and would maintain the views along the river from the bridge. Views of the site from public vantage points are also limited. When viewed from The Cliff and Bryanston Church the site is seen within the context of the large utilitarian school buildings and the less than sympathetic edge provided by development at Parklands. Views of the site from White Cliff Mill Street and Milldown Road are also restricted by existing development and the topography of the land. With the site being lower than the level of public roads to the north, views of the Cliff would be maintained and there would be no discernible loss of openness. Many of these points are accepted in the Council's own assessment.

Development would effectively 'finish off' development on the western side of the town and can be integrated into the existing settlement pattern without harming the quality and character of the area or the openness of the river corridor. Further opportunities exist to restore the former parkland setting through the creation of the informal open space on Crown Meadows.

It is therefore difficult to see that substantial harm could be caused to the conservation area simply on the basis of the principle of development. It is within an area in which modern development is already present and dominates building character and offers significant potential for improvement. Overall, the Council's assessment has not demonstrated that the change would meet the 'high test' of substantial harm.

WWII listed structures and Bryanston Cottage

Elements of the WWII defences are Grade II listed, including a group of fifteen anti tank cubes to the south-east of Deer Park Holm (LB 1395723) and an anti-tank ditch with single anti-tank cube and pill-box to the rear of Park Lands and Bryanston Street (LB 1403075). There are also anti-tank cubes and dummy pill box along River Mews south of the Crown Hotel (LB 1403186), but these are some distance from the site and appear to face away to the south. A further pill box and cubes within the BT depot are not listed.

The Council's assessment concludes that there will be substantial harm to these defences, though it is not entirely clear exactly which elements of the defences this relates to. It is assumed that it does not include the anti-tank cubes south-east of Deer Park Holm, which are within a modern residential area, or those south of the Crown Hotel, which appear to face away from the site. There is clearly potential for an effect on the setting of the anti-tank ditch and pillbox. However, the defences have not been managed as a group and the settings of many have previously been affected by subsequent development.

There is currently limited public access to the defences. The indicative layout has sought to preserve elements of the setting of the defences, with gaps in the built form that would allow public access to the anti-tank ditch. Development layout can therefore respond to the setting of the structures, as well as promoting understanding of the asset and need not result in substantial harm.

The Council's assessment also concludes substantial harm would result on the setting of the Grade II listed Bryanston Cottage, to a large extent as a result of changes in view from The Cliff. Whilst it is questionable just how prominent this two storey domestic building is in views at a distance of at least 500m, the assessment also does not take account of the fact that the building is already seen alongside later twentieth century residential development. It is not likely that the whole of the Crown Meadows could be considered to contribute to the heritage significance of the asset and the extent of any change to its setting would be determined by the final layout of any development, and need not be substantial.

Therefore overall, given the current location and nature of development around the listed WWII structures and Bryanston Cottage, we do not agree with the Council's conclusions that development would result in significant harm to these assets. The initial concept drawings have already sought to protect the setting of these assets for example through the provision of sight lines through from the pill box and maintaining an open aspect adjacent to the curtilage with Bryanston Cottage. Nevertheless, the Council could have considered other reasonable alternatives and further design responses to mitigate any impact on these two assets. This could have included removing the arm of development which runs parallel to the anti-tank defence ditch thereby further protecting the setting of these assets.

2. No consideration of reasonable alternatives

The Council's assessment attempts to assess a specific scheme as if it were a planning application rather than drawing the reasonable conclusion that the site can accommodate development without substantial harm, the detail of which would need to be carefully considered through a robust masterplanning process. NPPF Paragraph 182 sets out the four tests for soundness against which local plans will be assessed. This includes the test of 'justified'. In order for the plan to meet this test the plan should make '*the most appropriate strategy when considered against other reasonable alternatives*'. Therefore to meet this test the Local Planning authority must demonstrate that consideration has been given to other reasonable alternatives to demonstrate that the submitted plan is adequately justified. The Crown Estate has a number of concerns in this respect and does not feel that the Council has considered alternative options or fully demonstrated that the proposed replacement of the West Blandford site under change MAJ/16/2 is sound.

Firstly, on a procedural point, Policy 2 of the pre-submission Local Plan Part 1 makes it clear that the settlement boundaries of the main towns (save for Gillingham) will not be amended until the Local Plan Part 2.

