

**Fiona Ajram**

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**From:** Stuart, David [REDACTED]  
**Sent:** 29 March 2019 19:49  
**To:** Planning Policy NDDC; Ed Gerry  
**Subject:** Blandford + Neighbourhood Plan 2011 - 2033  
**Attachments:** Blandford+ Neighbourhood Plan - Pre-Submission Statutory Consultation; RE: Blandford+ Neighbourhood Plan - Pre-Submission Statutory Consultation

FAO Ed Gerry

Dear Mr Gerry

Thank you for your Regulation 16 consultation on the submitted version of the Blandford + Neighbourhood Plan.

Our attention in previous responses has focused on policy B1 (now B2) which proposes a significant site allocation on the edge of the town. Our emphasis has been to highlight the need for appropriate evidence to demonstrate that relevant heritage considerations have featured in the policy formulation process in order to demonstrate conformity with national and local policy for the protection and enhancement of the historic environment.

We attach correspondence relating to the Regulation 14 consultation on the pre-submission version of the Plan which highlights the suggested likelihood of the site allocation causing harm to designated heritage assets and the need primarily to avoid this, or demonstrate that it is necessary in the interests of the public benefits it will deliver and the least harmful of the possible options available, and that any harm will be minimised and optimally mitigated.

We note that since our last correspondence additional reports have been produced or updated and submitted with the Plan (eg Sustainability Appraisal & Site Selection |background paper, both dated January 2019).

In the circumstances we are happy to leave consideration as to the appropriateness of the evidence base to support this policy to the discretion of your authority.

There are no other comments on the Plan we wish to make.

Kind regards

David Stuart

David Stuart | Historic Places Adviser South West  
Direct Line: [REDACTED] | Mobile: [REDACTED]

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<https://historicengland.org.uk/southwest>



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**From:** Ed Gerry [REDACTED]  
**Sent:** 15 February 2019 12:25  
**Subject:** Blandford + Neighbourhood Plan 2011 - 2033

Dear Sir/Madam,

Town and Country Planning, England: Neighbourhood Planning (General) Regulations 2012 (as amended)

In accordance with Regulation 16(b) of the above, I am notifying you that the **Blandford + Neighbourhood Plan 2011 - 2033** has been received by North Dorset District Council for submission to examination.

The proposed plan may be viewed from **15 February** to **29 March 2019** at:

- <https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/blandford-v2/blandford-neighbourhood-plan-version-2.aspx>
- Blandford Forum Town Council Offices, Church Lane, Blandford Forum, Dorset, DT11 7AD (during normal working hours)
- North Dorset District Council Offices, Nordon Lodge, 58 Salisbury Road, Blandford Forum, DT11 7LN (8.45am to 5.00pm Monday to Thursday and 8.45am to 4.00pm on Friday).
- Council Offices, South Walks House, South Walks Road, Dorchester, DT1 1UZ (8.30am to 5pm Monday to Thursday and 8.30am to 4.30pm on Friday)

Response forms are available on the District Council's website (details above) or on request from the Planning Policy Team (01258 484201). The deadline for responding to the consultation is **4pm on 29 March 2019**. Response forms should be sent to:

- [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk) **OR**
- Planning Policy Team (North Dorset), South Walks House, South Walks Road, Dorchester, Dorset, DT1 1UZ

Any comments may include a request to be notified of the Council's decision under Regulation 19 in relation to the neighbourhood plan. All comments will be made publicly available.

Kind regards,

**Edward Gerry**  
**Planning Policy Team Leader**

**Dorset Councils Partnership serving:**

North Dorset District Council, West Dorset District Council and Weymouth & Portland Borough Council

[REDACTED]  
[REDACTED]  
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## Fiona Ajram

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**From:** Stuart, David [REDACTED]  
**Sent:** 20 December 2018 15:42  
**To:** [REDACTED]  
**Cc:** Ed Gerry  
**Subject:** Blandford+ Neighbourhood Plan - Pre-Submission Statutory Consultation

FAO Sally Gardner

Dear Sally

Thank you for your Regulation 14 consultation on the Blandford+ Neighbourhood Plan 2. Our apologies for not responding before now.

In our previous responses to the original Plan we consistently drew attention to the need for evidence to demonstrate that appropriate account had been taken of relevant heritage considerations in the formulation of site allocation policies. In our final comment on this issue we referred to the outstanding need in this respect for Policy 1 – now Policy B1.

