Representations in response to the Blandford + Neighbourhood Plan 2 Submission Consultation

On Behalf of Wyatt Homes (Lewis Wyatt Construction Ltd) and landowners (The West Pimperne Pool Trust, Mr C Coats and Mr T Coats)

March 2019



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Project Ref:	28458/A3/LV/AD	28458/A3/LV/AD	28458/A3/LV/AD
Status:	Draft	Draft	Final
Issue/Rev:	P1	P1a	P1b
Date:	15/03/2019	25/03/2019	29/03/2019
Prepared by:	LV/AD	LV/AD	LV/AD
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Date: March 2019

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Appendix 1 Representations to Pre-submission Neighbourhood Plan

1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore on behalf of our clients, house builder Wyatt Homes (Lewis Wyatt Construction Ltd) and landowners (The West Pimpeme Pool Trust, Mr C Coats and Mr T Coats), in response to the submission version of the Blandford + Neighbourhood Plan 2 (2011-2033). The Neighbourhood Plan was submitted to North Dorset District Council in January 2019 and is currently subject to public consultation.
- 1.2 Barton Willmore submitted representations to the pre-submission Neighbourhood Plan which was subject to public consultation in December 2018. Our comments contained within those representations remain relevant and should be read alongside these representations. Our previous representations are attached at Appendix 1. The following reinforces our views and provides further comment on any amendments to the Neighbourhood Plan.
- 1.3 We support the Neighbourhood Plan's vision, objectives and approach to the location of new housing within the Neighbourhood Plan area. We consider the Neighbourhood Plan has been well prepared and will meet the housing needs of the Blandford area as well as contribute to North Dorset District Council's (NDDC's) housing supply. Furthermore, we strongly support the allocation of land under the control of our clients to the north and east of Blandford for a residential-led mixed-use development (Policy B2).
- 1.4 The remainder of this document sets out our comments on the Neighbourhood Plan's vision, objectives and policies, the Sustainability Appraisal and the Neighbourhood Plan's evidence base.

2.0 RESPONSE TO CONSULTATION

Blandford + Vision and Objectives

- 2.1 We support the Neighbourhood Plan's vision and objectives set out at Section 5 of the submission Neighbourhood Plan. It is encouraging to see that Blandford is planning to grow sustainably over the Plan period through both new development and redevelopment within the defined settlement boundary.
- 2.2 We note the addition, at criterion a), of the ambition to deliver a new primary school to the north and east of Blandford Forum. We support the recognition of this, which will help Blandford Forum grow sustainably and deliver much needed educational capacity in the northern part of the town. The Blandford Town Pupil Place Planning Statement (updated 2019) sets out that the area has been subject to a significant increase in pupil numbers which has been historically managed through the temporary extension of Milldown Primary. However, this is obviously a temporary solution and a more permanent solution needs to be found. Milldown School can no longer absorb temporary buildings to accommodate the existing number of children requiring school places. In addition to this, Table A of the Neighbourhood Plan Basic Conditions Statement sets out that the need for primary school places in Blandford is now critical.
- 2.3 As recognised in the Neighbourhood Plan, a new primary school can be delivered as part of the development at land to the north and north east of Blandford Forum, which falls under the control of our clients.
- 2.4 The vision sets out that the Neighbourhood Plan will help meet local housing needs by providing at least 1,700 homes in Blandford area over the Plan period (2011-2033). As per our previous comments, we support the provision of new homes to meet local housing needs. We emphasise that the figure in the Neighbourhood Plan should be seen as a minimum to ensure the housing requirement is high enough to meet the identified housing need and allow existing and future communities to thrive. Viewing the housing figure as a minimum would be in accordance with paragraph 11 b) of the revised National Planning Policy Framework (NPPF) (February 2019), which requires strategic policies, as a minimum, to provide for objectively assessed needs for housing.

- 2.5 Criterion c) to e) of the Submission Neighbourhood Plan's Vision set out how new development should protect and enhance Blandford's special landscape and historic assets. Such measures include how to minimise the visual impact of development, how sites should be strategically landscaped and how the height of development should be limited to reduce its impact on the surrounding landscape. We agree with this approach, given the special qualities of the town's landscape and its historic assets.
- 2.6 With specific reference to our client's land, the Review of Potential Site Allocations submitted in support of our pre-submission representations (Appendix 3) sets out several measures to mitigate the visual impact of development at the site. The proposed development will be designed to provide strategic landscaping which will allow the development to integrate well into the existing built form in Blandford and the surrounding landscape. The proposed development can maintain its relatively contained visual envelope by maintaining and enhancing the boundary woodland and hedgerows and establishing further such planting. The land under control of our client to the north and east of Blandford can therefore be developed sensitively to protect and, where possible, enhance any heritage assets and the neighbouring Area of Outstanding Natural Beauty (AONB).
- 2.7 Criterion j) of the submission Neighbourhood Plan, sets out that to meet the housing needs of Blandford, the development to the north and east of the settlement will deliver a new primary school which is required to accommodate existing and future pupils in Blandford. As aforementioned, we support the delivery of both residential development and the new primary school at land to the north and east of Blandford Forum. Criterion u) set out a requirement for the provision of at least a 2FE new primary school on this land, which is supported.
- 2.8 Please refer to paragraphs 2.5 to 2.9 of our pre-submission representations for further detailed comments, which remain relevant, including our support for the remaining criterion of the **Neighbourhood Plan's** vision.
- 2.9 Of particular relevance, with reference to criterion v), while we support the provision of new or improvement of existing GP facilities, such facilities should only be provided where there is an identified need, as demonstrated by appropriate evidence to be gathered in consultation with the Dorset Clinical Commissioning Group (DCCG). Both the Neighbourhood Plan Group and Dorse Council will need to be satisfied through engagement with the NHS and DCCG that that there is an identified need for such a facility. The Health Background Note recognises the need for a new health and wellbeing facility which would support and reduce pressure on existing GP facilities.

There is scope for its delivery on our client's land to the north and east of Blandford Forum.

Policy B1 – Blandford Forum and Blandford St. Mary Settlement Boundary

2.10 As set out in our previous representations, we support the revised settlement boundary of Blandford Forum and Blandford St Mary as shown on the Policies Map. Please refer to our previous representations for further comments on Policy B1.

Policy B2 – Land North and East of Blandford Forum

- 2.11 We strongly support the allocation of the land north and east of Blandford Forum for a mixed-use scheme including residential, education, community and allotment uses.
- 2.12 In addition to our comments on the pre-submission neighbourhood plan, we specifically note the following.
- 2.13 In accordance with paragraph 2.16 of our previous representations, it is helpful that the Neighbourhood Plan consistently refers to "approximately 400 dwellings" throughout the Plan.
- 2.14 We support the amendments that have been made to Criterion i) of the Policy. However, as explained in our previous representations (paragraph 2.15), while 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, we feel that further amendments to the wording of the policy are required to ensure that is fully consistent with the NPPF. We therefore recommend the following amendments to criterion i):

"The residential scheme comprises approximately 400 dwellings including a mix of open market, affordable homes for rent and affordable homes for sale (including housing that provides a subsidies route to home ownership), affordable and self-build and custom homes, primarily located on land to the north-east of Blandford Forum;"

2.15 Criterion iii) of Policy B2 has been revised to ensure that the new primary school is of a 'low rise' form. It is important that the new primary school is suitably integrated with the remainder of the development, as well as being sensitively designed, given its location within the AONB. The design of the school, particularly its bulk, scale and mass, will be informed by the existing ground levels to ensure that an appropriate relationship can be achieved. We therefore consider that the term 'low rise' should be deleted from the policy as it is not necessary. The Draft Illustrative Framework Masterplan, submitted as part of our previous representations, details how a new two form entry primary school can be delivered, with room to expand to a three-form entry school if required. Paragraph 5.16 of the Submission Neighbourhood Plan sets out that the school is considered to be a vital benefit and that the national priority given to the provision of school places by government justifies the incursion of a major development into the AONB. This approach is in accordance with paragraph 172 of the NPPF (2019), which places great weight on conserving the landscape and scenic beauty of such designated landscapes. However, major development is allowed in the AONB where exceptional circumstances can be demonstrated. We consider that such exceptional circumstances are present in this instance to allow for a new school to be built within the AONB.

- 2.16 We note that criterion iv) has been amended to state that the community hub scheme should comprise a new health and wellbeing facility, as opposed to a new general practice facility. We understand this amendment is a result of the findings of the Health Background Note which sets out there is a demonstrable need for a new health facility as there will be an influx of patients and the population in Blandford and the surrounding area has a high proportion of people aged 65 and over.
- 2.17 The note sets out that building a new health and wellbeing centre would increase the health and well-being of patients which would result in a reduced demand on medical and social care services and is sustainable going forward. We support the provision of such a facility and believe it will help to achieve a healthy and inclusive place in accordance with paragraph 91 of the NPPF. The provision of such a facility is dependent on a need being identified through evidence from the NHS and DCCG.
- 2.18 Criterion viii) has been amended to ensure that the design and landscape scheme comprises measures to satisfactorily minimise harm to the Grade II listed Langbourne House. Our review of potential site allocations submitted as Appendix 3 of our previous representations sets out a series of mitigation measures to minimise impacts of the proposals on the AONB and integrate the scheme into the landscape. A Heritage Assessment has been undertaken to assess the impact of the proposed development on the site. The assessment concluded that the site makes a negligible contribution to the significance of the heritage asset. The Design and Access Statement and Landscape Strategy submitted as part of a future planning application will ensure that any adverse harm to the nearby listed building and AONB will be satisfactorily mitigated.

- 2.19 Policy B2 at criterion xi) has been amended to ensure that the illustrative masterplan submitted with a planning application will demonstrate that the proposals would not adversely impact on the operation of a waste management centre on adjoining land. We will ensure that, through a carefully planned masterplan, the new development proposed at the land north and east of Blandford will not have an adverse impact on the operation of the proposed waste management site to the west of the proposed development.
- 2.20 We support the Neighbourhood Plan's revised approach regarding their desired type of planning application to bring forward the land north and east of Blandford. As set out in our previous representations, a hybrid application (part full, part outline), as opposed to an outline application, would allow for a section of the site to come forward in detail, providing certainty as to what will be delivered on the site. Such a planning application could also speed up the delivery of the site, enabling homes to come forward faster in the Plan period.
- 2.21 In summary, the site supported by Policy B2 offers a unique opportunity to continue the historic growth of Blandford and integrate into the existing town whilst providing a gateway and a cohesive approach to housing, economic uses and community facilities and services. The allocation will provide much needed homes and facilities in Blandford whilst supporting existing local facilities and services in the town centre. The submission of a hybrid planning application could expedite the rate of housing delivery which will help contribute to **North Dorset's** five-year housing land supply.
- 2.22 As set out in the supporting text of Policy B2, in addition to the delivery of housing, the allocation would deliver other vital land uses and infrastructure to help meet the needs of Blandford. The land north and east of Blandford Forum would help meet **North Dorset's housing need** whilst providing a school as required by Policies 14 and 16 of the currently adopted Local Plan and other significant benefits to the local community, including the provision of a new health and wellbeing centre.
- 2.23 It is considered that the allocation of the land north and east of Blandford Forum is proportionate to the existing development within the town and is in a sustainable location to enable the settlement's services and facilities to be supported throughout the Neighbourhood Plan period and beyond.

Policy B3 – Employment

2.24 The Submission Neighbourhood Plan requires any extension to the Sunrise Business Park to demonstrate that the proposed uses would not adversely impact on the operation of a waste management centre on adjoining land. Whilst each site will be brought forward independently, the sites will need to be master planned appropriately to consider the relationship between the sites as well as with the mixed-use development at land north and north-east of Blandford allocated in Policy B2.

Policy B4 - Secondary Education

2.25 As set out in our representations to the pre-submission Neighbourhood Plan, we support the expansion of the secondary school in Blandford. However, the extension should be based on future population projections to ensure the correct level of growth is provided for. The expansion of the secondary school should also be in accordance with the Blandford Town Pupil Place Planning Statement which sets out that "secondary demand would rise by 18 pupils per year in the Year 7-11 cohort with an additional thirty-six 6th form places being required. These would be provided through expansion of The Blandford School, though developer contributions would be required to resource this level of expansion at the school."

Policy B5 – Community Facilities

2.26 We support the retention of the community facilities set out in the Neighbourhood Plan. As previously mentioned, the allocation to the land north and east of Blandford Forum will contribute to **Blandford's** community facilities through the relocation of the allotments and the provision of a new community hub incorporating a health and wellbeing centre in a sustainable location. As set out in the Neighbourhood Plan Basic Conditions Statement, the need to relocate the allotments on the site has arisen simply to provide the ability for effective masterplanning to take place on the site to allow for measures to be implemented to moderate the effect of development on the landscape.

Policy B7 – Health Provision

2.27 Policy B7 sets out that all new residential development proposals will only be permitted where they provide or improve the delivery of essential health and/or wellbeing facilities and services required to serve the scale of development proposed. This approach is accepted and deemed sensible and is supported by the identified need set out in the Health Background Note. Whilst the need for expanded health

facilities in Blandford is recognised in the North Dorset Local Plan, the Basic Conditions Statement confirms that subsequent meetings with the local GP surgeries and the Dorset CCG confirm that the need for new health care facilities remains the case. As noted above, this need should be identified and confirmed with the NHS and DCCG. The emerging strategy to accommodate this need is to upgrade the existing GP services in the town and seek the provision of satellite facilities to deliver services that do not require a specific GP setting, thereby freeing up space in the GP surgeries to meet additional needs.

2.28 We note that a Health Background note has been submitted as part of the Submission Neighbourhood Plan and recognises the need for satellite health service provision. We support the provision of a new health and wellbeing centre as part of the proposals at the land to the north and east of Blandford. Appropriate contributions towards this centre would be provided through a Section 106 agreement at planning application stage.

Policy B8 – Blandford Forum Town Centre

2.29 We note that there have been no changes to Policy B8. As set out in our previous representations, we support the Neighbourhood Plan's ambition to support new proposals that will contribute to the vibrancy and vitality of Blandford's Town Centre.

Policy B9 – Green Infrastructure Network

2.30 The maintenance and enhancement of the Green Infrastructure Network in Blandford is supported. The proposed allocation at land north and east of Blandford will provide new pedestrian and cycle links as set out in the representations to the pre-submission Neighbourhood Plan. New pedestrian and cycleways will present an opportunity to link the new development to Blandford Town Centre and the wider countryside.

Policy B10 - Local Green Spaces

2.31 The Neighbourhood Plan designates several local green spaces within Blandford. In addition to these existing green spaces, as noted in our earlier representations, the allocation at land to the north and east of Blandford Forum can provide a range of public open spaces for the use of both existing and future residents, as well as linking the existing with the proposed infrastructure network in Blandford.

Sustainability Appraisal for the Blandford + Neighbourhood Plan

2.32 A Sustainability Appraisal (SA) (November 2018) was prepared by AECOM in support of the pre-submission Neighbourhood Plan. Appendix 2 of our representations to the presubmission Neighbourhood Plan provides a review of the Blandford + SA. This concerned the degree to which the SA met the regulatory requirements, as well as providing a site-specific review of SA ranking applied to the four development options considered in the SA. We make the following comments following publication of an updated SA (January 2019), which has been submitted in support of the submission version of the Blandford + Neighbourhood Plan.