Whilst in our response to the Pre-submission Plan we raised concerns about this approach due to the potential impact on the Council's ability to respond to fluctuations in housing land supply, the approach means that the extent of development is not defined through the Local Plan Part 1. This therefore gives the Council ability to test further options through the Local Plan Part 2 process which will define amendments to settlement boundaries and the scale of allocations. The Council's assessment actually assesses a scheme that has not yet been proposed by the

Council and this assessment is therefore pre-determining the outcome of the Local Plan Part 2 process.

Secondly, it is believed that the Council could have considered other reasonable alternatives on the West Blandford site to mitigate any impact on built heritage. There is no evidence that the Council has considered any design responses to mitigating heritage impacts, including a smaller scale of development which addresses the heritage concerns.

The site was initially identified in the early stages of the Plan as being suitable for a development of 200 homes but was subsequently reduced to 150. We have undertaken detailed assessment and prepared a development option for the site to demonstrate how a development for around 150 homes could be accommodated at West Blandford whilst responding to technical work including heritage considerations. However, it must be stressed that whilst the concept is considered to have considerable coherence and much practical detail has been considered, the plan is not fixed, and remains as an illustration of one way that development could take place. Consideration could be given to alternatives including a further reduction in capacity informed by technical analysis as part of the Local Plan part 2 process. Options could include a smaller scale of development achieved for example through the removal of the arm of development which runs parallel to the anti-tank defence ditch (see above).

A smaller scale of development at West Blandford has potential to infill a section of the damaged settlement edge and would be framed between the large utilitarian school buildings and development at Parklands. Development in this location would effectively 'finish off' development on the western side of the town whilst also integrating into the existing settlement pattern without harming the quality and character of the area or the openness of the river corridor and protecting the heritage assets from substantial harm.

There is also no evidence that that Council has considered other alternatives to make up the shortfall in housing resulting from the deletion or reduction in scale of development at West Blandford for example through increased allocations on other identified sites, including those at West Blandford St Mary.

In the absence of a robust evidence base to demonstrate the consideration of reasonable alternatives, the document has not fully met the requirements of NPPF (paragraph 158). It is considered that had a more robust assessment of the options been undertaken, greater weight would have been given to allocating development in highly sustainable locations such as West Blandford (even if this included a reduced quantum of development to further address heritage issues).

3. Revised Sustainability Assessment does not provide an objective assessment

We have a number of concerns about the way in which alternative options have been considered through the revision to the SA. It is important that the SA is robust and is able to withstand scrutiny to justify the Council's preferred approach and assessment of other reasonable alternatives. Whilst it is recognised that the SA process is subject to a degree of professional judgement it is important that the SA deals with alternative options in a comparable manner to ensure the plan is fully justified.

The strategic sites around the four main towns have been subject to significant testing through the Local Plan Part 1 process and their identification is supported by an extensive evidence base produced by the Council and promoters of the strategic sites. The Crown Estate has shared a

significant amount of technical work with the Council to demonstrate that its site at West Blandford is suitable. However, it is considered that the Council's revised SA does not place sufficient weight on this evidence base in assessing the sites. In addition, the SA and additional heritage assessments only deal with two sites. The assessment does not therefore provide a holistic assessment of the Local Plan and tests proposals that are not being proposed by the Council at this point in time. We have a number of concerns about the revised SA and we feel that the Council's own evidence base suggests that the site at West Blandford performs better against the sustainability objectives than perceived in the Council's assessment. These concerns are highlighted in **Table 1** below where we suggest alternative scoring. We have identified where we feel the Council's SA score does not reflect the evidence and have suggested alternative scoring where appropriate which better reflects evidence based work and comments from statutory consultees. We are concerned that the assessments are being undertaken to fit the strategy rather than inform it.

An annotated version is provided in **Appendix 1** giving further explanation on our revised scoring. The table highlights a number of shortcomings in the Council's SA.

The A350/A354 junction site does not compare favourably in sustainability terms and its proposed allocation is not based on sound planning principles and would therefore undermine the soundness of the Local Plan. The site is outside the busy bypass and will never be as well connected or integrated with the existing town. Even if a bridge or subway option are affordable it will still not prevent the development of an essentially out of town and more car based development that is less accessible by walking and cycling. Proposals for the Spetisbury and Charlton Marshall by-pass (exact location to be established through the Local Plan Part 2 process) will essentially mean that the site would be framed between two major roads reinforcing this as a car based location. This would be counter to sustainable development objectives.

These concerns undermine the soundness of the Council's proposed change MAJ/16/2 as the site selection is not fully justified to meet the tests of soundness.

