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Representation # _____	



# North Dorset Local Plan Part 1

## Pre-submission Consultation 29 November 2013 to 24 January 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 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/planning/north-dorset/planning-policy](http://www.dorsetforyou.com/planning/north-dorset/planning-policy)

**Please return completed forms to:**

Email: [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)

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



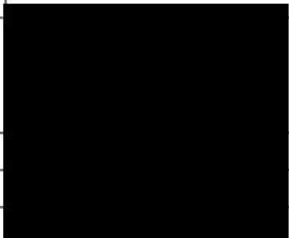
Alternatively you can submit your comments online at: [www.surveymonkey.com/s/NorthDorsetLocalPlan](http://www.surveymonkey.com/s/NorthDorsetLocalPlan)

**Deadline: 5pm on 24 January 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 on the pre-submission North Dorset Local Plan Part 1 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	Dr	
First Name	Peter	
Last Name	Miller	
Job Title (where relevant)		
Organisation (where relevant)		
Address		
Postcode		
Tel. No.		
Email Address		

## Part B – Representation

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 complies with the **legal requirements** and is **'sound'**.

If you are seeking to make a representation on the **way** in which documents 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 documents it is likely that your comments or objections relate to the **soundness** of the plans 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 one of the consultation exhibitions or call 01258 484201.

### 1. Please select which document you are commenting on:

- North Dorset Local Plan 2011 to 2026 Part 1 (please complete Questions 2 to 9)
- Final Sustainability Appraisal Report (please complete Questions 2 and 10)
- Habitats Regulations Assessment (please complete Questions 2 and 10)

### 2. Please state the part of that document you are commenting on:

Paragraph number:	Policy/site:	Policies map:
Part 8, paras. 11, 12, 14, 15, 16,	Crown Meadows – Land west of Blandford	16 Figure 8.1

18, 19, 23, 24, 40, 47 & 49

### 3. Do you consider the Local Plan 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 to be 'sound'?

- Yes  No

### 5. If you consider the Local Plan 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 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 inclusion of the Crown Meadows in the Local Plan is unsound because:

- Its inclusion in the draft plan was engineered by a dishonest subterfuge which identified the land as being 'Land to the West of Blandford' rather than as Bryanston Park/Crown Meadows.
- The inclusion is contrary to the wishes of local councillors and the overall majority of the residents of Blandford Forum as stated at public consultations, letters and in petitions; thus contravening the Localism Act.
- The public consultations and the form of questioning were misleading and biased in favour of the Crown Estate proposals.
- An alternative more viable site for development, namely the site at St Mary's Hill, was known to the NDDC Planning Department from the outset yet omitted from the consultation.
- Cabinet and Councillors were blackmailed into endorsing the proposed development on the grounds that further consultation and changes would introduce unacceptable delay and prevent completion in time for presentation to the Secretary of State; this was untrue.
- The traffic assessment report produced by the Crown Estate was significantly flawed. Dubious assumptions were made which resulted in an under prediction of the expected traffic density. My reasons for these statements are contained in a review of the Crown Estate study, which I have appended to this document.

Reasons for not developing the Crown Meadows

- The Crown Meadows are identified as the River Stour Meadows Conservation Sub-area and an AONB; they should be protected.
- The Crown Meadows, an historic deer park, provide an historic setting for the town and have been significant in its development.
- The Crown Meadows are a flood plain for the River Stour. The flood risk analysis assumes the 1979 flood is a 1 in 100 years flood and this is used to determine the above 1 in 1,000 years flood level for allowable development. In reality the 1979 flood level has reoccurred every 10 or so years and the prediction is biased. It is clear that adequate allowance has not been made for global warming.
- The Crown Estate flood risk assessment ignored the risks associated with high ground water levels. The water table over much of the site will be less than one metre from the surface and outside the current Government recommendations, thus risking damage to underground services.
- The Crown Meadows are an area of unimproved meadowland, unaffected by the ploughing and chemical fertilizers associated with modern agriculture. As a result the land supports a number of rare and protected flora and fauna including the endangered greater horseshoe bats.
- The boundary of the proposed development formed part of a unique World War II anti tank defense system, which is still largely intact. Its importance has been recognised by English Heritage and it is Grade II listed. It is important to retain its historic setting overlooking an open meadow otherwise its significance is lost and tourism damaged.
- Traffic from the proposed site would have to pass through the town centre on its return journey. The extra 200-400 car journeys per day due to the development would significantly increase the congestion in the town. At certain times of day it can take 20 minutes or more to pass through town to White Cliff Mill Street, a journey on clear roads that should take less than one minute, and this can only worsen.
- None of the above concerns apply in respect of the alternative site at St Mary's Hill. There is, therefore, absolutely no case to proceed with proposals for development on the Crown Meadows.