SA Review

- 2.33 Paragraph 2.3 of our SA Review explains that it would be helpful for the final SA Report to explain how cumulative effects have been assessed. We are pleased to see that the Submission SA includes a new section in Chapter 5 regarding cumulative effects. This section sets out the potential effects, both positive and negative, which may occur as a result of the in-combination effects of the Neighbourhood Plan proposals and other plans in the area. We support the inclusion of this section in the SA.
- 2.34 Our previous comments (paragraphs 2.4-2.5) also highlight that it would be helpful for the mitigation measures to be summarised in a table to separate out what is already in the Neighbourhood Plan and what should be added. We acknowledge that the SA includes suggested mitigation in the main body of text, but there is no dedicated section in the SA for mitigation measures. Whilst this is not essential it would be helpful for ease of reference, as explained previously.
- 2.35 Furthermore, Appendix 1 to our SA Review highlighted that there were no measures set out for monitoring in the SA as the Plan was only published for consultation not adoption. The submission SA includes a monitoring programme for the SA at chapter
 6. We believe the monitoring programme set out in the SA is robust and will adequately serve its purpose and as such we have no further comments.
- 2.36 As previously mentioned, there are no major deficiencies in the SA however there were areas which required further detail and explanation. We believe that the submission SA has now provided more detail and explanation of the SA process, and in particular the monitoring of the SA. We therefore believe the SA is robust having regard to the regulatory requirements.

Site Specific Review

- 2.37 Section 3 of our SA Review, which is to be read alongside Appendix 2 of the Review, sets out suggested revisions to the ranking of **our client's land which forms** option 1 (land north and east of Blandford Forum) by providing justification, supported by evidence, for our revised SA rankings.
- 2.38 Unfortunately, it is apparent that our suggested revisions have not been included in the submission SA. We note that all rankings for each theme remain the same as the November 2018 SA, with the exception of the "Landscape and historic environment" theme. This theme has been divided into "Landscape and historic environment: Landscape" and "Landscape and historic environment: Historic environment". Option 1 scores a "2" for the former and a "1" for the latter, with "1" being the most favourable ranking and "4" being the least favourable ranking. Option 1 previously scored a "1" for the "Landscape and historic environment" theme and so its sustainability has been reduced, contrary to the evidence provided in our representations. We believe that the scores should be re-considered to reflect our comments set out in this response and our previous representations (Appendix 1).
- 2.39 Whilst this is disappointing, we still believe that option 1 is the most appropriate option for growth as it scores far better than any of the three other options.
- 2.40 Option 1 will provide a sustainable growth option for the Neighbourhood Plan through the provision of benefits for both the existing residents of Blandford and future residents, a comprehensive green and blue infrastructure strategy and a comprehensive landscape strategy.

Supporting documents

- 2.41 We note that our representations in response to the pre-submission Neighbourhood Plan are available to view online. While these contain at Appendix 3 a review of the potential site allocations, prepared by Hankinson Duckett Associates, we feel that it would be beneficial for this to be listed as part of **the Neighbourhood Plan's supporting** documents.
- 2.42 In addition, we have recently provided the Town Council with a Technical Note in support of Policy B2 that allocates our client's land to the north and east of Blandford Forum for development. While this is also available online as part of the consultation responses received on the pre-submission Neighbourhood Plan, we feel that it would also be helpful for it to be included in the list of supporting documents.

2.43 This is because these two documents provide valuable evidence in support of the Neighbourhood Plan and its allocations and would also assist with the Examination of the Neighbourhood Plan.

Basic conditions

- 2.44 To enable the Neighbourhood Plan to progress to referendum following examination, it will be necessary to satisfy the 'basic conditions' set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990.
- 2.45 We believe that the Neighbourhood Plan has been positively prepared to support, shape and direct new development within Blandford with the achievement of sustainable development at the forefront. The Blandford + Submission Neighbourhood Plan provides for development in accordance with the North Dorset District Local Plan, and is therefore considered to be in accordance with the NPPF, in particular paragraph 29.
- 2.46 In the context of the above, and the amendments which have been made in accordance with our comments made in our previous representations, it is considered that the Neighbourhood Plan meets the basic conditions required to proceed to referendum in accordance with paragraph 37 of the NPPF.

3.0 CONCLUSIONS

- 3.1 Overall, having regard to these representations, which are to be read alongside the more detailed comments within our previous pre-submission representations, we consider that the submission Blandford + Neighbourhood Plan 2 has been well prepared and will meet the housing needs of the Blandford area whilst contributing to the District's housing land supply. The Neighbourhood Plan allocates deliverable sites in sustainable locations which have good access to employment, local services and facilities. The allocated sites also have the potential to provide further facilities and services to the residents of the Blandford area.
- 3.2 The land north and east of Blandford Forum, allocated by Policy B2 for a residentialled mixed-use development, is in a sustainable, accessible location. The site will provide significant community benefits including the provision of a new primary school; relocated allotments; a community hub including a new health and wellbeing centre; affordable homes and public open space. The site will also contribute to **Blandford's green infrastructure network**, provide new pedestrian and cycle ways, and the future residents will contribute to the local economy and the vitality of the town centre. It is therefore considered that the site's allocation would lead to the achievement of sustainable development, having regard to the three objectives of sustainable development: economic, social and environmental, as set out at paragraph 8 of the NPPF.
- 3.3 Whilst we understand the allocation of the section of the site within Pimperne Parish is out of the Blandford + Neighbourhood Plan's control, we would like to highlight that this land is available, deliverable and developable and would not have a detrimental impact on the gap between Pimperne and Blandford.
- 3.4 Overall, the Submission Blandford + Neighbourhood Plan has been amended to ensure consistency and clarity. We consider that the Neighbourhood Plan is robust and meets the basic conditions required of a Neighbourhood Plan. However, we believe that making the minor amendments that we have suggested in these representations and previous representations would ensure that the Neighbourhood Plan is fully clear. We consider that the Neighbourhood Plan should proceed to referendum without delay.
- 3.5 We trust that the representations provided in the above are helpful in the examination of the Blandford + Neighbourhood Plan. If Blandford Forum Town Council, Dorset District Council, and / or the Neighbourhood Plan Examiner would consider it beneficial

to discuss the representations provided further, then please do not hesitate to contact us.

Next Steps

- 3.6 Our clients are currently in the process of preparing a hybrid planning application for the development of the land to the north and east of Blandford, as allocated by Policy B2 of the Neighbourhood Plan.
- 3.7 Our clients are committed to continue engaging with the Town Council to ensure the development proposed is in accordance with the Neighbourhood Plan's vision, objectives and policy.

Wyatt Homes – commitment to quality and delivery

- 3.8 Wyatt Homes (Lewis Wyatt Construction Ltd) is a long established and privately-owned house building company, based in the South West.
- 3.9 The company's aim is to design and build properties of exceptional quality, without compromising on material or attention to detail. With this focus, the high-quality homes and places designed and built by Wyatt Homes over the past quarter of a century have brought satisfaction to their occupiers and enhanced the character of local communities.
- 3.10 Wider recognition has also been achieved through the awards the company has won for exemplary quality, design and craftsmanship. One example of such an award is Wyatt Homes recently winning Housebuilder of the Year at the 2018 South Coast Property Awards.
- 3.11 Wyatt Homes have built many high-quality homes in Dorset over the last few years including homes at Oakbourne and Charminster Farm.
- 3.12 Wyatt Homes is exceptionally well placed to assure quality of design and timely delivery of new homes and community facilities at north east Blandford.

Appendix 1

Representations to Pre-submission Neighbourhood Plan

Representations in response to the Blandford + Neighbourhood Plan 2 Pre-submission Consultation

On Behalf of Wyatt Homes (Lewis Wyatt Construction Ltd) and landowners (The West Pimperne Pool Trust, Mr C Coats and Mr T Coats)

December 2018



Representations in response to the Blandford + Neighbourhood Plan 2 Pre-submission Consultation

On behalf of Wyatt Homes (Lewis Wyatt Construction Ltd) and landowners (The West Pimperne Pool Trust, Mr C Coats and Mr T Coats)

Project Ref:	28458/A3/LV/AD	28458/A3/LV/AD	28458/A3/LV/AD
Status:	Draft	Draft	Final
Issue/Rev:	P1	P1A	P1B
Date:	07/12/2018	17/12/2018	19/12/2018
Prepared by:	LV/AD	LV/AD	LV/AD
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Ref: 28458/A3/LV/AD

Date: December 2018

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APPENDICES

- 1.0 Draft Illustrative Framework Masterplan and Green Infrastructure Masterplan
- 2.0 Review of Blandford + Sustainability Appraisal
- 3.0 Review of Potential Site Allocations

1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore on behalf of Wyatt Homes (Lewis Wyatt Construction Ltd) and landowners (The West Pimpeme Pool Trust, Mr C Coats and Mr T Coats) in response to the Pre-submission version of the Blandford + Neighbourhood Plan 2 (2011-2033), which is currently subject to public consultation.
- 1.2 We support **the Neighbourhood Plan's vision**, objectives and approach to the location of new housing within the Neighbourhood Plan area. We consider the Neighbourhood Plan has been well prepared and will meet the housing needs of Blandford as well as contribute to North Dorset District Council's (NDDC's) housing supply.
- 1.3 The following sets out our comments on the **Neighbourhood Plan's vision, objectives and** policies.
- 1.4 These representations are accompanied by the following, which are included as appendices:
 - A Draft Illustrative Framework Masterplan to demonstrate how the various uses set out in Policy B2 can be delivered, prepared by New Masterplanning, alongside a draft Green Infrastructure Masterplan, prepared by Hankinson Duckett Associates (Appendix 1).
 - A separate report reviewing the Sustainability Appraisal in support of the Neighbourhood Plan, prepared by Barton Willmore (Appendix 2).
 - A review of the potential site allocations, prepared by Hankinson Duckett Associates (Appendix 3).

2.0 Response to Consultation

Blandford + Vision and Objectives

- 2.1 We support the Neighbourhood Plan's vision and objectives. It is encouraging to see that Blandford is ambitiously planning to grow sustainably over the plan period through both new development and redevelopment within the defined settlement boundary.
- 2.2 The vision sets out that the Neighbourhood Plan will help meet local housing needs by providing at least 1,700 homes in Blandford Forum and Blandford St Mary during the period 2011-2033. We support the provision of new homes to meet local housing needs and emphasise that the figure in the Neighbourhood Plan should be seen as a minimum to ensure the housing requirement is high enough to meet the identified housing need and allow existing and future communities to thrive.
- 2.3 The vision sets out that in addition to infilling and redevelopment within the settlement boundary, **Blandford's housing need will be met through the development of the** Land North and East of Blandford Forum. **We support the Neighbourhood Plan's proactive** approach to identifying strategic sites to accommodate the additional homes to meet the areas future growth.
- 2.4 **Criterion d) to f) of the Blandford + Neighbourhood Plan's** Vision set out how the site should be development to minimise its visual impact, how the site should be strategically landscaped and how the height of development should be limited to reduce its impact on the surrounding landscape. The Review of Potential Site Allocations submitted in support of these representations sets out several measures which will help to mitigate the visual intrusion of the development will be designed to provide strategic landscaping which will allow the development to integrate well into the existing built form in Blandford and the surrounding landscape. The proposed development can maintain its relatively contained visual envelope by maintaining and enhancing the boundary woodland and establishing further woodland planting.
- 2.5 Blandford + Neighbourhood Plan's vision sets out proposed improvements to community infrastructure. Criterion p. requires the provision and enhancements of pedestrian and cycle links between new and existing development in Blandford. The allocation at Policy B2 will provide links to the existing development in Blandford as well as providing links to key destinations such as the Town Centre, allotments, public open space, the new school and community facilities. This will integrate the existing community with the new

residents and associated development proposed on the Land North and East of Blandford Forum.

- 2.6 The Neighbourhood Plan's vision also sets out social infrastructure requirements to support the sustainable growth of Blandford over the plan period and meet the needs of the local community. Criterion v. requires the provision of at least a new two-form entry primary school at Land North and East of Blandford Forum, which is supported. The allocation at Policy B2 will facilitate the provision of this school.
- 2.7 Criterion w. of the vision sets out that new or improved GP facilities and services will be required from all new residential development. Whilst we support the provision of new or improvement of existing GP facilities, such facilities should only be provided where there is an identified need, as demonstrated by appropriate evidence to be gathered in consultation with the Dorset Clinical Commissioning Group.
- 2.8 From discussions with NDDC it appears that there is no identified need for a new GP facility in Blandford. However, a GP facility could be provided on the Land North and East of Blandford Forum if a need is identified. If there is no need for a new facility but there is a need for existing facilities to be improved, a financial contribution from the proposed development can be secured via the Community Infrastructure Levy or a Section 106 agreement.
- 2.9 A network of green infrastructure will be developed in Blandford over the plan period. The allocation of Land North and East of Blandford Forum will contribute to the green infrastructure network by providing informal public open space and links to the surrounding green infrastructure network.

Policy B1 - Blandford Forum and Blandford St. Mary Settlement Boundary

- 2.10 We support the revised settlement boundary of Blandford Forum and Blandford St Mary as shown on the Policies Map. The amendments allow the settlement to grow sustainably in accordance with the Neighbourhood Plan's vision, while managing the development proposals in accordance with the Plan's strategic policies for settlements and the countryside.
- 2.11 The extension of the settlement boundary to the north and east of Blandford will allow land in this location to come forward under Policy B2. This will enable the Neighbourhood Plan to fully address the requirements of the 'land use specification' agreed between the District and Parish Councils, as outlined in paragraph 3.13 of the Plan.

2.12 Paragraph 5.10 of the Neighbourhood Plan sets out that the land available to the North and East of Blandford Forum extends beyond the town boundary into the neighbouring Parish of Pimperne, which falls outside of the Neighbourhood Plan area. Whilst we acknowledge that a Neighbourhood Plan cannot allocate land for development outside of its Neighbourhood Plan area, the additional land represents a logical extension to Blandford and would not cause detrimental harm to the gap between the two settlements.

Policy B2 - Land North and East of Blandford Forum

- 2.13 We support the allocation of the Land North and East of Blandford Forum for a mixeduse scheme including residential, education, community and allotment uses.
- 2.14 Policy B2 sets out that the residential element of the scheme will comprise approximately 400 dwellings. Whilst we support the residential element of the scheme and the provision of a mix of housing type, size and tenure, we consider that the number of dwellings should not be limited for the sake of limitation and should instead be guided through the careful master planning of the site. The density of the residential element of the site will be informed by an analysis of the existing residential character in Blandford and take account of its setting, constraints, etc. The Draft Illustrative Framework Masterplan included at Appendix 1 sets out how the allocation can be developed to provide approximately 400 homes within the Blandford + Neighbourhood Plan Area, alongside other uses.
- 2.15 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. The following amendments to criterion i. are therefore suggested:

"The residential scheme comprises approx. 400 dwellings including <u>a mix of</u> open market, <u>affordable homes for rent and affordable homes for sale (including housing that provides a</u> <u>subsidies route to home ownership)</u> starter, affordable rent and self-build homes, primarily located on land to the north-**east of Blandford Forum;**"

2.16 Furthermore, as a point of clarity, paragraph 5.16 states that the allocation will provide 'at least' 400 homes whereas criterion i. states that the scheme should provide 'approximately 400 homes'. We would be grateful if the Neighbourhood Plan could clarify the correct wording to avoid any ambiguity. We would suggest using 'at least / a minimum of 400 homes' for the purpose of the policy and its supporting text.

