

**BLANDFORD+ NEIGHBOURHOOD PLAN 2011 – 2033**

**REGULATION 14 REPORT: JANUARY 2019**

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**Appendix A – AECOM response to SA/SEA comments**

**Appendix B – Steering Group statement on Blandford Camp**

## **1. Purpose of the Report**

- 1.1 The purpose of this report is to summarise part of the outcome of the consultation period on the Pre-Submission Blandford + Neighbourhood Plan 2011 – 2033 held from 7 November to 19 December 2018. The report reviews the representations made by statutory consultees, and by developers/landowners. It then makes recommendations for minor modifications to the Plan and supporting documents for its submission.
- 1.2 The report will be published by the 'qualifying body', Blandford Forum Town Council in conjunction with Blandford St Mary Parish Council and Bryanston Parish Council, and it will be appended to the Consultation Statement that will accompany the submitted Plan in due course, in line with the Neighbourhood Planning (General) Regulations 2012 as amended.

## 2. Consultation Analysis – Content of the Plan & Recommendations

- 2.1 During the consultation period there were representations made by local people, by statutory consultees, developers/landowners and by other local and interested organisations. The responses from the local community have been reviewed and analysed by the Steering Group and its summary of those responses is reported in Section 4 of this report.
- 2.2 This section of the report summarises those representations made by statutory consultees, developers/landowners and other interested organisations in relation to the extent to which the plan meets the Basic Conditions but which were not policy specific. Such comments were received from Dorset County Council, Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty Partnership, Pimperne Parish Council, Genesis Town Planning (on behalf of Wates Development Ltd), and Hallam Land Management
- 2.3 Details of the full representations are available on the neighbourhood plan website.

### Dorset County Council (DCC)

- 2.4 The Minerals and Waste Planning Authority made representations which focus on the relationship between the Neighbourhood Plan and the emerging Dorset Waste Plan and seeks an update on the examination of the Dorset Waste Plan to be reflected in Section 3 of the Neighbourhood Plan together associated policy references and the siting of the Waste Management Centre allocated to the north of Blandford.

**It is recommended that Section 3 of the Submission Plan is updated accordingly.**

### Cranborne Chase and West Wiltshire Downs (CCWWD) AONB Partnership

- 2.5 The CCWWD AONB Partnership maintains their objection to the Neighbourhood Plan and considers that the issues that they raised with the Steering Group in its meeting held prior to the publication of the Pre-Submission Plan have not been addressed. In their response, the CCWWD AONB makes no reference to the published Site Selection Background Paper which responded to the points they made at that meeting. Nevertheless, there appears to be three overall matters which the CCWWD AONB continues to raise and these have been dealt with below.
  - i. **Exceptional circumstances** – The response suggests that the Neighbourhood Plan has applied local interests as being the exceptional circumstances to support development in an AONB. For example, it uses the argument that the provision of school places is a local issue rather than a national one. Furthermore, the response states that there are no exceptional circumstances that exist and that a general strategic aim to provide more housing is not exceptional circumstances. In addition, the response suggests that the housing site allocation policy is landowner rather than community driven.

- 2.6 The Steering Group has on a number of occasions and in a number of different ways made it clear that the plan is being driven by the need to address the lack of infrastructure in the northern part of the town of Blandford Forum. This is evident in paragraphs 3.10, 3.16 and 3.17 of the Pre-Submission Plan. It has done so in all consultation materials and discussions and this need is at the heart of the community's concerns since the commitment to prepare a Neighbourhood Plan was made by the qualifying body. Additionally, the Site Selection Background Paper produced as part of the evidence base for the Neighbourhood Plan evidences how the public interest tests as set out in NPPF paragraph 172 have been met to demonstrate the exceptional circumstances that exist in this case to bring forward major development in the AONB (if the major development test applies). This includes a clear demonstration that the delivery of school places is a national priority to which the Government attaches great importance.

**It is recommended that the Submission Plan strengthens the emphasis that the Neighbourhood Plan is an Infrastructure led plan intended to deliver a new primary school in the northern part of the town and this should be reinforced in the Foreword, and in Sections 1 & 3.**

- ii. **Sustainable development** – There are several references in the CCWW AONB response regarding the position of development in relation to the bypass determining whether development is sustainable.
- 2.7 It must be clarified that defining sustainable development does not simply rely on the distance of development from a town centre, or its position in relation to a bypass. The Sustainability Appraisal and Basic Conditions Statement will demonstrate how the plan contributes to sustainable development.