We have therefore looked at what new evidence may have been produced to address this issue in support of the carried forward provision in the new Plan. In doing so we note from the Examiner's Final Report observations that our advice had not taken into account the Heritage SEA Statement produced by Savills. I can confirm that in formulating our advice we took pains to take account of all documents which were available and formally associated with the Plan at each consultation stage. Our only record of a standalone Report produced by Savills is the Framework Masterplan.

In terms of the evidence available as part of the current consultation we note from the Plan's website that there is no Savills Report included in the suite of documents. We have also looked at the documents produced subsequent to the previous Examination and can find no additional heritage evidence which fully discharges our residual concern. The AECOM SA/SEA reports concentrate on the Conservation Areas and their settings as far as heritage considerations go but do not mention that other designated heritage assets, such as Listed Buildings, have been investigated or set out the methodology employed for doing so.

Our interest and concern is not to challenge or dispute the contents and conclusions of the Plan or its supporting documents but to ensure that adequate heritage evidence is in place to inform the Plan preparation process in accordance with the requirements for the protection and enhancement of the historic environment set out in the National Planning Policy Framework (NPPF). Should another Savills report provide the evidence we have identified a need for, for example, we would be happy to defer to North Dorset District Council and the Examiner as to its suitability in addressing that need.

Elsewhere in the Plan we note the new Policy B14 for The River Stour Meadows and commend the Plan and congratulate your community for its inclusion. Development interest in Crown Meadows has helped highlight the distinctive nature of this area and the important contribution it makes to the historic character and setting of the town. We note from the Examiner's Final Report the difficulties associated with formally designating this area a Local Green Space and support the approach taken by the Plan in seeking its protection and enhancement.

Otherwise, our congratulations to your community for its perseverance in preparing a Neighbourhood Plan for the Blandford area and our best wishes in taking it forward. Once made the Plan should provide an invaluable framework for managing the process of future change which reinforces and adds to the town's strengths, facilitating its regeneration.

Kind regards

David

David Stuart | Historic Places Adviser South West

Direct Line: [REDACTED] | Mobile: [REDACTED]

Historic England | [REDACTED]

<https://historicengland.org.uk/southwest>

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**From:** Sally Gardner [REDACTED]

**Sent:** 07 November 2018 10:16

**Subject:** Blandford+ Neighbourhood Plan - Pre-Submission Statutory Consultation



Sent Via Email Your Ref:

Our Ref: B+NP2 Pre-Sub Plan 18

Date: 6 November 2018

Dear Sir or Madam,

**Blandford+ Neighbourhood Plan 2 Pre-Submission Plan consultation**

I am writing to you as per the Neighbourhood Planning (General) Regulations 2012 Part 5 to request that you take a look at the Pre-Submission Blandford+ Neighbourhood Plan 2 (B+NP2) for Blandford Forum, Blandford St Mary, and Bryanston. You are being contacted because your organisation may have an interest in the content of the plan; or you may have previously commented on the Blandford+ Draft Plan.

An electronic copy is available to view or distribute to other members of your organisation on our website at <http://blandfordplus.org.uk/>

An on-line comments slip can also be found on the website. You can also respond to the consultation by emailing your response to [admin@blandfordforum-tc.gov.uk](mailto:admin@blandfordforum-tc.gov.uk) or by posting a copy to The Town Clerk's Office, Church Lane, Blandford Forum, Dorset, DT11 7AD.

I have attached a copy of the flyer that has been distributed to households and businesses in the Blandford+ area. If you support the plan, we would be very grateful if you could display this leaflet and share with your colleagues.

If you do wish to comment, please ensure that your response is submitted by Wednesday 19<sup>th</sup> December 2018.

If you have any enquiries regarding this matter, please email me via the email address above.

Please note as per the regulations quoted above your comments will be published online and therefore be available to download freely. Your personal contact details will be redacted before publication.

Yours Faithfully



Sally Gardner  
Facilitator for Blandford+

**Sally Gardner**  
Project Co-ordinator  
Blandford Forum Town  
Council  
Town Clerk's Office  
Church Lane  
Blandford Forum  
Dorset  
DT11 7AD



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Town Council**



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**From:** Stuart, David [REDACTED]  
**Sent:** 22 December 2018 17:25  
**To:** Sally Gardner  
**Subject:** RE: Blandford+ Neighbourhood Plan - Pre-Submission Statutory Consultation

Hi Sally

I have had a look at Appendix 8 of the Barton Wilmore report which relates to heritage considerations. This is a summary of a more substantial report carried out by CgMs, details of which are not here available.