- 2.17 We recognise the need for a new primary school in Blandford Forum and support the inclusion of the school in the allocation. The Draft Illustrative Framework Masterplan details how a new two form entry primary school can be provided in the western section of the site. There is also room to enable the school to expand to a three-form entry in line with the requirements of Dorset County Council should this be needed in the future as set out in criterion iii) of Policy B2. The scheme has been designed to utilise the existing A350 pedestrian bridge for access to the school and allotments. This will ensure these facilities are well connected to the existing built-up area of Blandford Forum. This pedestrian link will also provide access to areas of public open space and provide an enhancement to the local green infrastructure network.
- 2.18 The Draft Illustrative Framework Masterplan details a community hub in the heart of the development. The community hub can provide a range of facilities in accordance with any identified local need. Whilst criterion iv) requires a new GP facility to be provided, as noted earlier, the need for a new GP surgery in Blandford needs to be demonstrated.
- 2.19 The Draft Illustrative Framework Masterplan details how the allotments can be relocated to the western section of the site, alongside the provision of ancillary facilities. This would include like-for-like provision as a minimum.
- 2.20 With regard to criterion vi, access to the southern area of the development could be facilitated via a new roundabout on the A354 Blandford Bypass. As well as providing sufficient traffic capacity, this would introduce a physical measure to reduce vehicle speeds along the route. Manual for Streets 2 also highlights that "*Roundabouts typically have the lowest rate and severity of motor vehicle collisions and cause low levels of traffic delay, and therefore reduced vehicle emissions".* The access for the northern portion of the site could be provided from a simple priority junction at the location of the existing access to the allotments site where suitable visibility splays would be available. The combined approach is therefore considered appropriate to satisfactorily manage the effects of development on the highway adjacent to the site.
- 2.21 The access strategy also includes measures to encourage safe and convenient walking and cycling through the neighbourhood. These include: improved pedestrian and cycling facilities at Hill Top Roundabout; reuse of the existing pedestrian access bridge over the A350 to provide active travel options to the northern portion of the site; a new link across the A354 to Preetz Way and a footway along the A354 to the south, providing a connection to Black Lane. These additional or improved active travel links would provide connectivity with existing pedestrian and cycle infrastructure around Blandford Forum to destinations including the town centre, Larksmead recreation ground, existing employment zones and Pimperne Brook. It would also enable residents of the existing

neighbourhood to the west of the bypass to access the proposed community facilitates within the new development.

- 2.22 Any future planning application would be accompanied by a Transport Assessment that would test the capacity of the local road network with the estimated development traffic. This would include proposals for any appropriate mitigation measures to manage the off-site traffic impacts. The overall highways/transport strategy for the site would be subject to consultation with the local Highway Authority in the usual manner, with any necessary planning obligations to improve local infrastructure secured through the S106 Agreement.
- 2.23 Regarding criterion vii, currently bus service 20, from Blandford Forum to Salisbury, runs along Salisbury Road between the two parcels of land that make up the site. Service X8 and X8a are also available from Shottesford Avenue, Salisbury Road and Larksmead. Both of these routes, which provide a combined frequency of up to 4 buses an hour into **Blandford town centre, would be accessible within around 5 to 10 minutes' walk from all** areas of the development site, taking advantage of the new pedestrian infrastructure that would be provided to enhance connectivity across the bypass. Improvements to the physical public transport infrastructure could take the form of enhancements to the existing bus stops to provide more attractive waiting facilities.
- 2.24 The main spine road of the larger southern area of development could be designed so that it forms a loop to enable the passage of a bus around the development, without the need to turn around/reverse or return to the bypass along the same street. This would enable bus operators to efficiently route existing services through the development, or create additional commercial services, to take advantage of the additional potential patronage the scheme would generate. Any appropriate changes or enhancements to the frequency or capacity of publicly funded bus services would be subject to consultation with the Highway Authority through the planning process.
- 2.25 Regarding criterion viii, the review of potential site allocations prepared by Hankinson Duckett Associates (Appendix 3) sets out a series of mitigation to minimise impacts of the proposals on the AONB and integrate the scheme into the landscape. The proposals would be brought forward in line with a comprehensive green and blue infrastructure strategy and full details of the rationale behind the proposals, including design approach, will be set out in the Design and Access Statement and Landscape Strategy to be submitted with the application.
- 2.26 Regarding criterion ix, although the proposed roundabout would result in some loss of the grassland habitat that forms part of the Blandford Bypass Site of Importance for

Nature Conservation (SINC), the grassland is of relatively recent origin and opportunities for its replacement can be provided as part of the landscape scheme.

- 2.27 Where other habitats of some ecological value are present such as hedgerows and treelines these can generally be retained as part of the green infrastructure. Where loss is unavoidable, for example for site access, then provision for replacement planting can be made to maintain the current site habitat resource and connectivity across the site and the wider landscape. Furthermore, the landscape scheme for the proposed development could provide opportunities for the creation of new habitats of wildlife value including species-rich grassland, native shrub and tree planting. In addition, new wetland habitats such as ponds, swales and reedbeds could be created either as standalone features or as part of the surface water drainage scheme.
- 2.28 Subject to implementation of the usual measures to comply with nature conservation legislation and to maintain opportunities for protected species at the site following development, the proposed development would not be expected to result in adverse effects. Development could in fact provide new opportunities to enhance the value of the site for these groups through habitat creation and enhancement works described above in addition to the provision of new features such as bat and bird boxes.
- 2.29 With further reference to criterion ix, the proposals would deliver a range of public open space for the use of both existing and future residents as demonstrated by the Draft Illustrative Framework Masterplan and Green Infrastructure Masterplan. The proposed area of public open space can link into the existing green infrastructure network of Blandford through both existing and proposed links. Open space provision would include a mix of natural / semi natural open space, allotments, formal playing space, informal playing space, outdoor sport and the primary school sports fields.
- 2.30 Criterion x requires a flood risk assessment and sustainable drainage strategy. These are standard requirements that will be provided as part of the application. Storm water runoff generated by the future development will be intercepted by a new drainage network. The drainage network will be appropriately sized to safely manage flows on-site and will include allowances for the predicted effects of climate change (up to 40% increase in rainfall intensity).
- 2.31 Where possible, clean runoff will be returned to ground through the use of soakaways, with any residual runoff being stored on-site within lined attenuation pond(s). The lined pond(s) will promote water quality enhancement and will utilise flow controls to restrict the off-site flow to greenfield rates or below. This approach will ensure that the peak rates of discharge from the existing greenfield site are not being increased, furthermore

the strategy will safeguard against the predicted effects of climate change. The restricted discharge will be directed towards the naturally receiving watercourse, namely The Pimperne Brook.

- 2.32 Whilst Policy B2 sets out that the proposals should be made in the form of a comprehensive outline planning application, it is considered that a hybrid application (part full, part outline) should be considered. Such an application would allow for part of the proposals to come forward in detail, which provides certainty over what will be delivered on the site as well as enable quicker delivery.
- 2.33 Any planning application for the site would include all of the information contained in criterion xi to xiii of Policy B2. However, we would like to seek clarification regarding the provision of the school at the site. Throughout the Neighbourhood Plan there are a few inconsistences with regards to the provision of the size of the school, with some **references to 'at least a 2FE school' and other references requiring a 2FE school with** space to expand to 3FE. We would therefore be grateful for clarity on the school provision required by the Neighbourhood Plan.
- 2.34 In summary, the site offers a unique opportunity to continue the historic growth of Blandford whilst providing a gateway and an integrated approach to housing, economic uses and community facilities and services. The allocation will provide much needed homes and facilities in Blandford whilst supporting existing local facilities and services in the town centre.
- 2.35 As set out in the supporting text of Policy B2, in addition to the delivery of housing, the allocation will deliver other vital land uses and infrastructure to help meet the needs of Blandford. The Land North and East of Blandford Forum will help meet North **Dorset's** housing need whilst providing a school as required by Policies 14 and 16 of the currently adopted Local Plan and other significant benefits to the local community.
- 2.36 It is considered that the allocation of the Land North and East of Blandford Forum is proportionate to the existing development within the town and is in a sustainable location to enable the settlement's services and facilities to be supported throughout the Neighbourhood plan period and beyond.

Policy B3 – Employment

2.37 Criterion c) of Policy B3 sets out a proposed extension to Sunrise Business Park for B1-B8 uses; however, the emerging Dorset County Council Waste Plan allocates the site for

a waste site. The Plan has been through the Modifications stage and is currently with the Inspector, with his report expected by Christmas or early in the New Year. We therefore suggest that the Neighbourhood Plan reviews its Figure 3 against that of the emerging Dorset County Council Waste Plan to ensure consistency in respect of the red line for the allocated waste site. If, however, all of the land is not required for the waste facility then it could deliver additional employment opportunities for local people as set out in paragraph 5.29. Notwithstanding this, a new waste site would provide some employment and therefore could help to satisfy the employment desire of the Neighbourhood Plan. As mentioned in paragraph 5.30, we also concur with the **Neighbourhood Plan's recognition that if the Waste proposal does not come to fruition,** then all the land being used for employment purposes is supported. We also welcome the whole of Site C on Inset Map B being identified as part of the wider Policy B employment allocation.

2.38 We acknowledge that the Neighbourhood Plan is looking to promote healthier lifestyles by ensuring that new development provides affordable homes in sustainable locations with good access to employment via means of walking, cycling or public transport. We are supportive of this approach and the allocation on Land North and East of Blandford Forum can achieve the desired objectives through the creation of a genuinely mixed-use community.

Policy B4 - Secondary Education

- 2.39 We support the expansion of the secondary school in Blandford, however, we would like to highlight that the extension should be based on future population projections to ensure the correct level of growth is provided for.
- 2.40 In addition to the growth arising from the future population projections, the expansion of the Blandford School will need to consider the new population which will arise through new development in Blandford over the plan period, including the allocation on Land North and East of Blandford Forum. The expansion of the school should be based on evidence, including that within Dorset County **Council's Blandford Pupil Place Planning** Statement.

Policy B5 – Community Facilities

2.41 We support the retention of the community facilities set out in the Neighbourhood Plan. In addition to the retention of existing facilities, opportunities to enhance existing or create new community facilities should be taken to support healthy lifestyles. Any new facilities should reflect the needs of the community identified by the Neighbourhood Plan, the North Dorset Local Plan or any relevant evidence.

- 2.42 The allocation to the Land North and East of Blandford Forum will contribute to **Blandford's** community facilities through the relocation of the allotments and the provision of a new community hub in a sustainable location.
- 2.43 Paragraph 92 of the NPPF (2018) highlights that local policies should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. The Neighbourhood Plan and emerging proposals on Land North and East of Blandford Forum take an integrated approach, in accordance with the requirements of the NPPF.

Policy B7 - Health Provision

- 2.44 Policy B7 sets out that all new residential development proposals will only be permitted where they provide or improve the delivery of essential health and/or wellbeing facilities and services required to serve the scale of development proposed. This approach is accepted and deemed sensible. However, as noted earlier, the need for a new health facility will need to be justified by appropriate evidence.
- 2.45 We note that a Health Background note will be submitted with the Submission Neighbourhood Plan. We would like to reserve the right to comment further following the publication of this note and evidence therein.

Policy B8 – Blandford Forum Town Centre

- 2.46 We support the Neighbourhood Plan's ambition to support new proposals that will contribute to the vibrancy and vitality of Blandford's Town Centre. It is clear that the Neighbourhood Plan is taking a positive approach to the growth, management and adaptation of Blandford's town centre in accordance with chapter 7 of the revised NPPF (2018).
- 2.47 The increased population through the provision of new homes in Blandford will help to increase footfall which will contribute to the local economy and the vitality of the facilities in the town centre. In addition, the allocation on the Land North and East of Blandford Forum provides the opportunity for connections between land north and south of the A350/A354, which will further assist in supporting the town centre.

Policy B9 – Green Infrastructure Network

- 2.48 The maintenance and enhancement of the Green Infrastructure Network in Blandford is supported. We would like to highlight that the allocated site on Land North and East of Blandford Forum would improve pedestrian and cyclist connectivity by providing links to the local green infrastructure network and accessibility to open space for current and future residents.
- 2.49 A new link from the site across the A354 to Preetz Way to provide a link to the rugby club would be created, and in addition to this there would be a further link along the A354 to Black Lane which is also identified as part of the Green Infrastructure Network. The reuse of the existing footbridge over the A350 would provide a link into the north east of the town and enable residents to access the employment and retail opportunities in this area of the town, alongside the relocated allotments and primary school. The construction of this scheme would add to and improve the network of green infrastructure paths around the town and would not cause a detriment or reduction in the network.

Policy B10 - Local Green Spaces

2.50 The Neighbourhood Plan designates several local green spaces within Blandford. In addition to these existing green spaces, as noted earlier the allocation at land to the North and the East of Blandford can provide a range of public open space for the use of both existing and future residents, as well as linking the existing with the proposed infrastructure network in Blandford.

Basic conditions

- 2.51 To enable the Neighbourhood Plan to progress to referendum it will be necessary to satisfy the 'basic conditions'.
- 2.52 While broadly speaking it is considered that the Neighbourhood Plan meets the basic conditions, we feel that prior to the Neighbourhood Plan being submitted for Examination, the points set out in these representations, including our appended Review of the Sustainability Appraisal prepared in support of the Plan, should be taken into consideration as the Plan is finalised. This will enable the Neighbourhood Plan to be robustly defended at Examination and have the greatest chance of proceeding to referendum.

3.0 Conclusions

- 3.1 We consider that the Blandford + Neighbourhood Plan 2 has been well prepared and will **meet Blandford's housing need. The Neighbourhood Plan has** allocated sites in sustainable locations which have good access to employment, local services and facilities.
- 3.2 The Land North and East of Blandford Forum, allocated by Policy B2, is considered to be in a sustainable, accessible location. It is clear that the site will provide significant community benefits including the provision of a new primary school, relocated allotments, a community hub, affordable homes and an area of public open space. The site will also contribute to Blandford's green infrastructure network and the future residents will contribute to the local economy and the vitality of the town centre.
- 3.3 Whilst we understand the allocation of the section of the site within Pimperne Parish is out of the Blandford + Neighbourhood Plan's control, we would like to highlight that this land is available, deliverable and developable and would not result in a detrimental impact on the gap between Pimperne and Blandford.
- 3.4 Overall, it is considered that the Neighbourhood Plan meets the basic conditions required of a Neighbourhood Plan. However, prior to the Neighbourhood Plan being submitted for Examination, it would be beneficial to consider the points raised in these representations, to enable the Neighbourhood Plan to be robustly defended at Examination and have the greatest chance of proceeding to referendum.
- 3.5 We trust that the representations provided are helpful. If the Neighbourhood Plan Steering Group would consider it beneficial to discuss the representations provided further, then please do not hesitate to contact us.