Table 1 - Suggested Alternative Sustainability Appraisal Scoring

Sustainability Objective		NDDC's revised score West Blandford	Proposed score West Blandford	NDDC's revised score Land at A340/ A354	Proposed score Land at A340/ A354
1	Provide housing that meets the needs of the community.	++	++	++	++
2	Create balanced communities where employment, housing and community needs are delivered to meet needs, improving access to essential services.	+	++	-	-
3	Improve the health and wellbeing of the population through reducing poverty and encouraging healthy lifestyles.	+	+	?	0
4	Reduce barriers to individuals participating in their community	+	+	-	-
5	Improve quality of life through well designed inclusive developments.	-	0	0	0
6	Reduce the impact of climate change, including flood risk and make best use of the opportunities that arise	-	+	0	0
7	Protect and where opportunities arise, enhance habitats and biodiversity	-	0	+	0
8	Improve the quality of the built environment and protect the District's heritage	-	-	-	+
9	Recognise the importance of the district's distinct rural landscape.	-	-	-	-
10	Reduce impacts on the environment	-	-	-	-
11	Reduce pressure on the district's natural resources	-	-	-	-
12	Promote energy and resource efficiency	+	+	+	+
13	Improve the competitiveness of the District's economy	0	+	+	-
14	Enable local needs to be met locally and encourage sustainable forms of transport	+	++	+	0
15	Encourage a business environment	0	+	0	0
16	Improve skills and work opportunities.	+	+	+	+

4. The approach is not justified or supported by national policy

The preferred allocations appear to be primarily based on heritage considerations. These considerations need to be balanced against the assessment of each of the alternative options in terms of their social, environmental and economic performance to meet the requirements for a holistic approach set out in NPPF. The officer's assessments of the two alternative options in the SA (see comments above) do not appear to have followed through to the recommended allocations.

Since the publication of NPPF in March 2012, the presumption in favour of sustainable development is a key material consideration which is described in the NPPF as a "golden thread running through both plan-making and decision-taking." Specifically in relation to plan-making, paragraph 14 of the NPPF states that this means that:

- *"Local planning* authorities should positively seek opportunities to meet the development needs of their area.
- Local Plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid changes, unless:
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted. "

The presumption in favour of sustainable development is therefore a significant consideration in the plan making process (NPPF, Paragraph 15). This states that "all plans should be based on and reflect upon the presumption in favour of sustainable development. "

In this context, NPPF makes it clear that the sustainable development merits of a plan should be assessed against the policies in the Framework taken as a whole. With the evidence being weighted on heritage issues, there is not sufficient evidence to suggest that the proposed change provides a holistic approach to meet the tests of soundness set out in NPPF.

As noted above, we do not agree with the Council's assertion that the site would result in substantial harm to heritage assets. We have demonstrated that any impacts that might result from the development can be mitigated (these issues could be fully explored at the Local Plan Part 2 stage).

The site provides a highly sustainable and deliverable location for development which can play an important role in delivering new high quality development in the town and supporting town centre businesses. It presents a logical and sustainable location for new housing provision and meets the tests of soundness set out in NPPF. Being within close proximity to the town centre and directly adjacent to the town's secondary school and a primary school, the site offers the best opportunity to deliver sustainable development. The site is acknowledged as being the most sustainable option available to the Council (North and North East Dorset Transport Study, March 2010).

Overall, it is considered that there are no significant adverse impacts that demonstrably outweigh the benefits as noted in our comments on the revised SA above. Therefore, the heritage considerations are not considered so significant to override wider sustainable development considerations.

Further to this, not only has there been no balancing exercise, but there has also been no application of the positive approach to heritage conservation set out in NPPF (paragraph 126).

Whilst the Council acknowledges the poor urban edge which is currently defined by large scale utilitarian development at Blandford School (including the all weather pitch) and the adjacent 60/70s development there has been no consideration of opportunities to enhance this area. These opportunities should be balanced in favour of the site. The Council's approach is contrary to that set out in NPPF (paragraph 137) which advises:

“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably. ”

Consequential changes to Pre-submission document

Figure 5.1 lists a number of consequential changes. There is a concern that some of these changes are being included to justify or fit the Council's proposed amendments to the plan. For example, change reference CON/16/1 amends Policy 16 stating that housing will be located in accessible locations, particularly those close to the town centre and 'other facilities'. This is clear evidence that the Council's previous focus on town centre locations is being diminished through changes which seek to fit the revised plan. The policy was originally drafted to ensure that development was located to have good access to the town centre and to provide support to town centre businesses. Revisions to Policy 16 dilute this policy objective and mean that the Local Plan has less potential to support town centre regeneration and will in fact support out of town retailing to the detriment of the town centre.