**It is recommended that no changes are necessary in response to this comment.**

- iii. **NPPF and Strategic Policy Conformity** – The response in general draws on references of the NPPF 2018 and suggests that the assessment of the policies' degree of consistency with the 2018 Framework has not been made. Additionally, the response considers that the review of the Local Plan is a more appropriate consideration for major development in the area and that this cannot be brought forward under the Neighbourhood Plan as it is unable to consider matters beyond its administrative boundary. It also considers that the only difference in bringing the site allocation matter forward again is due to the lack of the five-year housing delivery supply in the District.
- 2.8 Paragraph 3.3 of the Pre-Submission Plan made it clear that an assessment of policies in relation to the 2018 Framework will be made in the Basic Conditions Statement and this will be submitted with the Submission Plan documentation to NDDC. Additionally, Section 1 of the Site Selection Background paper and its appendices explain the role of a Neighbourhood Plan in making site allocations. The Steering Group did consider that the loss of the five-year housing land supply in the District could have had an impact on the examination of a previous version of the Neighbourhood Plan however. Since then, it has worked with NDDC (the Local Planning Authority) to discuss and agree the relationship of the

emerging Neighbourhood Plan with the emerging Local Plan and adopted development plan. The Neighbourhood Plan continues to be an infrastructure led plan intended to address the critical need for education infrastructure in the northern part of the town, and the planning circumstances, including the Local Government Review and the potential delay that may result in bringing forward a new Local Plan, is an important matter of fact.

**It is recommended that no changes are necessary in response to this comment.**

- 2.9 A further statement on **lack of contributions** for impacts on the AONB and that these could take the form of financial contributions to AONB Management Plan purposes has been included in the response. Such contributions would not be necessary to make the development acceptable and it is therefore not considered appropriate at this late stage for the Neighbourhood Plan Group to undertake negotiations to address this matter.

**It is recommended that no changes are necessary in response to this comment.**

Pimperne Parish Council (PPC)

- 2.10 The response raises five matters in relation to the Neighbourhood Plan and its supporting documentation. The response also comments in detail on policies and supporting documents, and these have been included in the analysis of each policy/document below.

1. **Recognition of constraints relevant to Pimperne** – considers it appropriate to include in their Plan a local gap policy, employment area, settlement boundary and LGS designation in the Pimperne Neighbourhood Plan which has not yet been made.

- 2.11 The Pimperne Neighbourhood Plan has passed examination and a referendum is scheduled for 10 January 2019. If the referendum is successful, and NDDC confirms that the plan is 'made' it will form part of the development plan and it may therefore be appropriate to include reference to it in Section 3 of the Plan as it will form part of the development plan, however none of its policies impact on the policies in this Neighbourhood Plan.

**It is recommended that Section 3 of the Plan includes reference to the Pimperne Neighbourhood Plan and its status at the time of the Submission of the B+ NP.**

2. **Inappropriate references to development within Pimperne Parish** – see Policy B2 below.
3. **Uncertainty over Impacts** – references a recent EIA application for part of the land included in the site allocation policy.

- 2.12 The Neighbourhood Plan policy deals with part of the land which forms part of the recent EIA application. The EIA application was not made by the Neighbourhood Planning group, nor was it party to its preparation,

and this remains a separate matter to the preparation of the Neighbourhood Plan.

**It is recommended that no changes are necessary in response to this comment.**

4. **Uncertainty over allotments** – see Policy B2 below.
5. **Treatment of alternatives and the SEA** – see SA comments below.

Genesis Town Planning (on behalf of Wates Development Ltd)

- 2.13 Representations have been received making land available for housing, a large area of informal public open space/landscaped parkland, a riverside walk/cycleway, and works to improve functionality of Pimperne stream. The area lies adjacent to the site boundary of the proposed allocation in Policy B2.
- 2.14 The purpose of the proposed allocation in Policy B2 is to deliver infrastructure and its delivery depends on the release of land for housing. The Neighbourhood Plan has accommodated the level of housing contained in the 'specification' agreed with NDDC and therefore does not need any further land to be made available to deliver the necessary infrastructure.

**It is recommended that no changes are necessary in response to this comment.**

Hallam Land Management (HLM)

- 2.15 The response seeks clarification that Land North of Ward's Drove forms part of point k. in the Vision.

