

For office use only	
Batch number: _____	Received: _____
Representor ID # _____	Ack: _____
Representation # _____	



# North Dorset Local Plan Part 1 Main Modifications Consultation 24 July to 18 September 2015

Town and Country Planning (Local Planning) (England) Regulations 2012

## Response Form

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

This is a formal consultation on the legal compliance and soundness of the Local Plan as amended by Main Modifications. The Inspector produced a note on his preliminary findings into the North Dorset Local Plan Part 1 and this was published on 9 June 2015. The Inspector and the Council wish to be informed about any representations on the proposed main modifications to the Local Plan. Details of the Main Modification documents are available on the Council's web page below:

[www.dorsetyoforyou.com/northdorsetlocalplanmainmod](http://www.dorsetyoforyou.com/northdorsetlocalplanmainmod)

Please return completed forms to:

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

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

Deadline: Midnight on 18 September 2015. Representations received after this time may not be accepted.

### Part A – Personal details

This part of the form must be completed by all people making representations as anonymous comments cannot be accepted. Representations cannot be treated in confidence as Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our web site, although they will be shown on paper copies that will be sent to the Inspector and available for inspection.

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

Personal Details (if applicable)*		Agent's Details (if applicable)*
Title		
First Name	Sara	
Last Name	Loch	
Job Title (where relevant)	Chairman	
Organisation (where relevant)	Blandford +	
Address	Blandford Forum Town Council	
Postcode	DT11 7AD	
Tel. No.		
Email Address		

## Part B – Representation

Please tick if you wish to be updated on the progress of this document

1. Which proposed Main Modification are you commenting on? (please insert the MM reference number from column 1 in the consultation document)

MM14
------

2. Do you support this Main Modification? (i.e. do you think it is sound and/or legally compliant)

Yes

No

3. If no, in summary, why do you not support the proposed main modification?

It has not been positively prepared

It is not justified

It is not effective

It is not consistent with national policy

It does not comply with the law

4. What would you like to happen?

Delete the proposed modification

Amend the proposed modification – you should suggest amended wording below

Add a new policy or paragraph – you should suggest new wording below

(Please give further details or suggested wording in box 6)

5. If there is an additional Examination Hearing Session, would you like to participate?

No, I do not wish to participate

Yes, I would like to participate

**6. Your Comments**

Please provide more details as to

- Why you do/do not feel that the proposed modification meets the soundness criteria set out in Question 3.
- What changes to the proposed modification wording/new wording you are suggesting.
- What additional policies or wording you are suggesting.

To assist the Inspector please try to be as concise as possible. For longer responses a brief summary would also be helpful for the Inspector.

See separate sheet.

*Continue on a separate sheet if necessary*

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

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

This button should attach your form to a pre-addressed email, if it does not, please save the form and send it to [planningpolicy@north-dorset.gov.uk](mailto:planningpolicy@north-dorset.gov.uk)

Click to Submit



## **BLANDFORD PLUS NEIGHBOURHOOD PLAN STEERING GROUP**

### **Representation on North Dorset Local Plan Part 1 Main Modifications**

#### Purpose

The purpose of this representation is to inform the Inspector of the North Dorset Local Plan Part 1 (NDLP1) of the continued objection of the Steering Group to the contents of the NDLP1, as proposed in the Main Modifications published in July 2015, on behalf of the constituent local councils of Blandford Forum Town, Blandford St Mary Parish and Bryanston Parish.

#### Background

The Steering Group objected to the provisions of the NDLP1 in respect of its strategy and land use proposals for the Blandford Forum area. The Group made representations to the submission NDLP1 at the Examination Hearing in March 2015 and responded to the invitation of the Inspector with further representations in May 2015 (see Appendix A below). In essence, the Group believes the NDLP1 to be unsound in relation to its Policy 16, and as a result to other policies, as a consequence of its proposals for the growth of the town beyond Blandford St Mary, which are unsustainable and not properly justified. Further, the District Council has not corrected the previous flaws in its Sustainability Appraisal of the NDLP1, which does not meet the requirements of the Environmental Assessment of Projects and Programmes Regulations 2004.

## Analysis

The Group considers that its letter sent in response to the Inspector's invitation still stands. The group has been unable to secure an answer from the District Council with regards to the matters it raised on the Blandford strategy in the NDLP1 at the hearing, and the main modifications fail to address matters of considerable importance to our local communities and which our consultation to date has indicated considerable support.