**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.

Policy 16 paragraph 8.24 should be amended to omit mention of land to the west of Blandford Forum and identify only the St Mary's Hill site.

*Continue on a separate sheet if necessary*

**8. If your representation is seeking a change, 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.

I would like to comment upon the traffic assessment studies carried out in support of proposed development on Bryanston Park/Crown Meadows. I believe the traffic assessment report produced by the Crown Estate was significantly flawed. Dubious assumptions were made which resulted in an under prediction of the expected traffic density. My reasons for these statements are contained in a review of the Crown Estate study, which I have appended to this document.

**10. Please outline your comments on the Final Sustainability Appraisal Report or 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.

The Cliff on the opposite side of the River Stour is an area of ancient woodland and an important habitat for wildlife, including the greater horseshoe bat, which has also been identified as a Site of Nature Conservation Interest (SNCI). Development of the meadow land would be detrimental to numerous animals occupying the Cliff and river areas.

**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 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: \_\_\_\_\_

Date: 22 January 2014

*If submitting the form electronically, no signature is required.*

# **The Impact of Developing Bryanston Park/Crown Meadows on Traffic Congestion in Blandford Town Centre.**

## **Overview**

The Crown Estate commissioned Entec UK Ltd to write a report on the impact housing developments at West Blandford and West Blandford St Mary would have for traffic in the town centre. The site of the proposed development at West Blandford (Bryanston Park) can only be accessed via the town centre due to one-way roads. This means that car ownership and usage are critical to determining whether the development would increase traffic through the town. The report concluded that any development would not create additional problems, and that it would actually lower traffic in the town in comparison to alternative proposed sites for development.

Below is a critique of the Entec UK Ltd report assessing the validity of the data used and conclusions drawn. It is concluded that several issues have not been adequately addressed and traffic flow is likely to increase significantly. It appears doubtful that the development would satisfy Policy SD4 of the Draft South West Plan.

## **Critique**

**1. Car ownership.** Section 4.5 of the report assumes the same level of car ownership for the proposed development as for residents of Blandford Old Town Ward (2001 Census). Households in Blandford Old Town are *three times more likely not to own a car than the Dorset average*. The following points suggest that this is not a reasonable comparison:

- 1.1. Blandford Old Town roads are narrow and parking is at a premium. The Bryanston Park development would have adequate roads and parking, encouraging car ownership in line with the county average rather than the Old Town average.
- 1.2. Blandford Old Town is the 23<sup>rd</sup> most deprived area of Dorset, out of a total of 247 (The Index of Deprivation 2010, produced by Dorset CC). A new development is more likely to have a deprivation index of between 170 and 204, comparable to the Damory Down and Hilltop estates respectively. It is therefore more reasonable to assume car ownership rates from these developments.
- 1.3. A new development of luxury housing will be more likely to attract families than property in the Old Town and the families will be in a higher income bracket. Frequently in modern families both parents will be working and have their own car, and potentially teenage children with their own vehicles.

Blandford Old Town is vastly different geographically, economically and demographically from the proposed development. To that end, projected car ownership figures should be based on an equivalent estate such as Damory Down or Hilltop, suggesting that ownership would be significantly higher than the statistics used by Entec UK Ltd.

**2. Employment.** Tables 4.3 and 4.4 of the Entec UK Ltd report show the mode of travel to work and work destinations for Blandford Old Town residents (2001 Census), and suggest these figures will also apply to the proposed development. Entec UK Ltd conclude that 44% of journeys to work will remain in the Blandford area, and be suitable for walking.

- 2.1. Data from the 2001 Census is now eleven years out-of-date. In 2001 the number of dwellings in Blandford was 4,524, by 2010 a further 737 dwellings had been built and 420 dwellings given planning consent; a total increase of over 25%. Given that businesses have

moved out of the town centre, it is highly likely that the figures from eleven years ago no longer reflect current employment and commuting figures.

2.2. The 2001 Census shows one in four of the Blandford Old Town residents worked in town and were able to walk to their place of employment. Given that there are minimal medium and large size employers in the centre of town, it is reasonable to assume that the majority of residents on a new development will not be able to find jobs in the centre of town and will need to travel outside of what can be considered walking distance.