The Council also proposes changes to the housing numbers for the District and Blandford to reflect that the A350/A354 junction site has capacity for 300 homes compared to the capacity of West Blandford at 150 homes. The Crown Estate also feels that North Dorset District Council will have to give consideration to an even higher housing number. The current Plan period only extends to 2026 and will therefore be immediately out of date. Assuming the plan is adopted in 2015, the plan period should be extended to 2030 to ensure that a full 15 year period is covered from the date of adoption (as required by NPPF, paragraph 47). Accordingly, following the extension of the Plan period, four additional years should be added to the district wide housing requirement set out in Policy 6 of the Pre-submission Plan. This would mean that the overall housing requirement is increased from 4,200 in the period 2011-2026 to 5,320 in the period 2011 to 2030.

Notwithstanding the current consultation, an amended allocation at West Blandford which responds to heritage considerations will be required to assist in meeting housing demands in the District over the Plan period. The Crown Estate would welcome further discussions with the District Council to discuss how a sensitive design at West Blandford can be brought forward to help meet housing needs.

Suggested amendment to changes MAJ/16/1 and MAJ/16/2 to ensure soundness

It is considered that in order to meet the tests of soundness set out in NPPF particularly justified and consistency with national policy, that proposed changes MAJ/16/1 and MAJ/16/2 should be rejected. The Council could add reference to heritage impacts in Policy 16 to overcome objections on heritage grounds. Suggested alternative wording is provided below:

Meeting Housing Needs

..... In addition to infilling and redevelopment within the settlement boundary, Blandford's housing needs will be met through:

g mixed use regeneration of the Brewery site; and

h the development of land to the west of Blandford Forum. The scale, form and nature of development needs to be informed by a comprehensive masterplan/heritage/landscape assessment; and

i the development of land to the west of Blandford St Mary.

Infrastructure

..... New or improved facilities will include:

w informal open space at Crown Meadows associated with housing development to the west of Blandford Forum; and

x new sports pitches and associated facilities on land within the built up area of Blandford.

Appendix 1 – revised sustainability appraisal

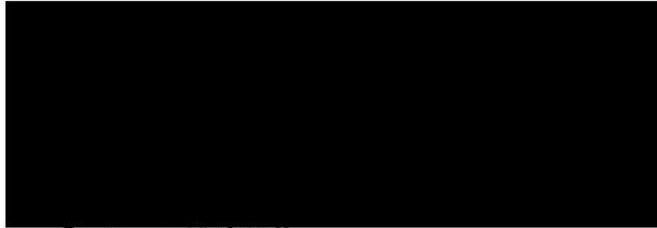
Performance of West Blandford Forum against Core Strategy Sustainability Appraisal objectives - Suggested alternative Scoring. Sustainability objectives where we propose a change are highlighted.

Sustainability Objective	NDDC's revised score West Blandford	Proposed score West Blandford	NDDC's revised score Land at A340/A354	Proposed score Land at A340/A354	Comment and suggested changes
1 Provide housing including affordable that meets the needs of the community.	++	++	++	++	
2 Create balanced communities where employment, housing and community needs are delivered to meet needs, improving access to essential services.	+	++	-	-	Suggested change for West Blandford from + to ++ Being within close proximity to the town centre and directly adjacent to the town's secondary school and a primary school, the site offers the best opportunity to deliver sustainable development in the whole town. The site is acknowledged as being the most sustainable option available to the Council (North and North East Dorset Transport Study, March 2010). Changing the score to ++ better reflects its sustainability credentials.
3 Improve the health and wellbeing of the population through reducing poverty and encouraging healthy lifestyles.	+	+	?	0	Suggested change for A350/A354 site from ? to 0 The A350/A354 site will provide a car based development that is less accessible by sustainable modes of transport such as walking and cycling.
4 Reduce barriers to individuals participating in their community	+	+	-	-	
5 Improve quality of life through well designed inclusive developments.	-	0	0	0	Suggested change for West Blandford from - to 0 Development in this location provides significant opportunities to enhance the urban edge left by development at Blandford School and the adjacent 60/70s development. The scheme can also deliver improvements to the parkland setting and provide access to the river meadows. The Crown Estate encourages a high quality design in accordance with their document 'Building in Partnership'.
6 Reduce the impact of climate change, including flood risk and make best use of the opportunities that arise	-	+	0	0	Suggested change for West Blandford from - to 0 The location of West Blandford provides greatest potential to reduce the impacts of climate change. The site is not at risk of flooding and the area proposed for development is entirely located in Flood Zone 1 (lowest probability of flooding). Being the most accessible location with excellent proximity to the town centre it provides greater potential to reduce car trips thereby supporting climate change objectives.