APPENDIX 1

DRAFT ILLUSTRATIVE FRAMEWORK MASTERPLAN AND GREEN INFRASTRUCTURE MASTERPLAN



LANGTON LONG BLANDFORD

*Mixed-Use Local Centre, potentially including residential, retirement living, shops, café and community facilities scale 1:2500 50m 100m North East Blandford Wyatt Homes

Illustrative Framework Masterplan Drwg. no: 131_DI_25.6

2018-12-19 1:2500 @ A1 DA ref:28.5_1_2500 Framework Masterplan

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CT ACTUCATION N

NEW masterplanning



CLIENT: Wyatt Homes PROJECT: Blandford Forum TITLE: NP Green Infrastructure Masterplan SCALE AT A3: DATE: See scale bar December 2018

813.21/105

Based on Ordnance Survey mapping with permission of Her Majesty's Stationery Office Licence no. AR187372 © hankinson duckett associates

hda

Landscape Architecture Masterplanning Ecology

APPENDIX 2

REVIEW OF BLANDFORD + SUSTAINABILITY APPRAISAL

Review of the Sustainability Appraisal undertaken to inform the emerging Blandford + Neighbourhood Plan 2 Pre-submission Consultation

On Behalf of Wyatt Homes (Lewis Wyatt Construction Ltd) and landowners (The West Pimperne Pool Trust, Mr C Coats and Mr T Coats)

December 2018



Review of the Sustainability Appraisal undertaken to inform the emerging Blandford + Neighbourhood Plan 2 Pre-submission Consultation

On Behalf of Wyatt Homes (Lewis Wyatt Construction Ltd) and landowners (The West Pimperne Pool Trust, Mr C Coats and Mr T Coats)

Project Ref:	28458/A3/LV/LW	28458/A3/LV/LW	
Status:	Draft	Final	
Issue/Rev:	P1	P1	
Date:	07/12/2018	19/12/2018	
Prepared by:	LV/LW	LV/LW	
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APPENDICES

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Appendix 2:	SA Site Specific Review: Land North & East of Blandford Forum

1.0 INTRODUCTION

- 1.1 This report has been prepared on behalf of Wyatt Homes (Lewis Wyatt Construction Ltd) and landowners (The West Pimperne Pool Trust, Mr C Coats and Mr T Coats). The report sets out the findings of our review of the Sustainability Appraisal (SA) of the Blandford + Neighbourhood Plan 2 (B+NP2), published alongside the Pre-Submission version of the B+NP2 under Regulation 14 of The Neighbourhood Planning (General) Regulations 2012 (as amended).
- 1.2 Where a Neighbourhood Plan is likely to have significant environmental effects, it must be subject to a strategic environmental assessment (SEA) in accordance with The Environmental Assessment of Plans and Programmes Regulations 2004 (the "SEA Regulations"). North Dorset District Council (NDDC) has confirmed that SEA is required for the B+NP2. While there is no legal requirement for a NP to be subject to SA under the Planning and Compulsory Purchase Act 2004, it is necessary to demonstrate how the NP will contribute to achieving sustainable development and National Planning Practice Guidance (NPPG) states that a SA may be a useful approach for doing this¹. SEA and SA can be combined into a single appraisal process that meets the requirements of the SEA Regulations, including social and economic alongside environmental issues.
- 1.3 A review has been undertaken against the requirements of the SEA Regulations, section 19 of the Planning & Compulsory Purchase Act 2004 and NPPG. It is not a formal legal review but considers whether the SA complies with the regulatory requirements.
- 1.4 In addition, a site specific review has been undertaken of how Option 1 (Land North & East of Blandford Forum) has been considered within the SA process.
- 1.5 The review has focused on the November 2018 SA Report, but also makes reference to the June 2018 SA Scoping Report, where relevant, as well as the Landscape Review of Potential Site Allocations (December 2018), prepared by Hankinson Duckett Associates (HDA).
- 1.6 Chapters 2 and 3 of this report summarise the review findings, which are set out in full in Appendices 1 and 2. Chapter 4 sets out the main conclusion of the review.

¹ Paragraph: 026 (Reference ID: 11-026-20140306) of the section on *Strategic environmental assessment and sustainability appraisal* (revision date 06 03 2014)

2.0 REGULATORY REVIEW

- 2.1 A review of the SA against the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 and Section 19 of the Planning & Compulsory Purchase Act 2004 is included at Appendix 1.
- 2.2 The SA process to date meets the regulatory requirements. The text within the SA Report (November 2018) makes helpful links between the difference policies of the Neighbourhood Plan that will work together and recommends how the policies could be improved for better sustainability outcomes. It is recommended that the final iteration of the SA Report provides more clarity on the following issues.

The methodology for assessing cumulative effects and whether all effects have been identified

2.3 Cumulative effects have scant mention in the SA Scoping Report and SA Report. Both documents acknowledge the possibility of such effects (paragraph 5.49 of the Scoping Report and page 50 of the SA Report) but only one effect (light pollution) is discussed (Table 4.1 of the SA Report considering Options 3 and 4). It would be helpful for the final SA Report to explain how cumulative effects have been assessed. It is likely that this has been qualitative based on professional judgment, but this should be stated, along with any assumptions or limitations of the assessment. If no other cumulative effects are anticipated this should also be made clear.

Mitigation measures

- 2.4 The SA Report discusses inherent mitigation measures within the policies of the current Neighbourhood Plan throughout the text and makes recommendations for policies to be updated to include additional mitigation measures. Paragraph 5.31 acknowledges the uncertainty around mitigation not being delivered through the allocation for mixed use development, which is clarified at paragraph 5.61, which provides recommendations for improving the policies. This includes Policy B2 (to include design principles and other mitigation), B9 to include commitment to biodiversity net gain and for a dedicated AONB policy to be added.
- 2.5 It would be helpful for the measures to be summarised in a table to separate out what is already in the Neighbourhood Plan and what should be added, for clarity and to make it easier for the next iteration of the Neighbourhood Plan to address the recommendations. This would also substantiate the ranking of Options.

3.0 SITE SPECIFIC REVIEW

- 3.1 Our full site specific review of the SA is provided at Appendix 2 of the report.
- 3.2 Overall, our review has found that the SA is largely skewed towards negative outcomes. It has identified that opportunities for positive impacts have been largely overlooked, with the assessment largely focusing on potential adverse impacts, notwithstanding opportunities for mitigation. This is illustrated through 25 of the 32 rankings across all four Options being attributed a score of 3 or 4, which represent the least favourable outcomes². This approach gives the impression that each Option is likely to lead to more harm than benefits.
- 3.3 It is understood that SA is, necessarily, a high-level assessment, relying on baseline information largely within the public domain to inform its conclusions. This is likely to be a reason for the scoring of all Options to appear more negative than positive as the appraisal is constraints focused rather than opportunity focused. Physical and defined constraints such as the location of designated areas, settlements and transport networks have had more influence in the analysis than consideration of potential benefits. This is not considered to be a flaw of the SA, but the negative skew should be borne in mind in the Examination of the Neighbourhood Plan.
- 3.4 With reference to our client's land (Option 1: Land North & East of Blandford Forum), we are fully in agreement with the conclusion of the SA (paragraph 4.26) that Option 1 is the most sustainable location in the town to deliver the 'land use specification' agreed between the District and Parish Councils. However, for some of the assessment themes we believe that the potential impacts in relation to Option 1 are worthy of amendment to ensure that the SA can be robustly defended during the Examination of the Neighbourhood Plan.
- 3.5 As the SA may not reflect the latest position or use the most up to date information regarding **our client's land**, in the interest of being helpful, we have provided further details in response to each theme **in Appendix 2 (see 'Response** to Option 1 ranking' **column)** to assist with the finalisation of the SA and to ensure a consistent assessment. If these points are taken into consideration Option 1 would score more favourably in many respects **(see 'Suggested** revisions to Option 1 ranking' **column)**.

 $^{^2\,}$ '1' is the most favourable outcome and '4' is the least favourable

3.6 This section provides a summary of our responses to the **scoring of our client's land under** each of the themes included in the SA, including our suggested recommendations. It does not repeat our detailed responses in Appendix 2, which should be read alongside this summary. It also does not comment on the ranking applied to the other Options, as others are better placed to advise in relation to the these.

Biodiversity and geodiversity

- 3.7 Option 1 would result in the delivery of a range of biodiversity and geodiversity benefits. It is not clear why development at Option 1 performs so poorly in respect of this theme.
- 3.8 Overall, Option 1 provides opportunities to significantly improve 'biodiversity and geodiversity' in the local area and have a positive impact on this theme.

Recommendation: Ranking of Option 1 concerning this theme to change from a '3' to a '2'.

Climate change

- 3.9 Option 1 would result in the delivery of a range of benefits that would positively influence climate change. It is not clear why development at Option 1 performs so poorly in respect of this theme.
- 3.10 It is also not clear why Option 1 has scored less favourably than the other Options. Option 1 would have at least a comparable impact on 'climate change' to the other Options.
- 3.11 Overall, Option 1 provides opportunities to significantly improve 'climate change' in the local area and have a positive impact on this theme.

Recommendation: Ranking of Option 1 concerning this theme to change from a '4' to a '2'.

Landscape and historic environment

3.12 Of all the Options considered, Option 1 would result in the least degree of harm to the landscape and historic environment. This is confirmed by the appended report ('Review of Potential Site Allocations') prepared by Hankinson Duckett Associates.

3.13 Overall, Option 1 provides opportunities to provide a range of benefits for the town, despite the potential for some adverse impacts on the 'landscape and historic environment' and a negative impact on this theme. The ranking attributed to Option 1 is therefore considered to be fair.

Recommendation: Ranking of Option 1 concerning this theme to remain a '1'.

Land, soil and water resources

- 3.14 Of all the Options considered, it is not clear why Option 1 has scored the least favourable and is considered to result in the most harm to land, soil and water resources.
- 3.15 Option 1 would have at least a comparable impact on 'land, soil and water resources' as the other Options, which amounts to a slightly negative impact upon this theme.

Recommendation: Ranking of Option 1 concerning this theme to change from a '4' to a '3'.

Population and community

- 3.16 Option 1 would result in the delivery of a range of benefits that would positively influence the local population and community.
- 3.17 Overall, Option 1 provides opportunities to significantly improve 'population and community' in the local area and have a positive impact on this theme. The ranking attributed to Option 1 is therefore considered to be fair.

Recommendation: Ranking of Option 1 concerning this theme to remain a '1'.

Health and wellbeing

- 3.18 Option 1 would result in the delivery of a range of benefits that would positively influence health and wellbeing.
- 3.19 Overall, Option 1 provides opportunities to significantly improve 'health and wellbeing' in the local area and have a positive impact on this theme. The ranking attributed to Option 1 is therefore considered to be fair.

Recommendation: Ranking of Option 1 concerning this theme to remain a '1'.

Economy and enterprise

- 3.20 It is not clear why Option 1 has scored less favourably than Options 3 and 4. Option 1 would have at least a comparable impact on 'economy and enterprise' to the other Options.
- 3.21 It appears that the sole reason for Option 1 scoring less favourably relates to it being on the other side of the A350 from the Blandford Heights Industrial Estate, whereas Options 3 and 4 are in closer proximity to the Estate.
- 3.22 Overall, Option 1 provides opportunities to significantly improve 'economy and enterprise' in the local area and have a positive impact on this theme.

Recommendation: Ranking of Option 1 concerning this theme to change from a '4' to a '2'.

Transportation

- 3.23 It is not clear why Option 1 has scored so unfavourably, given that positive impacts on 'transportation' can be achieved, not least through reduced reliance on the private car and opportunities for sustainable modes of travel.
- 3.24 Overall, Option 1 provides opportunities to significantly improve 'transportation' in the local area and have a positive impact on this theme, despite the likelihood of introducing additional vehicles into the town.

Recommendation: Ranking of Option 1 concerning this theme to change from a '4' to a '2'.

4.0 CONCLUSION

- 4.1 This report has appraised the site against the regulatory requirements of the SEA Regulations and section 19 of the Planning & Compulsory Purchase Act 2004 along with the NPPG. It is not a formal legal review but considers whether or not the SA complies with the regulatory requirements.
- 4.2 In addition, the report has appraised the approach to the consideration of Option 1 (Land North & East of Blandford Forum) and the judgements made in relation to the Option.
- 4.3 In summary, the SA process to date meets the regulatory requirements. However, it is recommended that the final iteration of the SA Report provides more clarity in relation to:
 - The methodology for assessing cumulative effects and whether all effects have been identified.
 - Mitigation measures.
- 4.4 Our site specific analysis has identified that, while Option 1 has been identified as the most **sustainable location in the town to deliver the 'land use specification', it** performs more favourably than the SA has so far concluded. Opportunities for positive impacts have been largely overlooked, with the assessment largely focusing on potential adverse impacts, notwithstanding opportunities for mitigation. This has resulted in the site being considered less favourably than it should otherwise have been.
- 4.5 Option 1 should score comparable to, and in some respects better than, the other Options for the reasons provided. We therefore suggest that the SA is reviewed in light of the information that we have provided. This will ensure that it can be robustly defended during the Examination of the Neighbourhood Plan.

APPENDIX 1

SA REGULATORY REVIEW

Review of the Sustainability Appraisal of the Blandford+ Neighbourhood Plan 2	(November 20	018) Appendix 1: Regulatory Compliance
	Compliance	Notes/Recommendations
This is not a legal review. The SA process has been reviewed against the SEA Regulations and requirements of the Planning & Compulsory Purchase Act 2004 on SA. The SA Scoping Report (June 2018) and SA Report	Кеу	
(November 2018) have been reviewed.		Meets requirements
		Improvements suggested
		Risk of challenge. Does not meet requirements
SEA Regulations, Regulation 12 and Schedule 2 - Contents of Environmental Report	_	
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.		This is set out within Chapter 1 of the Sustainability Appraisal for (June 2018) (Scoping Report) and further developed within Chap Blandford + Neighbourhood Plan 2 to accompany Regulation 14 rationale for the evolution of the approach is described in Chapt other plans is discussed in Chapter 2 and Appendix A where the The SA Non-Technical Summary gives a helpful introduction exp of planning policy, with the North Dorset Local Plan.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.		The Scoping Report and the SA Report clearly sets out the curre to 10) on each topic area provided in the Scoping Report which Chapter 3 and Appendix A of the SA Report. The granularity of c information covers all relevant topics.
3. The environmental characteristics of areas likely to be significantly affected		This is set out in the same locations as 2 above. The Scoping Re
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.		- characteristics of the area, with separate chapters on each topic sustainability issues are then summarised in Chapter 3 and Appe consideration was given to the potential impact of atmospheric r Special Area of Conservation (SAC) and the potential impacts an Downs Area of Outstanding Natural Beauty (AONB) and Blandfo
5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.		The Scoping Report sets out the key environmental sensitivities to the area encompassed by the Neighbourhood Plan. This has i assessment questions in Table 3.2 and the SA Framework discussions in Table 3.2 and the SA Framework discussion.
 6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as— (a) biodiversity; (b) population; 		The sustainability objectives cover all the environmental issues I stated as a standalone environmental issue) and most are specif is no explicit reference or discussion in the SA Report to synergis issues which would occur from each spatial option.
 (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; 		There is no methodology set out for the consideration of cumula just said that it was a qualitative assessment drawing on profess Cumulative effects are identified for Options 3 and 4 with respec Report) but not mentioned elsewhere. If there are no other cum 50 of the SA report (and para 5.49 of the SA Scoping Report) ac landscape/townscape character and quality but apart from the p mentioned.
 (I) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (I). 		
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.		Chapter 5 of the SA Report discusses mitigation for the individual effects, including in relation to landscape and townscape charac protection and enhancement of the environment. When consider Chapter 4 also identifies where community infrastructure is need

for the Blandford+ Neighbourhood Plan 2 Scoping Report hapters 1 to 3 of the Sustainability Appraisal for the 4 Consultation (November 2018) (SA Report). The pter 4 within the SA Report while the relationship with he Local Plan context is discussed.

xplaining where the Neighbourhood Plan fits in the tiers

rent state of the environment, with separate chapters (2 th is then cross referred to and summarised within f data is considered appropriate for an SA and the

Report includes clear sections on the environmental bic area (Chapters 2 to 10). The key environmental and opendix A of the SA Report. In addition specific c nitrogen deposition on the Fontmell and Melbury Downs and effects on the Cranbourne Chase and West Wiltshire ford Forum and the Dorset AONB.

es and key environmental protection objectives in relation s informed the SA Report and in particular the cussed in Chapter 3.

s listed (apart from material assets which is not explicitly ecifically dealt with in Chapter 5 of the SA Report. There gistic/interactive effects or inter-relationship between

ulative effects, which would have been helpful, even if it essional judgment.

bect to light pollution (Table 4.1 on page 36 of the SA umulative effects anticipated this should be stated. Page acknowledges that there would be cumulative changes in the point about light pollution, cumulative effects are not

lual topics where it would be required to avoid significant acter, the quality of life of residents, tourism and the dering specific policies, which allocate development, eeded.