Since May 2015, further consultations with the landowners of land north and east of the town and with Dorset County Council have revealed significant progress has been made in proposals for business development and the provision of a new primary school in that location. The land is also being assessed for its potential to relocate the existing recycling centre and to establish a larger further education facility for the town. In addition, the landowners have undertaken work to address the concerns raised by the District Council in 2010 of developing land (for an equivalent scale housing scheme of that proposed around Blandford St Mary) that is inside and outside the AONB and of its flood risk, biodiversity and traffic impacts.

Not only does this progress highlight the benefits of the growth strategy proposed by the Group, it also reinforces the weaknesses in the NDLP1 growth strategy on the opposite side of the town furthest away from this new employment and social infrastructure. Planning for major housing growth on one side of the town and the new social infrastructure to support it on the opposite side cannot be considered sensible or sustainable. It will result in many more traffic movements through the historic town centre and around an increasingly congested bypass than is necessary.

The fact that the District Council, which is familiar with much of this progress and has made some modifications to NDLP1 to allow for it, has chosen not to assess the growth strategy as a 'reasonable alternative' in its Sustainability Appraisal now, or indeed at any time since 2010, means the NDLP1 cannot be properly justified.

In the absence of that assessment, the Group has undertaken its own comparison of the two alternative growth strategies (see Appendix B). This follows on from the comparison included in its representation in March 2015 and updates it to reflect the District Council's appraisal of the Main Modifications. Again, the alternative growth strategy out-performs the preferred strategy across a range of sustainability measures, most notably those related to improved social outcomes. The District Council has once again chosen to allow one of fifteen measures – landscape impact – to dominate all others but not to allow the opportunity for

additional landscape assessment work to be undertaken of the alternative to demonstrate how impacts on the land, much of which lies outside the AONB boundary, can be successfully mitigated.

### Conclusions

The comparative assessment clearly illustrates a spatial strategy based on the 'Blandford Forum Town Growth' alternative is significantly more sustainable when tested against the preferred strategy. This is not least because of its ability to support the delivery of essential social infrastructure, which is in alarming and growing deficit as evidenced by the Infrastructure Delivery Plan of the NDLP1 (of Nov 2014). The District Council's preferred approach of sticking to its flawed strategy but allowing for the Neighbourhood Plan to propose additional allocations, will fail to address this.

For the reasons outlined, the Blandford + Neighbourhood Plan Steering Group does not consider that the main modifications have been positively prepared, are justified, are consistent with national policy and do not comply with EU Directive the law.

## **APPENDIX A**

Dear Mr Hogger,

### **North Dorset Local Plan Examination: Additional Mid Hearing Written Material**

Thank you for inviting the Blandford + Neighbourhood Plan Steering Group to comment on the above material prepared by the District Council to answer your queries following the recent hearing sessions on the Local Plan Part 1 (NDLP1).

In general, the Steering Group is greatly disappointed that the District Council has not responded to the matters it raised on the Blandford strategy in the NDLP1 at the hearing, and which it anticipated you would want covered, given the debate that was had. These matters were of considerable importance to our local communities and we would have expected the District Council to have at least made some statement within the relevant explanatory notes (notably docs MHD006 and/or MHD011).

To make matters worse, in addressing the need to extend the plan period to 2031, which we support in principle, the District Council has chosen to significantly increase the size of the least sustainable site on the edge of Blandford St Mary to 450 homes. Once again, this is seen only as a 'minor modification' requiring no re-assessment in the SA/SEA of the reasonable alternatives, which is especially concerning in the light of the doubt thrown on the deliverability of the other two sites on the edge of the village. Such a proposal cannot in our view be seen as such and raises major concerns on how the social infrastructure needed by the town will be provided.

A housing scheme of 450 homes in this location will neither be able to afford to make provision for a new primary school and GP surgery and nor would those facilities be able to serve the town even if they were viable. The District Council has conspicuously avoided making such demands of the scheme in its Policy 16. That quantum of development, although more than sufficient to create capacity problems for existing facilities, would not normally be sufficient to pay for those types of facilities and the land budget cannot accommodate the 2Ha – 3Ha required for those purposes without extending further into the countryside to the south. In any event, there is already a primary school in the village (which cannot be extended) and there is no sense in providing another school south of the town when the real demand is to serve pupils living in the northern half of the town. Similarly, the

existing GP surgeries are in the town centre, which is reasonably accessible for the town population, but their expansion will not be easy. And the main demand for such services lies in its northern and eastern areas.

The Schedule of Changes Arising from the Hearing Sessions (MHD018) acknowledges this issue in its ref 7/14/14, which refers to the need for a *"careful assessment of the need for, and location of, new facilities in the town"*. In addition, ref 8/16/9, states *"potential growth in Blandford will require additional medical provision which can either be provided through expansion of the existing medical centre or by the development of a new surgery ... if necessary, land can be allocated through the ... neighbourhood planning process"*.