**It is recommended that item J in the Vision is amended for clarification.**

### **3. Consultation Analysis on policies of the Plan & Recommendations**

- 3.1 This section of the report summarises those representations made by statutory consultees, developers/landowners and other interested organisations in relation to the extent to which the proposed land use policies meet the basic conditions as required by the Regulations. Details of the full representations made are available on the neighbourhood plan website.
- 3.2 DCC, North Dorset County Council (NDDC), CCWWD AONB, Historic England, PPC, Forum Commercial Estates Ltd (FCEL), Savills (on behalf of the Davis Coates Families), Barton Willmore [on behalf of Wyatt Homes (Lewis Wyatt Construction Ltd) and landowners (The West Pimperne Pool Trust, Mr C Coats and Mr T Coats)], and Bryanston (RFE) Ltd made comments in relation to the proposed land use policies of the plan in meeting the basic conditions as required by the Regulations. These comments have been analysed under each relevant policy below.

#### **B1 – Blandford Forum and Blandford St Mary Settlement Boundaries**

- 3.3 CCWWD AONB – The AONB Partnership objects to the policy as it extends the settlement boundary into the AONB. It considers that the policy is misleading in stating that it is regularising provisions of the Local Plan.
- 3.4 The establishment of settlement boundaries in North Dorset is usual practice. The settlement boundary is being amended to include the areas of growth, some of which have now come forward as planning applications, in the Local Plan Part 1 and the allocations being made in the Neighbourhood Plan, and this has been agreed as an acceptable approach with the Local Planning Authority.

**It is recommended that no changes to Policy B1 are necessary.**

#### **B2 – Land North and East of Blandford Forum**

- 3.5 DCC – Considers that the policy and supporting text should refer to the proposed waste management centre on the adjoining land in not prejudicing the operation of the waste management centre to ensure there are no adverse effects though design, layout, and mitigation and vice versa. Additionally, that the supporting text should refer to emerging Policy 24 of the Waste Plan.

**It is recommended that these amendments are made to Policy B2.**

- 3.6 CCWWD AONB – The Partnership objects to the policy as it does not consider that the development can be delivered by the Neighbourhood Plan and that what is being proposed is not sustainable development.

- 3.7 As set out in Section 2 the response does not appear to have taken into account the Site Selection Background Paper where this matter has been explored.

**It is recommended that no changes to Policy B2 are necessary in relation to this response.**

- 3.8 Historic England – The response highlights that the policy should include a requirement to minimise harm to designated heritage assets.

**It is recommended that amendments to Policy B2 are made in that the design scheme includes measures to minimise the harm to designated heritage assets.**

- 3.9 Bryanston (RFE) Ltd – Considers that land at River Stour Meadows and additional land at Lower Bryanston Farm should be allocated for development. It also suggests that the school site is not dependant on the delivery of the housing allocated in the policy.

- 3.10 The Site Selection Background paper sets out how the options for the Neighbourhood Plan were tested and chosen.

**It is recommended that no changes to Policy B2 are necessary in relation to this comment.**

- 3.11 PPC – Inappropriate references to development within Pimperne Parish – considers it inappropriate to refer to land in Pimperne and considers there are inconsistencies in referencing the examiner's report.

- 3.12 It is a matter of fact that a portion of land, which is in the landowner's control, extends into the parish of Pimperne, and to ignore this would not be appropriate. The policy, therefore, needs to make it clear that it is not relying on the release of land beyond the control of the Neighbourhood Plan to deliver its allocation, and it does this as written. The supporting text makes statements of fact, however reference to the examiner's report for the Pimperne Neighbourhood Plan is not necessary and can be deleted.

**It is recommended that references to the Pimperne Neighbourhood Plan examination is deleted from paragraph 5.24 of the Pre-Submission Plan.**

- 3.13 PPC – Uncertainty over allotments – suggests that there is conflict between the supporting text and criteria of the policy regarding the relocation of allotments.

- 3.14 It will be for a planning application to demonstrate that the scheme meets the criteria set out by planning policy. The supporting text merely demonstrates that this matter is acceptable in principle. It is not considered necessary to elaborate on negotiations taking place between the landowner and the Town Council in order to meet the criteria set out by the policy in the supporting text of the plan.

**It is recommended that no changes to Policy B2 are necessary in relation to this response.**



- 3.15 Barton Willmore – The response indicates that the type, size and tenure of housing to be delivered at the site will be subject to negotiation and agreement with NDDC as part of the planning application process. In addition, it is necessary to ensure consistency with the July 2018 NPPF, particularly in relation to the definition of affordable housing and the need for flexibility and suggests that the policy is amended as such.
- 3.16 The Neighbourhood Plan will now be examined under the 2018 Framework and it is therefore not unreasonable to align the definition of affordable housing to that in annex 2 of the 2018 Framework which defines affordable housing to include: affordable housing for rent, starter homes, discounted market sales housing and other affordable routes to home ownership. Additionally, the adopted Local Plan does not make provision for self-build and custom homes and the Local Plan Review recognises that this has to change due to the demand in the area.