8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapter 4 of the SA Report discusses the spatial options assessed were chosen. The Neighbourhood Plan was prepared in conjunct North Dorset and the emerging Local Plan Review during which the of land availability. In addition in considering potential future de undertaken a 360 degree search around the existing settlement Neighbourhood Plan is programmed to come forward more quick the Local Plan's reasoning and evidence, along with that of the a about the difficulties or limitations/deficiencies of this work.
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.	The Scoping Report refers in Chapter 11 to the need to publish a to "tell the story of plan-making/SA" and present "measures dec presented in the SA Report as the plan was only published for conductional information would be required in the final version of the story of the sto
10. A non-technical summary of the information provided under paragraphs 1 to 9	The non-technical summary is clear, concise and appropriate for

Planning & Compulsory Purchase Act 2004 - Section 19 Requirements for SA	
Stages from Planning Practice Guidance Paragraph: 013 Reference ID: 11-013-20140306.	
PPG paragraph references provided below, where relevant.	
A Setting the context and objectives, establishing the baseline and deciding on the scope	
Identifying relevant policies, plans and programmes	This is established at the outset of the Scoping Report and is cle Report.
Collecting baseline information	The baseline information is presented in detail within the Scopin Appendix A of the SA Report.
Identifying environmental and sustainability issues	The Scoping Report includes clear sections on the environmenta each topic area (Chapters 2 to 10). The key environmental and s and Appendix A of the SA Report.
Identifying appraisal objectives	The Scoping Report sets out the key environmental sensitivities to the area encompassed by the Neighbourhood Plan. This has in questions in Table 3.2 and the SA Framework discussed in Chap
Consulting on the scope of the appraisal	Statutory consultees were invited to comment on the content of SA, the identified key issues and the proposed SA Framework. O Scoping Report are summarised in Table 3.1 in the SA Report. F determining the alternatives to be investigated has been carried Neighbourhood Plan process as explained in Chapter 4 of the SA
B Developing and refining options and assessing effects	
Testing the Plan objectives against appraisal objectives	The Plan policies are tested comprehensively against the SA objective
Developing and refining the alternative options for the plan Paragraph: 018 Reference ID: 11-018-20140306	Chapter 4 of the SA Report discusses the spatial options assessed were chosen. The Neighbourhood Plan was prepared in conjunc North Dorset and emerging Local Plan Review during which ther land availability. In addition in considering potential future deve undertaken a 360 degree search around the existing settlement Neighbourhood Plan is programmed to come forward more quick the Local Plan's reasoning and evidence, along with that of the a
Predicting and evaluating the significant effects of the options and alternatives	The appraisal findings associated with predicting and evaluating are discussed in detail in Chapter 4 of the SA Report.

assed and the background behind why the alternatives anction with the provisions of the current Local Plan for the there was a new "Call for Sites" to update the evidence development options at Blandford, the Council has nt boundary that was defined for the town. Although the nickly that the Local Plan Review, it will be informed by e adopted Local Plan. There were no other discussions

n a "statement" at the time of the plan adoption in order ecided concerning monitoring". The information is not consultation not adoption. An amber score is given as f the SA report.

or a non-technical audience.

clearly set out within Chapter 2 and Appendix A of the SA

ing Report (Chapters 2 to 10) and within Chapter 3 and

tal characteristics of the area, with separate chapters on d sustainability issues are then summarised in Chapter 3

is and key environmental protection objectives in relation is informed SA Report and in particularly the assessment apter 3.

of the Scoping Report, particularly the evidence for the Consultation responses received in relation to the Further relevant consultation associated with ed out within the Local Plan Review process and the SA Report.

bjectives.

sed and the background behind why the alternatives nction with the provisions of the current Local Plan for ere was a new "Call for Sites" to update the evidence of velopment options at Blandford, the Council has nt boundary that was defined for the town. Although the ickly that the Local Plan Review, it will be informed by e adopted Local Plan.

ng the significant effects of the options and alternatives

Considering ways of mitigating adverse effects and maximising beneficial impacts		The SA Report includes recommendations for improving the Plar dedicated section on mitigation measures. It would be clearer if measures were included in a list or table for ease of reference a implemented.
Proposing measures to monitor significant effects Paragraph: 025 Reference ID: 11-025-20140306		The Scoping Report refers in Chapter 11 to the need to publish a to "tell the story of plan-making/SA" and present "measures decorresented in the SA Report as the plan was only published for confurther information would be required in the final version of the
C Preparing the Sustainability Report - Including the SEA Requirements		See comments above. The SA Report is clear and comprehensive process or content but there are several areas that would warrant
D. Seek representations on the SA report from consultation bodies and the public Paragraph: 020 Reference ID: 11-020-20140306		The Scoping Report is clear and concise and poses questions for SA.
E. Post adoption reporting and monitoring Paragraph: 025 Reference ID: 11-025-20140306	N/A	To be considered after adoption of the Plan.

lan's performance in the body of text. There is no if a list of recommended mitigation and enhancement and to increase the likelihood of them being

th a "statement" at the time of the plan adoption in order decided concerning monitoring". The information is not r consultation not adoption. An amber score is given as the SA Report.

sive. No major deficiencies have been identified in rant greater detail and/or explanation.

for consultees to shape the methodology and focus of the

APPENDIX 2

SA SITE SPECIFIC REVIEW: LAND NORTH & EAST OF BLANDFORD FORUM

Review of the Sustainability Appraisal of the Blandford + Neighbourhood Plan 2 (November 2018) Appendix 2: Site Specific Review

Ranking: '1' is most favourable and '4' is least favourable The four Spatial Options were appraised as 'reasonable alternatives' against both the baseline and relatively (i.e. against each other) (paragraph 4.23). Options were ranked numerically based on their relative sustainability performance (Paragraph 4.24) taking account of the SA Framework (Table 3.2).	Option 1: Focus growth to the north of Blandford Forum in Area A and B to deliver the full specification	Option 2: Focus growth to the south west of Blandford St Mary in Areas F1 and F2 to deliver the full specification	Option 3 Dispersed approach: Accommodating 300 homes and a primary school in Area F1 to the south west of Blandford with employment land in Area J	Option 4 Dispersed approach: Accommodating 300 homes and a primary school in Area F2 to the south west of Blandford with employment land in Area J	Response to Option 1 ranking	Suggested revisions to Option 1 ranking
1 2 3 4				·		
Site Appraisal Review						
Biodiversity and geodiversity	3	3	4	3	Development at Option 1 would be brought forward in line with a comprehensive green and blue infrastructure strategy. This would provide opportunities to conserve and enhance biodiversity, including the retention of trees, hedgerows and other biodiversity features where possible, alongside replacement and additional planting alongside habitat creation. Overall, development would contribute positively to the biodiversity opportunities within and adjoining the site, and enable a net biodiversity gain, whilst minimising the potential for adverse impacts. This would be achieved through a well considered design and layout, informed by a qualified ecologist. The Sustainability Appraisal explains that the site is located outside of the SSSI Impact Risk Zones for residential development, but has the potential to affect the Blandford Camp SSSI through impacts such as air pollution, being approximately 2.2km away from the site. It is not clear why it is considered that development at Option 1 has the potential to affect Blandford Camp SSSI in this regard. An Environmental Impact Assessment (EIA) Scoping Report was submitted to North Dorset District Council (NDDC) on 1 October 2018 in connection with the emerging proposals including land at Option 1 and a Scoping Opinion was issued by NDDC on 9 November 2018 (ref. 2/2018/1386/SCOEIA). Notwithstanding the fact that the Blandford Camp SSSI is located approximately 1.4km to the east of Option 1 as opposed to the 2.2km referred to in the Sustainability Appraisal, the only air quality comments received on the EIA Scoping Report related to potential impacts of the proposed development on the much closer Cranborne Chase AONB and surrounding areas of the AONB, for which appropriate mitigation can be secured as part of the planning process. While Natural England commented on potential air quality impacts appear to have only been attributed to Option 1 when Natural England's comments relate to 'proposals' in general. Option 1 would have at least a comparable impact on air quality t	2
Climate change	4	3	3	3	Development at Option 1 would be within walking distance of local shops and services in Blandford town centre, local bus stops and the facilities proposed as part of the allocation. This includes a new primary school, community hub (with convenience store and potential general practice facility), employment and allotments. The pedestrian bridge would also provide pedestrian access between the existing built up area to the south of the A350 and new development at Option 1 to the north, including the facilities in each location, and so the A350/A354 should not be seen as a barrier. Development at Option 1 would encourage sustainable travel and decreased reliance on private car usage, resulting in reduced greenhouse gas emissions. This would be supplemented by the comprehensive green and blue infrastructure strategy explained above. While part of Option 1 is located in Flood Zone 2/3 (along its south eastern boundary) this land would not be used for built development. All development would be located in Flood Zone 1 whilst land within Flood Zones 2/3 would comprise new accessible open space to be provided as part of the development. With regard to managing surface water, infiltration drainage will be prioritised and any residual runoff will be treated and attenuated on-site, with controlled discharge to the Pimperne Stream, as confirmed in the EIA Scoping Report. For these reasons it is not clear why Option 1 has scored less favourably than the other Options. Option 1 would have at least a comparable impact on 'climate change' to the other Options. Overall, Option 1 provides opportunities to significantly improve 'climate change' in the local area and have a positive impact on this theme.	2
Landscape and historic environment	1	3	4	2	Option 1 includes land within the Cranborne Chase AONB (search area A), although only partly as opposed to wholly as referred to in the SA given that the existing allotments fall outside the AONB boundary, as well as land within the setting of the AONB (search area B plus the existing allotments in search area A). Development at Option 1 is therefore likely to cause some degree of harm to the special qualities of the AONB and its setting. Land under all Options (Options 1-4) is at least partially within an AONB, with only search areas F2 and B being located outside, although adjacent to the AONB. Meanwhile, as noted in the Sustainability Appraisal, Option 1 (alongside Option 4) is likely to have a more limited adverse effect than Options 2 and 3 on the historic environment as they are located further from the historic core of Blandford Forum. Option 1 is also much further away from Blandford St Mary than the other options and would therefore have a far lower (if any) impact on its identity and historic setting. A Landscape Review of Potential Site Allocations has been undertaken by Hankinson Duckett Associates (dated December 2018) and is appended to our representations. With regard to search area A (Option 1), it explains that the land outside the AONB could be developed for housing, the land adjacent to the pedestrian bridge could provide a suitable location for a 'low-rise' school and associated open space, and the land west of the school site could provide replacement allotments on a level arable field. With regard to search area A via the Salisbury junction, provide pedestrian access to Black Lane and a new junction onto the A354, and that additional capacity is available to the north of the option area without affecting the setting to the neighbouring Pimperne parish. It goes on to note that "Option 1 (sites A and B) provides the 'best fit' to the Plan's aspiration for a new school north of the town and a strategic housing site" and sets out a series of mitigation to limit harm on the AONB. Overall, Optio	1
Land, soil and water resources	4	3	3	3	While development at Option 1 would result in a minor negative impact on agricultural land in the town, this does not represent a significant constraint to development. In addition, it is noted that much of the land around Blandford - including Options 2-4 - is Best and Most Versatile, with poorer quality land unavailable for development. While part of Option 1 falls within Groundwater Source Protection Zone 1, this is not a constraint to development and appropriate mitigation can be secured as part of the planning process. For these reasons it is not clear why Option 1 has scored less favourably than the other Options. Option 1 would have at least a comparable impact on 'land, soil and water resources' as the other Options, which amounts to a slightly negative impact upon this theme.	a a a a 3
Population and community	1	4	4	4	Development at Option 1 would provide a positive contribution to the existing Blandford community by providing a mix of uses within a well designed, safe and accessible development in close proximity to existing residents and facilities. While the A350/A354 is regarded as a barrier between Option 1 and the rest of the town, as explained earlier, the pedestrian bridge provides pedestrian access, whilst development at Option 1 would provide a range of facilities that would cater for residents in a part of the town where community facilities are most needed. This would encourage sustainable journeys as noted earlier. As opposed to creating a perception of isolation at Option 1 due to the A350/A354, the delivery of additional facilities at the site would also cater to residents to the south of the A350/A354 and encourage interaction. Overall, Option 1 provides opportunities to significantly improve 'population and community' in the local area and have a positive impact on this theme.	1
Health and wellbeing	1	2	4	4	Development at Option 1 would be brought forward in line with a comprehensive green and blue infrastructure strategy. This would incorporate a range of different types of spaces including new areas of publicly accessible open space, play areas, central park, pocket parks, green corridors, etc, alongside a network of routes and links both within the site and with the wider area. The development would also be easily accessible and would, therefore, facilitate healthier lifestyles. In addition, there is the potential to provide a general practice facility at the site in the northern part of Blandford, which would be a significant benefit given that the existing two surgeries are in the south of the Neighbourhood Plan area. Furthermore, Option 1 would address the current demand for school places in the north of the town, which would be accessible by foot and bicycle, encouraging healthier trips. Overall, Option 1 provides opportunities to significantly improve 'health and wellbeing' in the local area and have a positive impact on this theme.	1

Economy and enterprise	4	4	2
Transportation	4	4	4

2	Development at Option 1 would see new employment delivered in close proximity to existing employment areas in the town, in addition to being provided alongside the delivery of new homes and facilities as part of a genuinely mixed-use development. This would encourage sustainable journeys between work and home, while the pedestrian bridge over the A350 would provide pedestrian access to residents south of the A3450 to the employment and other facilities to be delivered under Option 1. While employment at Option 1 would be located further from existing employment in the town, it would complement the existing industrial and business locations and provide long term significant positive effects through the provision of new employment land in an accessible location. While not located next to the existing Blandford Heights Industrial Estate, it would be next to and well related to the existing Sunrise Business Park. For these reasons it is not clear why Option 1 has scored less favourably than Options 3 and 4. Option 1 would at least have a comparable impact on 'economy and enterprise' to the other Options. Overall, Option 1 provides opportunities to significantly improve 'economy and enterprise' in the local area and have a positive impact on this theme.	2
4	Development at Option 1 would see the delivery of a genuinely mixed-use scheme with new employment, a primary school and facilities provided next to new housing. In addition, Option 1 is a short distance from the town centre and the facilities and services that this offers. This would encourage sustainable journeys (walking and cycling) and reduced reliance on the private car and congestion in and around the town. It would create a truly sustainable development. It would reduce the reliance of existing residents in the northern part of the town to travel (potentially via car) to access facilities and services to the south, providing them where there is the greatest pressure and they are most needed. Option 1 would also see the pedestrian bridge brought into use to provide an invaluable connection that will link Blandford to the north and south of the A350. For these reasons it is not clear why Option 1 has scored so unfavourably, given that positive impacts on 'transportation' can be achieved, not least through reduced reliance on the private car and opportunities for sustainable modes of travel. Overall, Option 1 provides opportunities to significantly improve 'transportation' in the local area and have a positive impact on this theme, despite the likelihood of introducing additional vehicles into the town.	2

APPENDIX 3

REVIEW OF POTENTIAL SITE ALLOCATIONS

Landscape Architecture Masterplanning Ecology



BLANDFORD FORUM NEIGHBOURHOOD PLAN

LANDSCAPE REVIEW OF POTENTIAL SITE ALLOCATIONS

Prepared for Lewis Wyatt (Construction) Ltd, The West Pimperne Pool Trust, Mr C Coats and Mr T Coats

by

Hankinson Duckett Associates

HDA ref: 813.21/v8/BD

December 2018

hankinson duckett associates

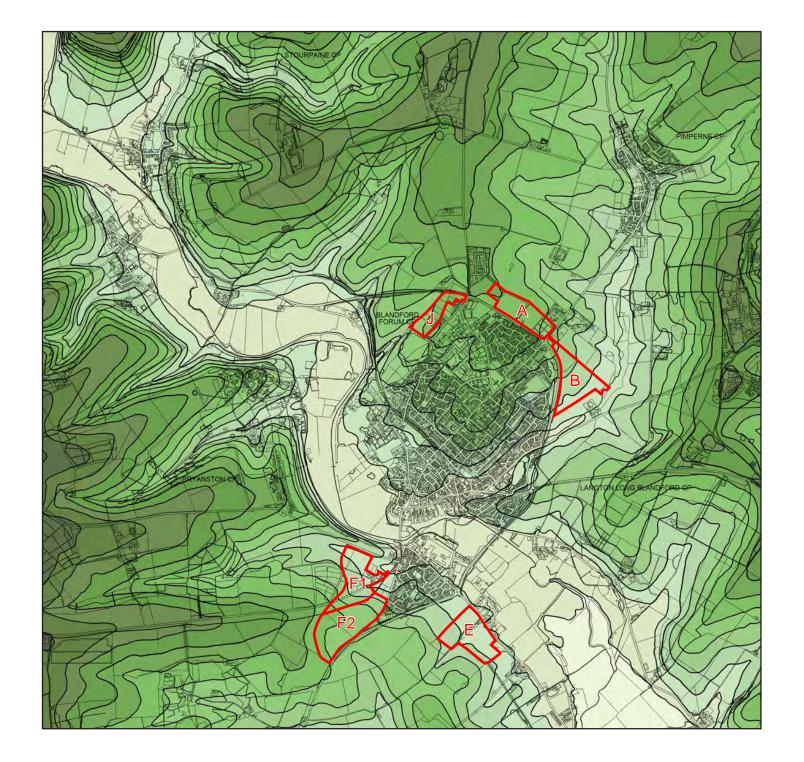
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Figure 1: Topography





1 INTRODUCTION

1.1 Background

1.1.1 This report considers the landscape related constraints and opportunities for future development around the settlements of Blandford Forum and Blandford St Mary. As a baseline to the detailed consideration of potential sites, the report includes a high level assessment of the potential strategic sites identified in the 2012 SHLAA. Sites that have performed well in the SHLAA and have been taken forward in the draft Neighbourhood Plan review (May 2018) are considered further with a view to consider the strengths and weaknesses of each site. The options for specific allocations in the Neighbourhood Plan are set out in the Preliminary Development Options Paper July 2018. These options are assessed in the light of the HDA appraisal of individual sites, with the aim of identifying the most appropriate location for an urban extension to Blandford Forum, in relation to the landscape constraints and opportunities around the town. This report was commissioned on behalf of Lewis Wyatt (Construction) Ltd, The West Pimperne Pool Trust, Mr C Coats and Mr T Coats.