In the view of the Steering Group, that 'careful assessment' has been done and the local community has demonstrated through the recent household survey that it is persuaded of the advantages of using land to the north or east of the town to make provision for a new primary school as part of a sustainable urban extension. Further, the development of a new GP surgery to serve the town is the most sensible and realisable option and the same urban extension will be able to deliver that too. The Steering Group has already discussed these matters with the landowners, the county council and the local surgeries and is confident its Neighbourhood Plan will be able to make deliverable proposals in due course.

In doing so, the Steering Group will be mindful of the proposed change (ref 8/16/8 in the Schedule) to para 8.13 of the supporting text to Policy 16, which appears to enable the Neighbourhood Plan to make provision for "additional greenfield sites beyond the by-pass". No other reference is made to this by the District Council in its explanatory notes but we are assuming it enables our Neighbourhood Plan to allocate a series of sites to the north and east of the town for sustainable development and we therefore approve of this change. We will now do so in partnership with the landowners, being mindful of the District Council's expressed reservations about the landscape sensitivity of this area (repeated in its note ref MHD011 but offering no new insights on the matter) and how important it will be to require effective mitigation measures.

In summary, although some of the proposed 'minor modifications' to policies 6, 14 and 16 are welcomed, they are not sufficient for the Steering Group to withdraw its objections. We will therefore make further representations during the public consultation period on the proposed modifications and we expect the District Council to justify their soundness through a review of the Sustainability Appraisal.



This letter was discussed and approved by the full Steering Group at its meeting on 14 May 2015 and it is authorised to be submitted on behalf of Blandford Forum Town Council, Blandford St Mary Parish Council and Bryanston Parish Council.

Yours sincerely,

Sara Loch  
Chairman of Blandford +  
c/o Blandford Forum Town Council  
Town Clerk's Office  
Church Lane  
Blandford Forum  
DT11 7AD

## APPENDIX B

### COMPARISON OF NDLP1 POLICY 16 & REASONABLE ALTERNATIVE AT BLANDFORD FORUM

POLICY 16 BLANDFORD SITES			BLANDFORD ST MARY		BLANDFORD FORUM	
SA OBJECTIVES			NDDC*	B+NP	NDDC**	B+NP
Social progress that recognises the needs of everyone	1	Provide housing including affordable housing that meets the needs of the community	++	++	++	++
	2	Create balanced communities where housing, employment and community facilities are delivered to meet needs, improving access to essential services	-	-	-	+
	3	Improve the health and wellbeing of the population through reducing poverty and encouraging healthy lifestyles	?	0	-	+
	4	Reduce barriers to individuals participating fully in their community promoting a strong, vibrant and inclusive way of life	-	-	+	+
	5	Improve quality of life through well designed inclusive developments	0	-	0	+
Effective protection	6	Reduce the impact of climate change, including flood risk and make best use of the opportunities that arise	0	0	-	0

	7	Protect and where opportunities arise, enhance habitats and biodiversity	?	?	-	0
	8	Improve the quality of the built environment, protecting the District's heritage assets and distinct townscapes and recognise opportunities that arise	-	-	-	0
	9	Recognise the importance of the district's distinct rural landscapes beyond just the aesthetic value	-	-	-	-
Prudent use of natural resources	10	Reduce impacts on the environment	-	-	-	-
	11	Reduce pressure on the district's natural resources, reducing waste and promoting the wise use, reuse and recycling of land and resources	-	-	-	+
	12	Promote energy and resource efficiency, encouraging clean energy production	+	+	+	+
Maintain	13	Improve the competitiveness of the district's economy through provision of the necessary infrastructure for a more sustainable economy	?	-	0	++

14	Enable local needs to be met locally, encouraging more sustainable forms of travel	?	-	-	+	
15	Encourage innovation, improve productivity, regenerate towns and villages creating a business environment in which new businesses start and existing businesses grow	-	-	0	+	
16	Improve skills and incomes of the lowest paid and provide satisfying work opportunities for all so that people can realise their full potential	+	0	+	+	

Key to Appraisal Results		
Strong positive impact	++	<u>Notes</u> * Derived from 2015 Sustainability Appraisal of Changes to the Submission NDLP1  ** Derived from North Dorset Core Strategy & Development Management DPD Initial Sustainability Appraisal Report (March 2010) – the alternative was referred to as 'Option 15(1)b Extension to the North East' but did not include land north of the bypass
Positive impact	+	
Neutral or no impact	0	
Negative impact	-	
Strong negative impact	-	
Unknown or uncertain impact	?	