**It is therefore recommended that the policy criterion is amended to reflect the definition of affordable housing, and the supporting text explains the justification of requiring self-build and custom homes.**

- 3.17 It is also pointed out that there is inconsistency in defining the number of homes i.e. “approximately 400” and further on “at least 400 homes”. Due to the number of mitigation measures that may be required on site,

**It is recommended that the plan uses “approximately 400” throughout.**

- 3.18 The response also queries whether the need for new GP services and facilities as set out in the Vision and criterion iv. of the Policy have been adequately demonstrated and reserves the right to comment on Policy B7 until it has seen further evidence.
- 3.19 The Neighbourhood Plan Working Group arranged a roundtable discussion with NDDC, the Dorset Clinical Commissioning Group (DCCG) and the GP surgeries in Blandford. The need for new facilities has been made clear from both organisations.

**It is recommended that a Health Background Note is prepared by the Steering Group and is included in the evidence base for the plan and that the policy makes it clear that the facility to be provided is a health and wellbeing facility that would enable satellite services to be delivered by GP Surgeries and not a conventional GP Surgery.**

- 3.20 The response also seeks amendments to the policy in relation to the type of application to be made suggesting that a hybrid application (part full, part outline) should be considered as this will allow for part of the proposals to come forward in detail providing certainty over what will be delivered as well as enabling quicker delivery.
- 3.21 The policy aims to ensure that its requirements are demonstrated in a comprehensive application, so as to avoid piecemeal applications. This does not need to be in the form of an outline application and can be in the form of a hybrid application.

**It is therefore recommended that the policy and supporting text is amended to make it clear that any application needs to present a comprehensive scheme.**

- 3.22 The response also seeks clarification on the provision of the school at the site in relation to the size of the school i.e. consistency in wording which currently states 'at least a 2FE' or '2FE with space to expand to a 3FE'.
- 3.23 The policy makes it clear that the education scheme should comprise a new 2FE primary school with integrated early years provision and be able to accommodate expansion to a 3FE primary school at a later date. The references to at least a 2FE school are the specification agreed with the Local Planning Authority. The Education Authority has set out, in its Pupil Planning Statement, what is required at this site and it is clear in the policy.

**It is recommended that no changes are necessary to Policy B2 in relation to this comment.**

### **B3 – Employment**

- 3.24 DCC – Considers that the policy and supporting text should refer to the proposed waste management centre on the adjoining land in not prejudicing the operation of the waste management centre to ensure there are no adverse effects though design, layout, and mitigation and vice versa. Additionally, that the supporting text should refer to emerging Policy 24 of the Waste Plan and some minor word changes to criterion (c)(i). DCC confirms that the indicative site area for the proposed facility is not yet known and the policy should reflect this.

**It is recommended that these amendments are made in the Submission Plan.**

- 3.25 FCEL – The response considers that the flexibility applied for uses that create an increase in jobs at (c) Sunrise Business Park in the policy, should also be applicable to (b) Land off Shaftesbury Lane. It criticises the supporting evidence, which include discussions with the Dorset Chamber of Commerce and commercial departments of local estate agents, as superficial and anecdotal and not robust evidence to justify a departure from the Local Plan flexible approach. It suggests that the site would benefit from a flexible approach and as landowners of a substantial part of the land confirms that interest has largely been expressed for other commercial development such as a hotel and retail, rather than traditional B1 to B8 uses.
- 3.26 The Site Selection Background Paper sets that there is currently 3.46 ha of employment land available in Blandford Forum and the Plan's approach to employment would include safeguarding existing employment land wherever possible. The updated NDDC Annual Monitoring Report of 2018 identifies 4.16 ha of employment land available in Blandford Forum and the current Local Plan approach provides some extent of flexibility but it does not provide the extent of flexibility that the response suggested.

**It is therefore recommended that no changes are necessary to Policy B3 in relation to this comment.**

- 3.27 CCWWD AONB – The Partnership objects to the part of the policy concerning an extension to Sunrise Business Park but admits that Land off Shaftesbury Lane proposals have been able to negotiate matters that would minimise the impacts on the AONB. The Partnership also highlights that the policy does not attempt to control lighting for Land at Sunrise Business Park.

**It is recommended that the elements required to minimise light spill into the AONB for (b) Land at Shaftesbury Lane is also required for proposals on (c) Sunrise Business Park in Policy B3.**

- 3.28 Savills – The response provides an update to the Waste Plan examination and suggests that Section 3 is reviewed in light of this information. As land agents for the owners of the land the response confirms that the remainder of the land not used for the waste facility will be made available for employment purposes, or all of the land in the event of the proposal not coming forward. This is also reflected in the response from Barton Wilmore.