1.2 Settlement Pattern

1.2.1 The existing settlement pattern of Blandford comprises the main town of Blandford Forum to the north of the River Stour and the smaller settlement of Blandford St Mary to the south. The historic cores of these two elements of Blandford are linked by Blandford Bridge which carries West Street over the River Stour, and was, until the construction of the A354 bypass (after 1988), the only available vehicular crossing of the river. The position of Blandford, on a wide sweep of the River Stour as it passes through a gap in the Dorset chalk downs, has therefore had a profound effect on the form of the settlement and its local character. From its origins adjacent to this important river crossing, Blandford Forum has expanded to the north and east from its historic core on its south-western edge, to rise up the surrounding valley sides onto the higher ground of the downs. Growth to the west has been restricted by the River Stour and its floodplain.

- 1.2.2 Blandford Forum thus sits on the southern edge of a spur of high ground with built form facing to the south-west and south over the River Stour valley and to the south-east and east over the smaller valley of the Pimperne Brook, which is a tributary of the River Stour. High ground rises to the east of the Pimperne Brook towards Monkton Down topped by the Blandford Military Camp. To the west the land rises to the downs beyond the wooded slopes of the Bryanston estate which form a green backdrop to the town.
- 1.2.3 The current settlement boundary around Blandford Forum is defined to the north-east and east by the bypass (A350/A354) between Shaftesbury Lane and the crossing of the River Stour. Between the river crossing of the A354 and Blandford Bridge, the settlement boundary follows the northern bank of the River Stour. From West Street, the western edge of the settlement boundary is defined by existing residential developments at River Mews and Parklands, and includes Deer Park Farm and The Blandford School, before re-joining the River Stour to the west of the school. Where the River Stour adjoins Milldown Road, the settlement boundary follows the north-western edge of The Milldown Site of Nature Conservation Importance (SNCI) before joining Tin Pot Lane along the north-western edge of Blandford Heights (Clump Farm) Industrial Estate, including Kites Farm (Kites Corner).
- 1.2.4 Blandford St Mary is defined by a separate settlement boundary, which, as with the Blandford Forum boundary, follows the bypass (A354) to the south. The settlement boundary to the west is defined by Dorchester Hill, including properties around its junction with Fair Mile Road and New Road. To the north, the settlement boundary is aligned along the river, before following the rear of The Brewery.
- 1.2.5 Another separate settlement boundary exists around Sunrise Business Park, which lies to the north of Blandford Forum, beyond the A350 bypass. This isolated cluster of industrial units originated as Blandford Farm Products back in the 1930s and thus had close links with farming businesses which proliferate on the downs.

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2 POLICY CONTEXT

2.1 Local Plan

- 2.1.1 The future residential needs of Blandford are the subject of Policy 16 of the Local Plan Part 1. This policy anticipates that at least 1,200 dwellings need to be built in Blandford between 2011 and 2031. The Local Plan Review, Issues and Options Consultation report (November 2017) identifies a development strategy that; "will see the building out of sites already allocated for development or with planning permission in the early part of the plan period, with additional greenfield sites beyond the bypass being brought forward after that date. New development will be supported by the necessary grey, social and green infrastructure, both to meet the overall needs of the town and the more local needs associated with each new development area." (page 30, paragraph 6.3):
- 2.1.2 North Dorset District Council is progressing its Local Plan Review on the basis that the local housing need is now 366 dwellings a year.

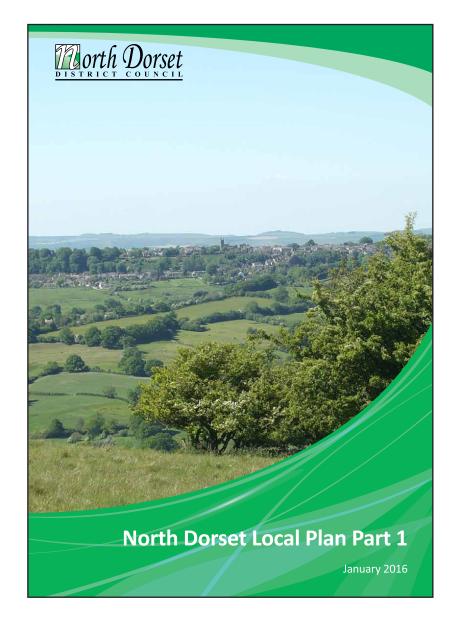
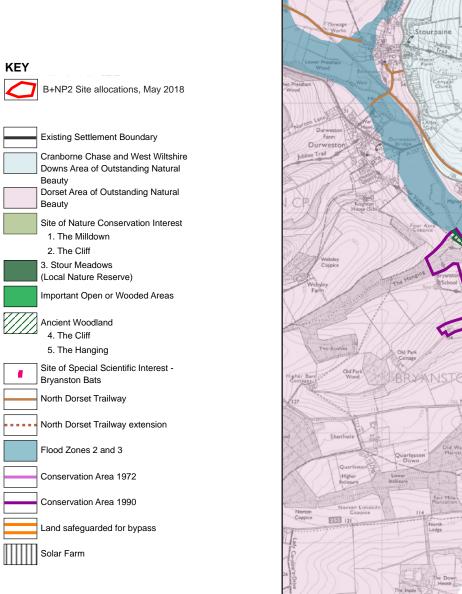
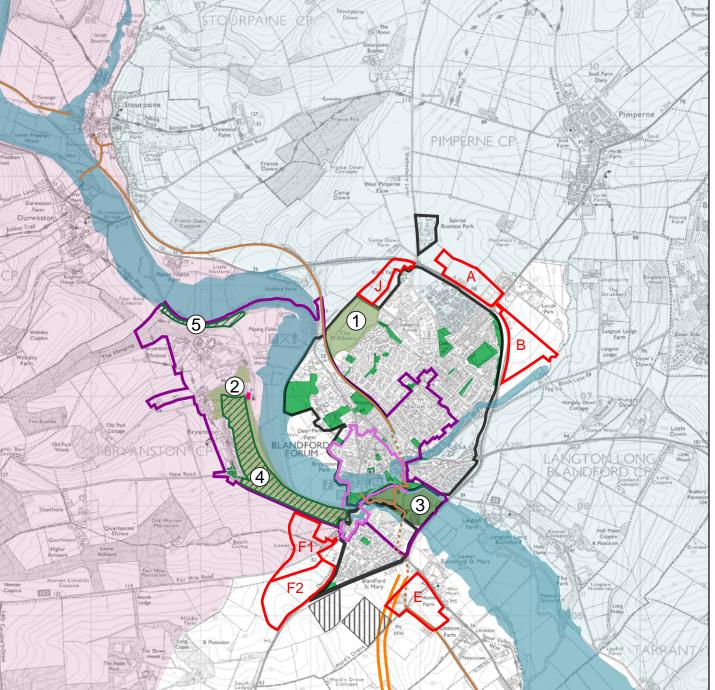


Figure 2: Constraints





3 CONSTRAINTS TO DEVELOPMENT

3.1 Introduction

- 3.1.1 The Local Plan Review Issues and Options report sets out the potential constraints to new development at Blandford:
- The Cranborne Chase and West Wiltshire Downs AONB and the Dorset AONB;
- Local nature reserves;
- Flood risk in connection with local watercourses including the River Stour;
- Heritage assets, including a conservation area that covers a large part of the town and land to the south of the town at Crown Meadows; and
- A constrained highway network, including in relation to the A354 and A350.
- 3.1.2 These constraints are very variable in how restrictive they are to development. It should be considered that flood risk is an absolute constraint to development, whereas building on a groundwater source protection area need not be ruled out, provided that measures are put in place that safeguard against the potential of new development to contaminate the underlying aquifer. Similarly, the potential effects of development on some nature conservation designations are likely to preclude those developments which result in the removal or isolation of certain habitats (such as ancient woodland), whereas some habitats can exist in association with development or can be readily recreated elsewhere.
- 3.1.3 The Council also recognises in its Sustainability Appraisal that a balanced judgement is required to determine the overall net effect of development. Each of the landscape related constraints are discussed below, addressed in the order that these issues are considered to be most restrictive to future development.

3.2 Flood Risk

- 3.2.1 The greatest constraint to the expansion of the town, to the south and west, is Flood Zone 2 and 3 of the River Stour and its associated tributary, the Pimperne Brook. The Flood Zone forms the separation between Blandford Forum to the north and Blandford St Mary to the south. Parts of Blandford Forum and Blandford St Mary are at risk of flooding from the River Stour, and flood defences have been constructed to reduce the risk to property. There is also the risk of flooding from the Pimperne Brook which could affect parts of Blandford Forum. The Pimperne Brook passes under the A354 just north of Black Lane, after which it is culverted along Black Lane, to join the River Stour to the south of East Street.
- 8.2.2 Within the National Planning Policy Framework (NPPF, 2018), Paragraphs 155 and 157 state that "inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk"..... "All plans should apply a sequential, risk-based approach to the location of development, taking into account the current and future impacts of climate change, so as to avoid where possible flood risk to people and property...." At the national level, therefore, new development is steered towards areas with the lowest probability of flooding.
- 3.2.3 The Council also recognises flood risk to be a major constraint to future development (policy 3 of the Local Plan).

Figure 3: Character areas



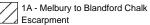
B+NP2 Site allocations, May 2018





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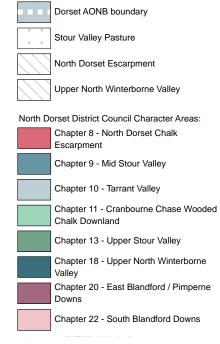
Cranbourne Chase AONB boundary

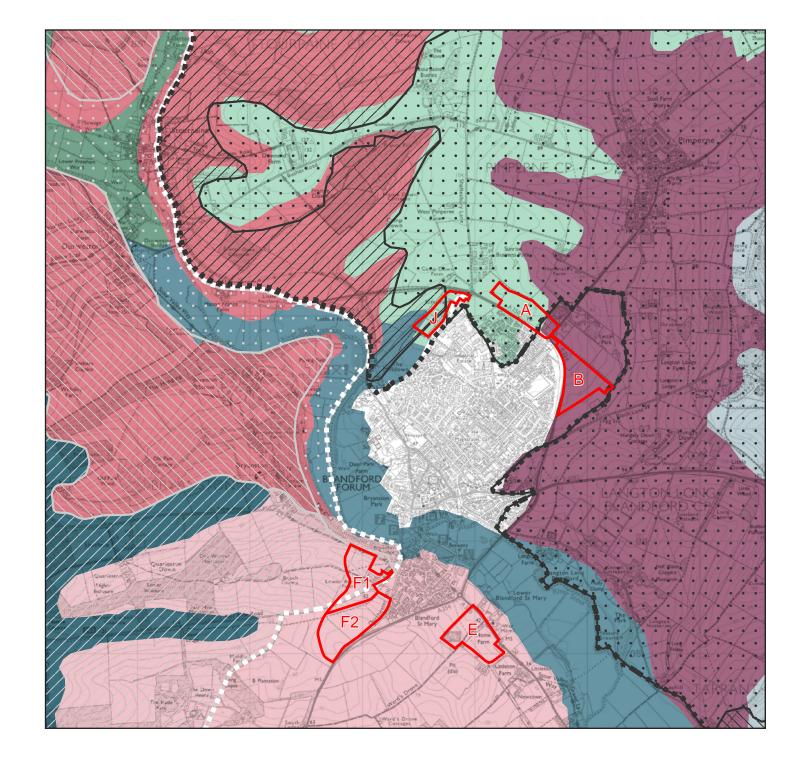


2B - Southern Downland Belt

5C - Stour and Avon Tributary Chalk Valleys

Dorset AONB Character Areas:





3.3 Areas of Outstanding Natural Beauty (AONB)

- 3.3.1 AONBs are afforded the highest level of protection within the NPPF. Paragraph 172 of the NPPF (2018) states: Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are important considerations in all these areas, and should be given great weight in National Parks and The Broads.
- 3.3.2 At the national level the AONB designation precludes development unless there are exceptional circumstances and where development can be demonstrated to be in the public interest. Strategic allocations for housing are considered major development and their allocation should have regard to the tests set out in paragraph 172 of the NPPF (2018). To justify exceptional circumstances for development in the AONB a strategic site assessment should:
- Firstly, identify the need for development if it is necessary to build in the AONB;
- Secondly, look at the scope for making use of land outside the AONB;
- Thirdly, make an assessment of the comparative adverse effects of development on sites being considered within and outside the AONB.
- 3.3.3 The Local Plan Part 1 recognises that small parts of the existing builtup area of Blandford lie within both AONBs (paragraph 8.18) and that where development is in the public interest that schemes should include appropriate mitigation (Policy 4)

3.4 Nature Conservation

- 3.4.1 There are no sites of international importance (e.g. Special Areas of Conservation) within 9km of Blandford, however, a Site of Special Scientific Interest (SSSI), which has importance at the national level, exists at Bryanston. The SSSI citation reads: "The large roof space in the derelict 18th century kitchens at Bryanston is the only known breeding site for the greater horseshoe bat (Rhinolophus ferrum-equinum) in Dorset and the colony is one of only 7 remaining in Britain."
- 3.4.2 The NPPF (2018) states that proposed development should not normally be permitted on land within or outside a SSSI if it is likely to have an adverse effect on that SSSI (paragraph 175). Given that bats are highly mobile and are likely to feed over locally available suitable habitats, then the extent of restrictions on potential development could be wide ranging. This is reflected at a local level with feeding areas being included in Local Nature Reserves at The Milldown and Stour Meadows.
- 3.4.3 Additionally, at the local level, Sites of Nature Conservation Interest (SNCI) include the north-western edge of The Milldown, a remnant area of chalk grassland, and The Cliff, an area of Ancient Woodland.