7	Protect and where opportunities arise, enhance habitats and biodiversity	--	0	+	0	<p>Suggested change for West Blandford from -- to 0 The Crown Estate has been in discussion with Vincent Wildlife Trust and Natural England regarding mitigation strategies. A landscape improvement strategy has been agreed which will provide significant local benefits to bat habitats across The Crown Estate's extensive Blandford Estate. This provides a significant opportunity to improve local bat habitats in perpetuity across a much wider area of land than is proposed for allocation.</p> <p>Suggested change for A350/A354 site from + to 0 The A350/A354 site is not proposing any enhancements to local habitats.</p>
8	Improve the quality of the built environment and protect the District's heritage	--	-	-	+	<p>Suggested change for West Blandford from -- to - The impact on the historic environment depends on the final scheme which is a planning application matter. The Crown Estate will encourage a high quality design on the site which would present an opportunity to improve the poor urban edge particularly, characterised by 1960s housing and utilitarian school buildings as identified in the Council's heritage assessment. Any development of the site would also positively respond to heritage structures in the locality and improve the parkland setting with potential for public access.</p> <p>Suggested change for A350/A354 site from - to + The Council's heritage assessment highlights that this site is less sensitive in heritage terms and the revised score reflects this.</p>
9	Recognise the importance of the district's distinct rural landscape.	--	-	-	-	<p>Suggested change for West Blandford from -- to -</p> <p>The Crown Estate is sensitive to the impact a development at this location may have on the historic views of the town from Blandford Bridge. We have sought to minimise any impact on these views through testing and designing initial plans that protect these views. We have prepared verified photomontages showing how a 200 and a 150 home development would appear when viewed from Blandford Bridge as recognised in the Council's heritage assessment. These demonstrate how little impact any development would have on important views from Blandford Bridge and would maintain the views along the river from the bridge. Further opportunities exist to restore the former parkland setting through the creation of the informal open space on Crown Meadows. Overall, development would effectively 'finish off' development on the western side of the town and can be integrated into the existing settlement pattern without harming the quality and character of the area or the openness of the river corridor.</p>
10	Reduce impacts on the environment	-	-	-	-	
11	Reduce pressure on the district's natural resources	-	-	-	-	
12	Promote energy and resource efficiency	+	+	+	+	
13	Improve the competitiveness of the District's economy	0	+	+	-	<p>Suggested change for West Blandford from 0 to + West Blandford provides an excellent opportunity to integrate new homes with the existing town, rather than it being severed by the bypass, which would maximise support to town centre businesses and the regeneration of the historic core.</p> <p>Suggested change for A350/A354 site from + to - The site is likely to support out of town retailing to the detriment of town centre regeneration.</p>

14	Enable local needs to be met locally and encourage sustainable forms of transport	+	++	+	0	<p>Suggested change for West Blandford from + to ++ The site offers the most sustainable Greenfield option available to the Council. The excellent location near to the town and local services means that residents would not be dependent on private car.</p> <p>Suggested change for A350/A354 site from + to 0 The A350/A354 site is outside the busy bypass and will never be as well connected or integrated with the existing town. Even if a bridge or subway option are affordable it will still not prevent the development of an essentially out of town and more car based development that is less accessible by walking and cycling. This would be counter to sustainable development objectives.</p>
15	Encourage a business environment	0	+	0	0	<p>Suggested change for West Blandford from 0 to + Being adjacent to the town centre it offers the greatest potential to support town centre business, encourage business investment and the regeneration of the town centre.</p>
16	Improve skills and work opportunities.	+	+	+	+	
Score		-2	9	1	-1	<p>A balanced consideration of sustainability criteria suggests that West Blandford outperforms the A350/A354 site in sustainability terms.</p> <p>The revised score for the West Blandford site better reflects the benefits of a town centre location in delivering sustainable development and supporting town centre businesses. It also reflects opportunities to mitigate impacts on built heritage and biodiversity not reflected in the Council's revised score.</p> <p>The revised score for the A350/A354 site better reflects the problems of integration for an edge of town location which is severed by a busy trunk road. It also reflects potential impacts on support for town centre businesses which is not reflected in the Council's assessment.</p>

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Reviewer: Neil Hall



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