**It is recommended that these amendments, as set out by DCC, are made in the Submission Plan.**

### **B10 – Local Green Spaces**

- 3.29 NDDC – Urges the Neighbourhood Plan Group to reassess the sites previously discounted for LGS protection. Specifically, sites such as the Milldown, Angus Wood, The Marsh and Ham and Woodhouse Gardens.
- 3.30 It is well known that the Milldown and the Stour Meadows are local nature reserves (LNRs). LNRs contain habitats of at least local significance. They are designated by local authorities where protection and public understanding of nature conservation is encouraged, and it would therefore be considered protected under this status. It also suggests that amenity green space that have been identified, such as those around Gurkha Road, do not meet the tests however these have passed the assessment for such designation as such and indeed passed examination. However, the matter has been raised and it is therefore necessary to revisit these assessments.
- 3.31 Bryanston (RFE) Ltd – The response suggests that 5. Land adjacent the Leisure Centre is not justified and superfluous.
- 3.32 The Local Green Space Study 2018 assesses the Local Green Space against the tests set out in the NPPF and is considered to meet the criteria for designation. The study was not published as part of the evidence base for the Pre-Submission Plan.

**It is recommended that no changes to Policy B10 are necessary, but that the Local Green Spaces Study 2018 is reviewed published as part of the evidence base of the Submission Plan.**

## **B11 – Managing Design in the Conservation Area: Blandford Forum**

- 3.33 NDDC – Comments have been made in relation to conservation sub-areas (i to ix) which have been derived from the Local Plan 2003 as being unnecessary.
- 3.34 The extent of the policy application is defined on the Policies Maps and it is therefore considered the references to the sub-areas from the Local Plan 2003 can be removed.

**It is recommended that references to sub areas in Policies B11 – B13 are removed.**

- 3.35 Bryanston (RFE) Ltd – Suggests that policy wording does not allow for the public benefits test as set out in the NPPF.
- 3.36 The Plan deliberately avoids repeating existing national planning policies which will continue to apply in addition to any made Neighbourhood Plan policies.

**It is recommended that no changes to Policy B11 are necessary in relation to this comment.**

## **B14 – The River Stour Meadows**

- 3.37 Bryanston (RFE) Ltd – The response insists that a modest form of development could be accommodated here.
- 3.38 The policy does not prevent sensitive development coming forward here and only seeks to ensure that any development that does come forward respects the character of the area. The Steering Group recognises that there may be detrimental features in the area, such as the Deer Park Stables, which would benefit from enhancement and the policy does not prevent such schemes from coming forward. A draft Conservation Area Appraisal has now been received and information from this document can be reflected in the Plan.

**It is recommended that the supporting text is amended to reflect the information received in the Draft Conservation Area Appraisal.**

## **4. Summary of Community Comments**

4.1 No adverse comments were received in relation to Policy B1 'Blandford Forum and Blandford St Mary Settlement Boundaries'.

4.2 The principle of Policy B2 'Land North and East of Blandford Forum' was supported by the majority of respondents.

4.3 Concerns were raised from a Pimperne resident that B+NP2 is proposing 'development in an area already covered by a designated Neighbourhood Plan'. This is not the case as B+NP 2033 proposals only cover the designated Neighbourhood Area.

4.4 Mention was made of a document published in November 2018 by the Defence Infrastructure Organisation (DIO) in which it was listed that the DIO should 'Engage with the market to understand most suitable disposal strategy' for the Royal School of Signals, Blandford. The B+ Steering Group are clear that this is not within the remit of the B+ Neighbourhood Plan (the camp being well outside the boundary, the lack of certainty regarding this and the many previous announcements, and the timescales that would be involved) so consider it a matter for the Local Plan Review. Nonetheless, a statement has been prepared by the Steering Group, see attached as Appendix B.

4.5 Concerns were raised about the mitigation against the increase in traffic flows and greenhouse emissions. Policy B2 already requires "*design features that improve energy efficiency and reduces carbon dioxide emissions*". Transport details for the scheme will be published as part of the B+ Submission documents. The plan establishes a Green Infrastructure Network to encourage cycle routes and footpaths. Specific proposals will come forward as new schemes demonstrate how they enhance the Network.

4.6 Concerns were raised regarding the demand for, and the ability to manage a community centre on the site. Likewise, concerns were raised regarding the provision of a new general practice facility, given the difficulty in attracting new GPs to the area.

4.7 No adverse comments were received in relation to Policy B3 'Employment'. A need was expressed for the creation of 'local' jobs, encouraging employment opportunities for Blandford residents.