3.5 Heritage Assets

- 3.5.1 Heritage assets are afforded protection, those of the highest significance are scheduled monuments, grade I and II* listed buildings, grade I and II* registered parks and gardens and World Heritage Sites.
- 3.5.2 Blandford is a historic town and the Georgian town centre has long been recognised as being one of the finest in England. A Conservation Area was designated in 1972 to preserve and enhance Blandford's historic character. It was expanded in 1990 and sub-areas within it were subsequently identified. The town also includes a wide range of listed buildings.

3.6 Infrastructure Constraints

- 3.6.1 The expansion of the town to the north, east and south has currently been contained by the bypass of the A350 and A354. The 2003 Local Plan anticipated a southerly extension to the Blandford bypass with a safeguarding policy (Policy 5.22). Outline planning permission granted for 350 dwellings on land to the south east of Blandford St Mary (site 2/04/0460) (November 2016) includes the safeguarded route, to the west of the site, between the housing site and the recently completed solar park). Additional sites south of Blandford St. Mary would need to consider safeguarding land to maintain the potential for an extension to the bypass.
- 3.6.2 No other major infrastructure schemes are planned in and around Blandford for this plan period.

4 SHLAA 2012 SITES

4.1 INTRODUCTION

The 2012 SHLAA assessment considered sites around Blandford Forum and Blandford St Mary. Figure 4 identifies the 2012 SHLAA sites and the results if the SHLAA assessment; i.e. whether sites were to be included for further consideration by the District. The figure also identifies sites taken forward in the 2018 Neighbourhood Plan as potential development options (B+NP2).

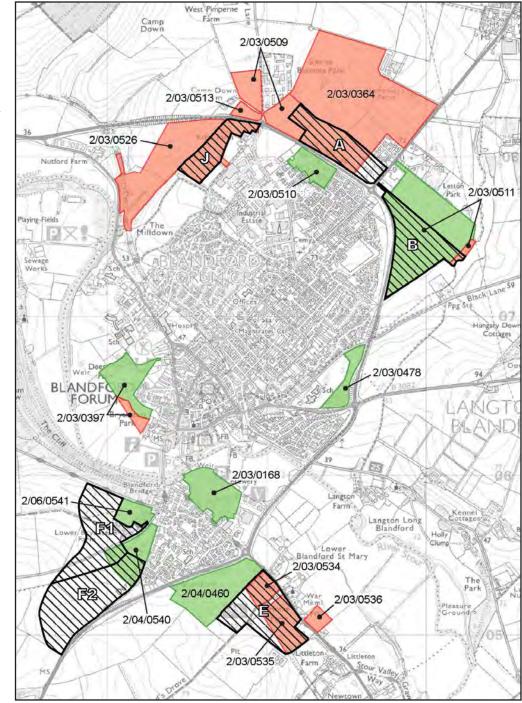




Figure 4: SHLAA 2012 and B+NP2 site locations

4 SHLAA 2012 SITES

Site Ref	Included/Excluded	North Dorset District Council Assessment	Site Ref in 2010 LIA	Site Ref in 2018 B+NP2
2-03-0168	Included (site with permission)	Planning application submitted, details to be agreed, flood prone areas not suitable for residential development		
2-03-0364	Excluded	Within AONB, detached from town therefore excluded		Area north of Site A
2-03-0397	Included	 Ground water source protection zone 3 Outside of settlement boundary Southern corner of site within flood zone 2&3 Fairly flat ground Area characterised by large houses in large plots Via Whitecliff Mill Street, unadopted track 	Part of Site 3	A separate Heritage assessment (2014) concluded that the impact of development on the site would result in substantial harm and less than substantial harm on the heritage assets. Not taken forward in NP.
2-03-0478	Included (site with permission)	Likely to start within five years, pressure from land owner on developer to start	Site 4	N/A
2-03-0509	Excluded	Within AONB and beyond the bypass.	Site 9B - northern half	
2-03-0509	Excluded	 Within AONB and beyond the bypass. On a site committed as playing fields in the Local Plan. These are required to serve Blandford and the wider area and therefore residential use is unacceptable. 	Site 9A (closest to A350)	Included in NP review as Site A
2-03-0510	Included (site with permission)	Allocated housing site still to be developed	Site 5	N/A
2-03-0511	Included	 Ground water source protection zone 1 Outside of settlement boundary South Eastern edge of site within flood zone 2&3 North Eastern Border has TPO area, south western boundary has TPO (outline). Site rises from southeast to northwest Currently no access other than two small tracks on A354 	Site 8	Site B (site assessed does not extend beyond the Neighbourhood Plan boundary)
2-03-0513	Excluded	Within AONB and beyond bypass. Impact on landscape would be significant. Amenity of prospective residents will be harmed by the adjacent employment uses therefore excluded	Site 9B - southern half	N/A
2-03-0526	Excluded	Outside of settlement boundary, exposed slope within AONB, highly visible from surrounding area therefore excluded	Site 7	Included in NP Review; Site J
2-03-0534	Excluded	Detached from settlement, extends development along already busy A350 corridor therefore excluded	North of Ward's Drove	Included in NP Review as part of Site E
2-03-0535	Excluded	Detached from settlement, extends development along already busy A350 corridor therefore excluded	South of Ward's Drove	Part of Site E

4 SHLAA 2012 SITES

Site Ref	Included/Excluded	Comments	Site Ref in 2010 LIA	Site Ref in 2018 B+NP2
2-03-0536	Excluded	Detached from settlement, extends development along already busy A350 corridor therefore excluded	South of Lower Blandford St Mary	East of A350
2-04-0460	Included (Site with permission)	 Ground water source protection zone 3 Outside of settlement boundary. Part covered by land reserved for Spetisbury/Charlton Marshall bypass. Old railway across the site. Flood zone 1 Large clump of trees in centre Old railway, potential for associated pollution Adjacent to bypass noise mitigation could reduce site size. Power lines cross the site Slopes up to the south then dips and rises again Open site, outside of bypass which would have impact on landscape Access would be off A350 	Site 1	N/A
2-04-0540	Included (part of site with permission)	 Ground water source protection zone 3 Outside settlement boundary. Eastern half of site within site of archaeological importance Flood zone 1 Trees in hedgerows which crosses site Site is gently sloping Access would need to be achieved, also issue of local road network 	Site 2	Included as part of Site F2 and F1
2-04-0541	Included	 Within AONB, ground water source protection zone 3 Outside of settlement boundary Flood zone 1 Some large trees on boundary near road Gentle slope up to the south west Potential for significant impact on AONB Existing access although impact on complicated road junction would need to be considered 	Site 6	Adjacent to site F1

The SHLAA assessment identified a number of committed sites as 'included' in the schedule of preferred sites, however no additional sites were identified as suitable for further assessment other than those included in the Neighbourhood Plan Spatial Options Appraisal. The following section provides a more detailed assessment of the individual spatial options.

Option Area	Designations and policy	Landscape analysis & Character area	Key Issues	Capacity summary / comments
A Land north of A350	Central and western fields in the Cranbourne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty	 Site A is a plateaux landscape located north of a dry valley feature near Hammett's Farm and the wider open downland around Pimperne. AONB landscape, within the site, comprises small arable fields with established hedgerow and treed boundaries, set within the Cranbourne Chase Wooded Chalk Downland Landscape Character Area. Non-AONB landscape, within the site, to the east comprises allotments, set within East Blandford/Pimperne Downs Landscape Character Area. No public footpaths cross the site. Pedestrian bridge links the site to existing housing south of the A350. Bridge currently unused and fenced-off. Western field lies adjacent to the Sunrise Business Park. Wider setting to Pimperne extends to the northern boundary of site A. Access to site through the allotments on Salisbury Road (A354). A350 set in a cutting with established wooded slopes. Blandford Forum largely contained in views from the north. Site well-enclosed and generally screened from the surrounding landscape. Lies adjacent to existing residential development on Salisbury Road. 	 Development in the AONB only in exceptional circumstances. Vulnerability to large scale development. Tall structures would be visually intrusive on the sky line. Maintain and enhance the boundary vegetation to minimise visual intrusion into wider AONB landscape. Maintain allotment provision should new allotment site be identified. Open up public access to site via the pedestrian bridge. Develop only visually contained areas of the site. Location of a 2 form entry school confirmed by the County Council as being required to serve the northern areas of the town. Wider setting to Pimperne to be maintained. 	Land outside the AONB is not visually intrusive and could be developed for housing as a logical extension to housing at Letton Close. AONB area excluded as a SHLAA site, but identified for recreation/open space uses. Subject to exceptional circumstances being identified land adjacent to the pedestrian bridge could provide a suitable location for a 'low-rise' school and associated open space with easy access to existing residential areas. Land west of the school site could provide replacement allotments on a level arable field.

Aerial





View north from roadside close to Pimperne

View east towards allotments and Letton Close

Option Area	Designations and policy	Landscape analysis & Character area	Key Issues	Capacity summary / comments
B Land north- east of Blandford Forum	Site B lies outside the Cranbourne and West Wiltshire Area of Outstanding Natural Beauty.	 Site B comprises arable fields which slope east and north-east towards the Pimperne Brook valley arable fields. The site lies within the East Blandford/Pimperne Downs landscape character area. The wider open downland setting to Pimperne extends south from the village to the northern edge of the parkland surrounding Langbourne House. Parkland trees and woodland around Letton Park and Langbourne House contain views of site B from the AONB to the north and west. Views of site B, from the south, within the Stour valley, are screened by a spur of land forming the eastern valley side of the Pimperne Brook. Views from the east are limited to the Wimborne Road, Black Lane and a limited number of footpaths within the AONB. Existing views include the town and existing eastern residential areas of Blandford Forum. Site B forms part of a larger parcel of arable land defined by Letton Park, the A354 corridor and a woodland belt along the Pimperne Brook corridor. The flood plain of the Pimperne Brook lies to the south and east of the southern boundary of the site. 	 The Option area lies outside the AONB. Relatively contained visual envelop, boundary woodland and establishing woodland planting to be maintained and enhanced. Development to consider setting to the AONB, noting the contribution the town already makes to the views from the AONB. New and improved access and pedestrian links to adjacent areas of Blandford to be considered. Wider setting to Pimperne to be maintained. Northern boundary of option area defined by Neighbourhood Plan boundary, need to consider wider landscape containment. Need for new development to form a coherent extension to the town. 	The option area is relatively unconstrained and lies outside the AONB. Included as a SHLAA site. The site could provide for a strategic allocation. Effects on setting to the AONB would be limited to east of the town where the town is already prominent in the view. There are opportunities to link to the town and site A via the Salisbury junction, provide pedestrian access to Black Lane and a new junction onto the A354. Additional capacity is available to the north of the option area. Setting to Pimperne would be unaffected.

Aerial





View from Wimbourne Road towards site B and Blandford Forum

· · ·	esignations nd policy	Landscape analysis & Character area	Key Issues	Capacity summary / comments
Lower Blandford St Mary South of Site 1 (2010) committed development	orth Dorset ailway – Sustrans pmoted, gionally important creational route 50). e crossed by ard's Drove dleway.	 Option Area E comprises two large, arable, rectangular fields on northern edge of South Blandford Downs Landscape Character Area, forming part of open chalk downland. Site is divided by historic bridleway of Ward's Drove; the site and bridleway rise from River Stour, lying to the west. Site contributes to distinctive field pattern of the wider area; it is bound by straight hedgerows with intermittent mature hedgerow trees. Site bound to north-east by the A350, beyond which lies the village of Lower Blandford St Mary, which is a distinct and separate settlement from Blandford St Mary. Site bound to north-east by Site 1 (350 dwellings granted in Nov 2016, including safeguarded route for bypass extension). A robust and well vegetated boundary lies between Site 1 and Option Area E. There are open views from Ward's Drove into site to either side of this bridleway. Properties of Baywood & Smallwood also have open views into site. 	 Comprehensive development of Option Area E would lead to coalescence of the village of Lower Blandford St Mary with the larger settlement of Blandford St Mary Development would extend the visual impact of the settlement into the wider land open landscape. Consider the setting to Grade II* listed church in Lower Blandford St Mary. Consider the expansion and potential overdevelopment of Blandford St Mary. Committed development along with Option Area E land would double the size of the settlement. 	Comprehensive development of Option Area E would lead to coalescence of settlements. Safeguarded route for the A354 would reduce development potential of the site. Further expansion of Blandford St Mary would result in a doubling of the size of settlement. No clear definition to the southern boundary of the Option Area with a substantial impact on the landscape character of the wider area. Site excluded from SHLAA sites.

Aerial





Settlement edge of village of Lower Blandford St Mary lies beyond A350. Arable field of Site E forms rural setting to village

Option Area	Designations and policy	Landscape analysis & Character area	Key Issues	Capacity summary / comments
F1 Lower Bryanston Farm West of Site 6 (2010)	Majority of Site is within Dorset AONB. Site crossed by Footpath and Bridleway. Fair Mile Road forms part of national cycle route 253. Planning application associated with Site 6 is awaiting decision.	 Site forms part of South Blandford Downs Landscape Character Area, which is part of open chalk downland. Away from the domestic, enclosed scale of farm complex of Lower Bryanston, the site is typical of undulating downland landscape. Site comprises two sloping, predominantly eastward facing, grazing paddocks associated with large scale farm buildings and imposing farmhouse (facing southwards over site) and an arable field south of Fair Mile Road. Site is bound to north by New Road and strong woodland belt of The Cliff. From its elevated position, views into site are possible over roadside hedge along New Road. Western boundary (does not coincide with straight hedgerow boundaries) is contiguous with open fields. Site lies to north and south of hedge-lined, sunken lane of Fair Mile Road, lying in southern part of site. Public rights of way cross the site providing links to countryside. 	 on a greenfield site within a designated landscape. Development would significantly expand the settlement of Blandford St Mary, encroaching into the AONB and open countryside. Development would reduce the amenity value of rights of way 	Site predominantly within AONB, thus development on rising and elevated land would have a significant negative landscape and visual impact on the wider character of the AONB and setting of Blandford St Mary. Connectivity of site to rest of settlement would be dependent on treatment of new urban edge treatment within Site 6.

Aerial

Photograph/s showing key characteristics





Looking east towards Lower Bryanston Farm with Blandford St Mary beyond, including new permitted development

Option Area	Designations and policy	Landscape analysis & Character area	Key Issues	Capacity summary / comments
F2 North of A354/ Dorches- ter Hill and south of Fair Mile Road South-west of Site 2 (2010)	Not within Dorset AONB. Closed-off southern end of Dorchester Hill forms pedestrian/cycle link onto A354.	 Site forms part of South Blandford Downs Landscape Character Area, which is part of open chalk downland. The site is detached from existing enclosed, intimate scale of residential development east of Dorchester Hill, and that currently being built on Site 2. The linear nature of the site would extend built development out into the wider rural landscape which is currently rural undulating downland landscape divorced from the settlement. Site comprises three sloping, arable fields, rising to evident ridge which cuts across south-easternmost field of site. Site is bound to the south-east by dense vegetation along Dorchester Hill and its continuation onto the A354, Northern boundary follows an historic hedge (Parish Boundary) rather than following logical boundary of sunken Fair Mile Road Arbitrary western boundary through middle of open field. There is the potential for open views into site from New Road (to north of Site F1) particularly of more exposed south-western end of site, due to its elevation. Within a ground water source protection zone. Includes a site of archaeological importance. 	 Development would impact on undeveloped arable fields currently isolated from rest of settlement pattern by robust hedgerows (particularly between Site 2 and the site). Development would be on greenfield land adjacent to the AONB and would have a negative impact on the character and setting of the AONB. Development on the elevated parts of the site should be avoided as this would have a greater negative impact on the character and setting of the AONB. 	Site lies outside the Dorset AONB and is included as a site in the SHLAA. However it is poorly related to the existing settlement. Development would increase the visual envelope of the existing settlement and would negatively impact on the wider landscape character. In views from New Road, any new development would break the skyline. No clear definition to the western boundary of the Option Area with a negative impact on the landscape character of the wider area.