2.3. For many years now there has been an ongoing trend for town centre firms to relocate to the industrial estates on the North of the town. These are likely to provide some employment for residents of the new development. However, the estates are beyond reasonable walking distance from the proposed site, and with generous parking available it is feasible that employees would feel encouraged to drive to work. Even cycling is unlikely to prove popular due to the steep hills.

2.4. A significant number of new homes in the Blandford area are likely to be purchased by families from areas such as Poole or Bournemouth owing to the house price differential between Blandford and the coast. These new residents will already have employment outside the town and are unlikely to give up their jobs.

The statistics used in the Entec UK Ltd report are not based on current employment and commuting patterns. As with car ownership, it would be more appropriate to consider the statistics from an equivalent existing housing estate rather than that of the Old Town. It seems questionable that 176 residents (44% of 200 households containing 2 workers) would be able to find employment within the Old Town. These additional commutes to outside of the Old Town would create a significant increase in the daily traffic.

**3. Bus services.** Table 4.1 of the Entec UK Ltd report summarises the bus services in Blandford Forum and concludes that the proposed development represents a 'highly sustainable location'.

3.1. Only Blandford to Poole (hourly) and Blandford to Shaftesbury (10 buses per day) have frequent services suitable for commuting. All other routes (Dorchester, Bournemouth, Salisbury, Weymouth) either have services suitable for social or shopping trips, or none at all. Even hourly services are barely adequate for commuting unless work hours can be adjusted to match the bus timetable.

As an example, consider a daily commute from Blandford to Poole. The bus journey takes over 40 minutes from Milldown Road (within the 400m maximum walk distance determined within the 1999 CIHT publication 'Guidelines for Planning for Public Transport Development'). Allowing 10 minutes walk either end from home and to work would result in a total commute of over an hour. This journey could be achieved in 20 minutes by car. In addition, a car provides flexibility, eliminates the need to wait around, and protection from the weather.

Given the current bus services available, it seems likely that they would result in only a small reduction in car usage.

**4. Traffic congestion study.** The report states that the 'audit of the local road and sustainable transport networks, and their operation' found the network was fluid and did not generate queues or delay during the early morning peak period, although noting queuing and delays to buses during the evening peak period. Yet traffic in the centre of town has long been a problem with residents regularly encountering queues and delays. The likely reason the survey and general experience differ so markedly is that the survey was carried out in November when traffic levels are a minimum and there are fewer pedestrians in town. Had the survey been carried out during the

warmer months, when traffic levels are higher and more pedestrians are in town the conclusions would have been very different.

**5. Journeys for pleasure.** The Entec UK Ltd report suggests that a benefit of the Bryanston Park development is that residents on the new estate would be able to walk into town in the evening for leisure activities. However, if their preference was for the cinema, concerts, theatre or clubbing then there is no alternative than to travel to places such as Bournemouth or Poole, requiring the use of a car.

**6. Bryanston Park versus alternative proposed sites.** The development of Bryanston Park is being considered alongside alternative proposed sites.

6.1. These alternative sites are based within easy reach of the town bypass, and it is not necessary to access them via the centre of town. Yet, the report suggests that an estate in Bryanston Park would generate less traffic through the Old Town.

6.2. The proximity of the proposed development to the town centre, with its ease of walking into town, would prove attractive to town centre workers and visitors. It would provide free parking at a closer distance than the car park in Stour Park. This means that visitors parking at Bryanston Park would have made a trip through the town centre, which they otherwise would not have done.

Bryanston Park is unique amongst the sites identified as all the others can be accessed from the bypass without entering the town centre. As a consequence the Bryanston Park development would have the largest impact on town centre congestion.

### **Conclusions**

The data used in the Entec UK Ltd report does not represent the geographic, economic or demographic profiles of the proposed development on Bryanston Park. Looking at comparable estates in Blandford, and using up-to-date statistics would provide a more reliable survey on the impact any development would have on traffic in the Old Town. Given the above points, it seems more credible that households in the new development would have higher car ownership and be more likely to commute to work by car than depicted in the Entec UK Ltd report..

The Entec UK Ltd report (Page 7) states that it is proposed to develop more than 200 houses, rather than the 200 on which the study was based. In a modern family where both parents work, this could mean more than 400 additional car journeys through the centre of town every day.

In order for Dorset County Council to understand the implications of building on Bryanston Park, the Crown Estate will need to commission a further report using valid data and analyses to be submitted with any planning application.

Peter Miller (PhD)  
February 2012