4.8 No adverse comments were received in relation to Policy B4 'Secondary Education', B5 'Community Facilities', or B6 'Blandford St Mary Community Hall'. Concerns were received regarding Policy B7 'Health Provision' about the lack of GPs and Dentists in Blandford, and the need to increase facilities to meet current and future demand.

4.9 No adverse comments were received in relation to Policy B8 'Blandford Forum Town Centre'. Suggestions were made to further enhance the 'Unique Georgian' identity of the town by improving the facades of specific properties, and through encouraging individual, quality and specialist shops.

4.10 Several comments were received regarding Policy B9 'Green Infrastructure Network' and B10 'Local Green Spaces' about the importance of providing footpaths, cycleways and open spaces to reduce car usage and to promote health. Concerns were raised that the plan is missing a clear map of the Green Infrastructure and Local Green Spaces.

**It is therefore recommended that a separate inset map is created to raise the profile of the Green Infrastructure and Local Green Spaces proposed within the plan.**

4.11 No adverse comments were received in relation to Policy B11 Managing Design in the Conservation Area: Blandford Forum, B12 Managing Design in the Conservation Area: Blandford St Mary and B13 Managing Design in the Conservation Area: Bryanston.

4.12 An error was identified in Policy B14 'The River Stour Meadows'. Bryanston Estate (which includes the Meadows) is owned by Bryanston RFE and not Crown Estates as previously stated.

4.13 A comment was received regarding Policy B15 'Tourism' that tourism could be significantly boosted through a combined offering of our 'renowned Georgian town centre with a 'properly enhanced and renewed Bryanston Deer Park with central Ham parking'.

4.14 One comment received supported the plan but raised concerns Policy 3 of the previous plan 'Land at Salisbury Road, Blandford Forum' had been removed and along with it reference to the retention of the main building at Norden. The main aim of the original Policy 3 of the B+NP 2031 was to secure the provision of a community hub on the site. The B+ Steering Group reviewed Policy 3 in January 2018 and decided that the aim had been achieved and so the policy was removed.

4.15 Several comments were received regarding ongoing or proposed developments in Dorchester Hill, Fairmile Road and Lower Bryanston Farm. These developments come under the remit of the Local Plan (managed by North Dorset District Council) and are therefore outside the scope of Blandford+ Neighbourhood plan to comment.

## 5. Other Comments & Analysis

- 5.1 The title of the Neighbourhood Plan has been B+NP2 throughout the process. This was a natural title that the group adopted as it was going through the Neighbourhood Plan Process from the Pre-Submission stage for the second time. However, the first Neighbourhood Plan was never made, and therefore the title could be seen as misleading and indicates that there is a first Neighbourhood Plan when there is not, and the Steering Group should avoid confusion that the plan is a repeat proposal.

**It is recommended that the Submission Plan is published without reference to this title, and references in supporting documentation to accompany the Submission Plan and the website is amended accordingly.**

- 5.2 Following discussions with DCC who considered that Section 6 would benefit from some clarification in relation to CIL and S106 contributions to the effect that if CIL was in place, CIL and S106 contributions would be used to fund infrastructure projects on the 123 list or in the Neighbourhood Plan. In the absence of CIL, S106 contributions would be used.

**It is recommended that Section 6 of the plan is clarified.**

- 5.3 An erratum was published on 11 November 2018 alongside the Pre-Submission Plan to rectify para 5.72 on page 49 in terms of recording the owners of a large proportion of Bryanston parish.

**It is recommended that the amendment is made in the Submission Plan.**

### **Sustainability Appraisal (SA)**

- 5.4 CCWWD AONB – The Partnership identifies 'shortcomings' in the report in terms of its structure and content.
- 5.5 Bryanston (RFE) Ltd – The response queries the assessment of sites against objectives.
- 5.6 Barton Willmore – Provides a review of the document and suggests that more clarity is provided in relation to the methodology for assessing cumulative effects and whether all has been identified as well as mitigation measures.
- 5.7 PPC – **Treatment of alternatives and the SEA** – suggests that the DCC paper makes clear that the chosen site for the siting of a school is due to the strategy of the Neighbourhood Plan, which is not the case. It also questions why Site J has not been considered for a school and makes comments on NDDC's Issues and Options Consultation documents in terms of the approved areas of search the Neighbourhood Plan has used and why Area K had not been considered.
- 5.8 NDDC – Raises 3 requirements to the consideration of options set out by legislation and case law: identification of options; assessment of options; and reasons for selecting and rejecting the alternatives and suggests that

these need to be explained more clearly in the SA, not in the separate Site Selection Background Paper.