Aerial





Looking north-east down Dorchester Hill with site F2 lying over hedge on left-hand side



Looking north-west across site F2 from A354 Blandford Bypass where it crosses a localised ridge

Option Area	Designations and policy	Landscape analysis & Character area	Key Issues	Capacity summary / comments
J Land west of Tin Pot Lane (employment/ education only)	Site J is wholly within the Cranbourne Chase and West Wiltshire Area of Outstanding Natural Beauty	 Site J comprises west facing slopes, forming part of a broad dry valley running south to the River Stour. The AONB landscape comprises small and medium sized fields in pasture with occasional boundary hedgerows and trees. Fields generally contained with rail fencing. Site set within the Mid Stour Valley and Cranbourne Chase Wooded Chalk Downland. Views of the town largely screened by existing woodland and topography to the east of the site. Visual envelope of site J, from the AONB, is extensive to the south and west. Views from the adjacent sections of the A350 include the site and the wider AONB. No public footpaths cross the site but National Cycle Route 25 follows old railway line to the west. Site forms part of a stud farm and lies adjacent to small holdings and 5-6 houses at Kite's Corner. Current access off Tin Pot Lane, a narrow lane without footways. Local nature reserve, The Milldown, lies adjacent to southern boundary. 	 Location of a 2 form entry school confirmed by the County Council as 	Landscape and visual impacts of developing in the AONB considerable. New development would be poorly related to existing town. Substantial increase in visual impact of the town on the AONB. Existing industrial estate isolates the site from the town in terms of access for a future school development. Site excluded from SHLAA sites. The site is unsuitable as a strategic site for employment/ education development.

Aerial





View north along Tin Pot Lane





View north-west acroSs site J towards A350

View south-east across site J from A35018

6.1 INTRODUCTION

The specific allocation options are set out in the Neighbourhood Plan: Preliminary Development Options paper July 2018. Four options are identified and the following assessment is intended to provide a review of the salient features of the combined sites and an assessment of the likely landscape and visual impacts that may arise.

Development Option	Designations and policy	Key Issues	Summary
1 Sites A and B	Site B is not within an AONB, however Site A lies largely within Cranbourne Chase and West Wiltshire AONB, the eastern end, currently allotments, is adjacent but outside the AONB.	 Site A largely lies within the AONB, although, situated on a plateau at the southern edge of the AONB the site is not visible from the wider AONB and makes a minimal contribution to the wider setting of Pimperne. Major development in the AONB is only acceptable in exceptional circumstances. The urgent need for a new primary school may establish exceptional circumstances and could overcome the identified constraints to development on site A i.e. vulnerability to large scale development, in particular tall structures which would be visually intrusive on the sky line. A school building should be visually unobtrusive and designed to respect the AONB and visual impact. The open space provision identified in the SHLAA and 2003 Local Plan could be served by site A with public access to site via the pedestrian bridge over the A350 and the Salisbury roundabout. The access would facilitate use by existing residential areas for a new 2 form entry school (confirmed by the County Council as being required to serve the northern areas of the town). Additional Green Infrastructure could maintain and enhance the boundary vegetation to minimise visual intrusion into wider AONB landscape. The western field within the site could provide an alternative location for allotment provision and maintain continuity of provision for allotments. Site B lies outside the AONB, it has a relatively contained visual envelope, with boundary woodland and establishing woodland planting screening views from the north, west and south, new planting could maintain and enhance that enclosure. The setting to the AONB to the north and west would be unaffected by development on site B. The northern boundary of option area defined by Neighbourhood Plan boundary, needs to considered to include land enclosed by landscape features in the surrounding landscape. New and improved access and pedestrian links to adjacent areas of Blandford could be p	Site B is relatively unconstrained and lies outside the AONB. Effects on setting to the AONB would be limited to east of the town where the town is already prominent in the view. There are opportunities to link to the town and site A via the Salisbury junction, provide pedestrian access to Black Lane and a new junction onto the A354. Setting to Pimperne would be unaffected. Land outside the AONB in site A is not visually intrusive and could be developed for housing as a logical extension to housing at Letton Close. The AONB within site A, excluded as a SHLAA site, has been identified in the Adopted Local Plan to 2011 (Policy 4.5 (.1), land north-east of bypass (12/2/1)), as a site committed as playing fields. Subject to exceptional circumstances being identified, land adjacent to the pedestrian bridge could provide a suitable location for a 'low-rise' school and associated open space and playing fields with easy access to existing residential areas. Land west of the proposed school site could provide replacement allotments on a level arable field. Sites A and B are included as SHLAA sites 2/03/0364 and 2/03/0511, which could provide for a comprehensive strategic allocation.

Development Option	Designations and policy	Key Issues	Summary
2 Sites F1 and F2	Majority of Site F1 (north of Fair Mile Road) is within Dorset AONB. Ancient woodland (and SNCI) to north of Site F1 (The Cliff). Site F1 crossed by Footpath (E5/3) and Bridleway (E5/4). Fair Mile Road forms part of national cycle route 253 (in proximity to both sites). Stour Valley Walk to north of Site F1, along New Road. Adjacent to committed sites.	 Both greenfield sites lie within the South Blandford Downs Landscape Character Area, and have characteristics typical of an open chalk downland landscape. The landscape value of these sites is high as they are either within the AONB designation or abut it. Development would impact on the open, undeveloped nature of these sites and have a direct and adverse effect the qualities for which the AONB is designated. There are open views across both sites from downland ridges to south of sites (from Fair Mile Road) and from elevated sections of New Road, unrelated to the town. The western boundaries to both option areas are arbitrary, not defined by features on the ground, such as hedgerows, or by topography. The sites are therefore uncontained and with no definition which could be utilised to create new and robust settlement edge. Disproportionate amount of Blandford's expansion would be concentrated south-west of Blandford St Mary, doubling the size of the settlement. Development would be further removed from services and facilities in Blandford Forum (restricted to single crossing of the River Stour). Recreational links into the open countryside would be impacted upon by the intrusion of urbanisation extending up to, and potentially enclosing, rights of way. The proposed allocation would not address the identified need for a primary school in the northern half of Blandford Forum. 	Exceptional circumstances would be required to support a housing allocation in the AONB. Development of these sites would not conserve the distinctive open character of the AONB and its setting in this area and would extend the visual envelope of Blandford into the wider landscape. Location would not provide a school in a position to serve the north of the town. Recreation within and adjoining the AONB would be compromised by new development.

Development Option	Designations and policy	Key Issues	Summary
3 Sites F1 and J Lower Bryanston Farm (adj Site 6) plus land west of Tin Pot Lane	Site J wholly within Cranbourne Chase and West Wiltshire AONB and majority of Site F1 is within Dorset AONB. Site F1 crossed by Footpath (E5/3) and Bridleway (E5/4). Fair Mile Road (through Site F1) forms part of national cycle route 253. Stour Valley Walk to north of Site F1, along New Road. Adjacent to local nature reserves including The Milldown	 Both of these greenfield sites, for the most part, lie within landscapes designated at a national level as AONB, reflecting their high landscape value. Major development in the AONB should only be considered once all options outside the AONB have been exhausted. Combined sites do not provide required quantum of housing. Site F1 is detached from the main settlement by ancient woodland along The Cliff to the north. Similarly, Site J is screened from the town by existing woodland and topography to the east of the site. Both sites lie adjacent to Sites of Nature Conservation Interest (The Cliff adjacent to Site F1 and The Milldown (also Local Nature Reserve) adjacent to Site J). Site access would require substantial improvement and likely to affect the character and appearance of the minor roads in the area. Site J although located to the north of the town is separated from the town by the existing industrial estate with poor access and limited opportunity for improvement to routes to residential areas. Although Site F1 lies adjacent to the committed housing Site 6, a decision is awaited. An objection has been lodged by NDDC Landscape Officer to Site 6 on grounds of "significant impact on the wider landscape character and some key visual receptors" which could equally apply to Site F1, and given its higher elevation and less enclosed nature, could be considered to be more detrimental than Site 6. 	Exceptional circumstances would need to be demonstrated for new major developments in the AONB. Development of these sites would directly impact upon the distinctive open character of the AONB and affect the wider rural area. The development option represents the worst combination of sites, as both impact on AONB and are unlikely to meet the overall development brief as set out in the NP options strategy.

Development Option	Designations and policy	Key Issues	Capacity summary / comments
4 Sites F2 and J North of A354/ Dorchester Hill & south of Fair Mile Road (adj Site 2) together with land west of Tin Pot Lane	Site F2 not within Dorset AONB, but Site J wholly within Cranbourne Chase and West Wiltshire AONB. Southern end of Dorchester Hill (closed to traffic) to east of Site F2 forms pedestrian/ cycle link onto A354.	 Both are greenfield sites, with Site J lying wholly within the AONB, and Site F2 being prominent in views from the Dorset AONB. Both sites have a high landscape value. Combined sites do not provide required quantity of housing. Site F2 is largely detached from the existing settlement. A dense, tall hedgerow, along the northern site separates Site F2 from permitted development (east of Dorchester Hill, off Folly Lane). Development of Site F2 would thus be remote from existing settlement and would extend a finger of development south along the A354 bypass into open countryside. The southern approach to the town is currently rural and largely unaffected by the settlement Site F2 would be prominent in this view and substantially extend the visual envelope of Blandford St Mary. Site J is detached from the existing settlement (separated by two sites adjoining Tin Pot Lane, on which decisions for recent planning applications for housing are pending) it is visually unrelated to the existing built form of the town. Both sites are visually prominent sites in views from the wider AONB. 	Exceptional circumstances would need to be demonstrated for major development on Site J, which would directly impact upon the AONB. Development of Site F2 would affect the setting of the AONB through the loss of the site's distinctive open character which is largely unrelated to the built form of the town. Access to site J would require significant upgrades to Tin Pot Lane affecting the character and appearance of the lane and adjacent AONB. Housing (subject to determination) could potentially sit between the proposed employment site and the existing industrial estate. Neither site would provide an appropriate site for the location of a new primary school.

Blandford + Neighbourhood Plan 2 (2011-2037) 6.2 **Pre-Submission Plan**

6.2.1 The Pre-Submission Plan for Blandford Forum was published in 6.2.2 The Pre-Submission Neighbourhood Plan is supported by a Sustainability November 2018 and sets out the policies for the plan period and the preferred site allocations for housing, education and employment. Option 1, which includes parcels A and B, forms the main focus of the Neighbourhood Plan allocations for housing and education and the allocation is set out in detail at Policy B2 - Land North & East of **Blandford Forum**

Policy B2 "The Neighbourhood Plan allocates land to the North and North East of Blandford Forum, as shown on the Policies Map, for a mix 6.2.3 of residential, education, community and allotment uses.

Development proposals for the land will be supported, provided:

i. The residential scheme comprises approx. 400 dwellings including open market, starter, affordable rent and self-build homes, primarily located on land to the north-east of Blandford Forum:

ii. The education scheme comprises a new two form entry primary school with integrated early years provision;

iii. The education scheme shall be confined to land to the north of Blandford of about 3 hectares and of a regular form to enable school expansion to three form entry and in a convenient position to facilitate the use of the existing A350 pedestrian bridge;

iv. The community hub scheme comprises a new general practice facility, a community centre and convenience shop to serve the locality; and

v. The Lamperd's Field Allotments are relocated to a single location to the west of their current position and comprise land of approximately 2.5 hectares and ancillary facilities that meet or exceed the standards of the existing site;"

- Appraisal (SA) which assesses all four options. The Appraisal provides a discussion of the potential effects of the options with summary tables that evaluate the performance of each option and identifies any significant adverse effects. With regard to the assessment of Landscape and Historic environment the tabulated summary identifies Option 1 as "category 1", the most favourable option and best performing option with regard to effects on the landscape and historic environment.
- The discussion of potential effects on landscape and historic environment, in the SA, pages 35-36, includes two inaccuracies. Firstly, area A does not fall wholly within the Cranbourne Chase AONB. The eastern portion (the existing allotments) is outside the AONB, correctly illustrated on the SA spatial options and environmental constraints plan Fig. 4.4 but wrongly referenced in the text. Secondly, Historic Urban Character Area 5 has a Low sensitivity to large scale development, not High as referenced in the SA text (page 36). Both corrections would reduce the potential for impacts on the landscape and historic environment and should reinforce the overall findings of the SA.

7 CONCLUSIONS

- 7.1 This review of North Dorset District Council's SHLAA and the 7.6 Neighbourhood Plan development options review has identified a number of shortcomings of sites in relation to their potential effects on the AONB landscapes which surround Blandford Forum and Blandford St Mary.
- 7.2 Specifically, site J is not a suitable location for large scale development, given the potential effects on the open rural landscapes of the AONB west of the town. Similarly site F1 would result in substantial direct adverse effects on the Dorset AONB to the south and west. As set out in the Framework (NPPF), the AONB has the highest level of protection. Strategic sites for new development should, therefore, be directed away from the AONB and make best use of adjoining areas of non-AONB landscape. Small scale development on the edges of the AONBs around Blandford may be acceptable, subject to appropriate mitigation and an identified need.
- 7.3 Given that all sites considered for future strategic development are either within or adjacent to the AONB's around Blandford Forum or Blandford St Mary the context of each site, particularly the existing influence of the town on the setting to the AONB, should be considered. Sites where adjacent areas of the town are already part of the view and form part of the setting to the AONB should be preferred to sites that would widen the visual envelope of the town affecting undeveloped areas of land 7.9 which currently provide a rural setting to the AONB.
- 7.4 Of the options considered in the Neighbourhood Plan review, options that include site F2 would significantly widen the visual envelope of the town and adversely affect the existing rural character of the setting of the AONB to the south of the town.
- 7.5 Option 1 (sites A and B) provides the 'best fit' to the Plan's aspiration for a new school north of the town and a strategic housing site.

- Direct impacts on the AONB, associated with development on site A, would be limited and could be substantially mitigated through structural planting based on existing well-established boundaries. The effects on the wider AONB and the wider setting to Pimperne would be very limited and could similarly be mitigated with additional boundary and internal planting.
- 7.7 A housing allocation could be located on non-AONB land in close proximity to the potential site for a new school and local facilities. Site B, outside the AONB, would provide the most appropriate location for the housing allocation. The site would form an extension to Blandford Forum where there is already a panoramic view of the town and where new development would not extend the visual envelope of the town into unaffected areas of the wider countryside.
- 7.8 Site B has the benefit of mature tree belts to the north and south-east of the proposed allocation. There are also additional areas of more recently established tree planting to the north-east of the site and along the A354 road corridor. This existing green infrastructure currently contains the site and limits the visual envelope of landscape affected by development to the high ground to the east of the potential allocation, part of the setting to the town and the AONB.
 - A landscape planting strategy based on enhancing the existing woodland and hedgerow structure and incorporating extensive new tree planting, within the development area, would soften the appearance of new housing from the AONB. To further reduce the apparent scale of the allocation, new tree planting following the existing contours, in the form of informal avenues or corridors, could both compartmentalise the potential housing allocation and provide a strong internal landscape structure to the development. Such an approach, along with a reduction in housing densities and the provision of informal open space to the periphery of the site, would also provide an appropriate transition between the proposed allocation and the surrounding countryside.

DOCUMENT CONTROL

HDA Document Control and Quality Assurance Record

Project Title:	Blandford Forum
Project Reference:	813.21/v8/BD
Document Title:	Blandford Forum NP: Landscape review of potential sites
Commissioning Party:	Wyatt Homes, The West Pimperne Pool Trust et al.

Issue	Description	Date of Issue	Signed
1	Final	24/08/2018	
2	Final	4/12/2018	
3	Final	13/12/2018	

	Personnel	Position
Author	B J Duckett	Director
Approved for issue	B J Duckett	Director

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