The report is helpful in that it identifies that development of the site will generate a degree of harm to the Grade II Listed Longbourne House – the only designated heritage asset considered to be affected.

Understandably the heritage report is prepared in relation to the proposed masterplan. It concludes that the site plays a limited role in defining the setting of this asset and that as a consequence there will be limited harm (ie less than substantial) to its significance. It suggests that an understanding of that significance has influenced layout, design etc to mitigate that harmful effect but that presumably even with these responses a residual level of harm remains.

The summary report refers to relevant sections of the NPPF to highlight that where less than substantial harm occurs this should be weighed against public benefits and a balanced judgement taken. However, this ignores the overarching imperative in paragraph 193 to give great weight to the asset's conservation and paragraph 194 which requires clear and convincing justification for any harm.

So this takes us back to the site allocation within the Neighbourhood Plan and the need to demonstrate with evidence how the site contributes to the setting of relevant designated heritage assets, and how in the first instance any harm to that asset can be avoided – not mitigated. In this case, based on the summary of the CgMs report made available and without access to the methodology employed and assuming for now that Longbourne House may be the only designated heritage asset affected, can an area of land in this location be allocated for development in the Plan without causing harm? Is the issue a matter of principle ie not allocating land within the setting of the asset at all, or can the footprint, layout and overall design of any development be pursued in a way which avoids any harm?

While masterplanning of the proposed site allocation may be happening in parallel with Plan preparation it is the responsibility of the Plan to demonstrate that its policies are in conformity with national and local planning policy. The more specific and prescriptive the policy the more detailed the evidence needs to be. While the masterplan may ultimately be deemed an acceptable application of such a policy and its evidence used deductively to inform its formulation that masterplan may amount to being only one interpretation or version of the implementation of that policy and the policy needs to be drafted, evidenced and evaluated in its own right.

So, in conclusion, the Barton Wilmore report is useful as it does identify that a degree of harm to designated heritage assets will arise from the development of the site in question, highlighting where there was apparently a gap in the evidence base to date, as we have continued to emphasise. It would be helpful to have access to the full report in due course, and to understand how the community proposes to use that evidence in the formulation of the relevant site allocation policy in the Plan.

Kind regards

David

David Stuart | Historic Places Adviser South West

Direct Line: [REDACTED] | Mobile: [REDACTED]

Historic England [REDACTED]

<https://historicengland.org.uk/southwest>

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**From:** Sally Gardner [REDACTED]  
**Sent:** 21 December 2018 15:01  
**To:** Stuart, David  
**Subject:** RE: Blandford+ Neighbourhood Plan - Pre-Submission Statutory Consultation

Dear David,  
Thank you very much for your representation and for your support.

I have received the attached document from Barton Wilmore this morning and will upload to the B+ website as soon as I am able.  
Hopefully this will address the concerns you raise below - Appendix 8 is the exec summary for Heritage

Best wishes  
Sally

**Sally Gardner**  
Project Co-ordinator  
Blandford Forum Town  
Council  
Town Clerk's Office  
Church Lane  
Blandford Forum  
Dorset  
DT11 7AD



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**From:** Stuart, David [REDACTED]  
**Sent:** 20 December 2018 15:42  
**To:** Rachael Harding [REDACTED]



Cc: Ed Gerry [REDACTED]

Subject: Blandford+ Neighbourhood Plan - Pre-Submission Statutory Consultation

FAO Sally Gardner

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**From:** Sally Gardner [REDACTED]  
**Sent:** 07 November 2018 10:16  
**Subject:** Blandford+ Neighbourhood Plan - Pre-Submission Statutory Consultation



Sent Via Email

Your Ref:

Our Ref: B+NP2 Pre-Sub Plan 18

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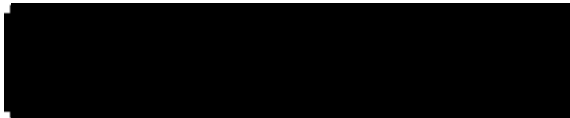
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Yours Faithfully



Sally Gardner  
Facilitator for Blandford+

**Sally Gardner**  
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