- 5.9 Historic England – The Report concentrates on Conservation Areas and their settings but does not mention other heritage assets such as listed buildings, including those on the local list.
- 5.10 The above comments have been noted and amendments have been suggested to AECOM where applicable. The AECOM NOTE, attached as Appendix A, sets out how comments will be addressed in the final version of the SA.

### **Site Selection Background Paper**

- 5.11 No comments were received on the Site Selection Background Paper which is a key piece of supporting evidence for the Plan. The plan should reinforce references to this key document.

**It is recommended that references within the plan to the Site Selection Background Paper are strengthened and it is referenced in the Basic Conditions Statement.**



## 6. Recommendations

6.1 It is recommended that:

- The policies and supporting text are amended as follows:
  - i. **The title of the plan** is amended as set out in 5.1 above;
  - ii. **The Foreword, and Section 1, 2 and 3 of the Plan** is updated to strengthen the emphasis on the purpose of the Plan to address infrastructure weaknesses in the northern part of the town;
  - iii. **Section 3 of the Plan** is updated in relation to removing references to the 2012 NPPF, the Waste Plan update received, and an update on the Pimperne Neighbourhood Plan is inserted;
  - iv. **Point k of the Vision** is clarified;
  - v. **Policy B2 is amended** to ensure there are no adverse effects from adjoining uses with the Waste Plan proposal, **criterion (i) is amended** in relation to housing types and this is reflected in the **supporting text**, measures to minimise the harm to designated heritage assets are included, references to the examiner's report of the Pimperne Neighbourhood Plan is removed from **paragraph 5.24** of the Pre-Submission Plan, and the policy removes the restriction of an application to be solely outline;
  - vi. **Policy B3 (c) is amended** to ensure there are no adverse effects from adjoining uses with the Waste Plan proposal and minimising light spill in the AONB are included. **The supporting text** to be updated to reflect the landowner's commitment to providing the land at Sunrise Business Park for employment uses;
  - vii. **Policies B11 – B13 are amended** to remove unnecessary references to sub areas;
  - viii. **Supporting text for Policy B14** is updated to reflect information in the Draft Conservation Area Appraisal;
  - ix. **Section 6 is amended** to clarify the position of CIL and S106 contributions; and
  - x. **An Inset Map is created** by transferring the proposed Local Green Spaces and Green Infrastructure Network from existing maps;
  - xi. **References to the Site Selection Background Paper** is strengthened throughout the plan.

6.2 Subject to the above amendments, and further supporting evidence outlined in the report, that the Blandford + Neighbourhood Plan 2011 – 2033 is finalised for submission for examination along with a Basic Conditions Statement, the production of the Final SA/SEA Report (incorporating comments as set out in the AECOM note attached as Appendix A), Site Selection Background Paper and the Consultation Statement.

## **Appendix A** – AECOM response to SA/SEA Regulation 14 comments

Organisation	Comment	How comment will be addressed in submission version of the SA Report
<b>Barton Wilmore</b>		
Cumulative effects	Cumulative effects have not been discussed sufficiently.	The submission version of the SA Report will include a distinct section on cumulative effects.
Mitigation measures	Mitigation measures should be summarised in a table to separate out what is already in the Neighbourhood Plan and what should be added	Recommendations included in the Reg 14 SA Report, and how they have been addressed, will be included in the submission version of the SA Report.
Assessment of reasonable alternatives	Suggests updates to the appraisal of options considered as reasonable alternatives, in particular a revisiting of rankings to improve the scorings for Option 1 and commentaries.	Will objectively review in light of comments. However these comments frequently suggest that mitigation and community infrastructure etc will be introduced which will limit the potential negative implications of development, as well as maximise positive effects. These are not elements which should be considered when comparing different options against each other in the SA process.
Monitoring	Suggests that additional information regarding monitoring should be included.	Further information on SA monitoring will be included in the submission version of the SA Report.
<b>Pimperne Parish Council</b>		
Assessment of reasonable alternatives	"The table on the attached sheet simplistically assigns a number value to each impact, and assesses the mean average. The SEA proposes that areas, A,B,E,F and J as possibly having some development potential – and the rest discounted. Yet it is clear from the table that site K (which is wholly within Pimperne Parish and therefore not able to be progressed through the Blandford + Neighbourhood Plan) scored more favourably, and sites C and D are not dissimilar in terms of their overall impact compared to F (although no land in area D appears to have been shown as available, and C is also outside of the Neighbourhood Plan area)."	The table referred to is not a component of the SA Report, and was not prepared through the SA process.
<b>Bryanston (RFE) Ltd</b>		
Assessment of reasonable alternatives	"The Sustainability Assessment should recognise the merits of River Stour Meadows and Lower Bryanston Farm as highly sustainable development options"	Will objectively review in light of comments received.
<b>Cranborne Chase AONB</b>		
NPPF	Mixing up of NPPF 2012 and 2018 in relation to landscape	Will review references to NPPF in relation to landscape.
Assessment findings in relation to landscape	"This document has a particularly helpful structure and it is relatively easy to follow the process. Nevertheless there are a number of shortcomings. For example, the assessments fail to address the loss of landscape flowing from the proposed development allocations."	Will review findings in light of comments.
Presentation of findings regarding landscape and the historic environment	"Again it is helpful to have the Sustainability Assessment set out in sections. However the division of topics does lead to a lack of focus on landscape issues. Combining 'landscape and historic environment' into a single topic mixes up the AONB landscapes with the Listed Buildings and Conservation Areas of the Town and villages. "	Further division between landscape character issues and historic environment elements will be included in the appraisal findings.
Unequal weight given to assessments in relation to the two AONBs	"there seems to be unequal weight given to the impacts of development in the two AONBs with a clearer and more explicit statement that development would have 'significant adverse effects on landscape character' in relation to the Dorset AONB and the less explicit 'likely damage to the special qualities of the AONB, impacting upon its inherent value and beauty' for the Cranborne Chase AONB. "	Will review findings in light of comments.
Appraisal findings	"section 5.22 to 5.31 avoids setting out an explicit statement of the impacts of the potential development on the AONBs. Paragraph 5.31 is contradictory where it states that the Neighbourhood Plan 'will lead to uncertain long term adverse effects in relation to the landscape and historic environment' and then states 'this has the potential to reduce the residual adverse effects'."	Will review findings in light of comments.
<b>NDDC (Oliver Rendle)</b>		
Text regarding the identification of options to assess as reasonable alternatives	"Overall, the identification of options is not entirely clear, lacks some detail, and is difficult to follow in parts"	Will review the wording to see whether the process and description of the options' formulation can be made clearer. However it should be noted that this is based on what was suggested, and it draws on the Local Plan. As such unsure as to the extent to which it can be augmented.
Reasons for selecting the preferred strategy	"The allocation to the north and north-east of Blandford was selected on the basis of the SEA scoring and the Local Plan policies B2 and B3. It provides no reasoning for rejecting options 2, 3 and 4."	The reasons for rejection of these options will be included. To request text from plan makers.
Cumulative effects	"The SEA doesn't appear to give any regard to the potential cumulative effects with development of this scale with existing development or approved development, for example through the Local Plan or existing permissions. Cumulative impacts are only mentioned with respect to the potential cumulative light pollution impacts with respect to options 3 and 4, and the in-combination effects with the existing Blandford Camp.	The submission version of the SA Report will include a distinct section on cumulative effects.
<b>Historic England</b>		
Longbourne House	Potential impacts on Grade II Listed Longbourne House (comment not on SA)	Comments will be reflected in historic environment assessments presented in the submission version of SA Report.

## **Appendix B** – Steering Group Statement on Blandford Camp

After lengthy discussions with senior officers on Blandford Camp the following information was given to the chair of B+ NP in November 2018. The following has been approved by the aforementioned senior officers:

*'The Ministry of Defence (MOD) has not stated any intention to dispose of Blandford Camp. The MOD is constantly reviewing its estate, and any decision that changes the current position will be formally announced through the relevant channels. Blandford Camp's inclusion in the DIO document was in error – there is no agreed or endorsed plan to close Blandford Camp, nor is there a statement of intent to do so in the near future. Most of the facilities within the DIO document are correctly listed as endorsed for disposal, but Blandford Camp is not one of them and therefore should not have been included within the document. Further investigations into the inclusion of the Camp in the document are being undertaken.'*

If the MOD decided to dispose of Blandford camp very quickly - the time scale of 2023 would be very ambitious because of the time necessary to fully close a large army camp.

Before the land or houses could be used for other purposes, notwithstanding the amount of time to move people and hardware, a large number of environmental surveys would need to be undertaken; surveys of the housing stock, landscape and soil etc.

Even if the camp were to close, any potential and suitable housing stock would not be able to be counted in strategic housing numbers until later in the decade. This would then be a matter for the DCC unitary authority in their strategic planning for the region.

It is concluded therefore, that the hypothetical closure of Blandford Camp will not in any way impact upon the aims of B+ Neighbourhood Plan to deliver infrastructure and housing for most of the plan period, if at all.

Roger Carter,

Chair B+ NP Working group  
Jan 4<sup>th</sup> 2019