

Independent Examination of the North Dorset Local Plan (Part 1)
Statement by Clemdell Limited (ID No: 1191)

Hearing Session: ISSUE 7

1.0 INTRODUCTION

1.1 Clemdell's Objections and Submissions focus upon the Primary Shopping Area of Blandford Forum's Town Centre. The topic is split across a range of Questions for examination and thus may be referenced under other Issues. The topic inevitably considers NDDC proposals affecting the Local Plan as a whole.

2.0 THE BROAD LOCATIONS FOR DEVELOPMENT

2.1 I/INT/3(SUD015) adds clarity to NDDC's position on the limitation of LP1 stating "*The two-part approach will see a strategic policy framework put in place in advance of specific sites being allocated*" and that the Plan at this Examination "*identifies only broad locations for development in Part 1*"

2.2 As considered at Issue 4, the SHLAA will perhaps be some seven years out-of-date when the work is undertaken to consider site allocations. Compilation started in 2009 in a different planning and economic environment. The focus when considering the broad location of Land to the South-East of Blandford St Mary has been on one particular site known as St Mary's Hill.

2.3 When the Focussed Changes relocated LP1's preferred site from the edge of the town centre to what the Supplement to the Sustainability Appraisal ("the Supplement") acknowledges (SUD008-3.20) to be a location severed from Blandford it did not re-assess the initial seven sites that could be identified as Land South-East of Blandford St Mary (A4). As is detailed at Issue 4, SHLAA sites directly adjoining or close to St Mary's Hill were rejected for reasons that would no longer apply if St Mary's Hill were accepted as a site specific location in LP2.

2.4 The sustainability of the broad location of Land to the South-East of Blandford St Mary must be considered comprehensively and not on the basis of land ownership.

Thus alternatives, even to the south-east of Blandford St Mary, have not been subject to assessment in the light of the proposed policy changes.

3.0 **ST MARY'S HILL**

- 3.1 The only site of those available to the south-east of Blandford St Mary that has had any assessment is known as St Mary's Hill. The Supplement is quite specific (at paragraph 1.7) about why the Council now supports St Mary's Hill "*further information has been submitted for the site to the south of the A350/A354 roundabout. This has been submitted as part of the pre-application process associated with a pending planning application. Analysis of this information has concluded that the impact of the site will be less than previously thought*". As the Council has clearly stated, its own work on site allocation has not commenced - but it has accepted the pre-emptive work on behalf of the owners of St Mary's Hill.
- 3.2 That information was submitted as part of a request for a Scoping Opinion (2/2014/0079/PLNG) for only part of the site (150 out of 300 units proposed) which states, contrary to the Supplement paragraph 1.7, that "*The development has the potential to cause a significant landscape and visual impact*" (A5) and this is supported by AONB concerns even on the lower half of St Mary's Hill (A6)
- 3.3 Paragraph 1.7 misled Natural England to that Focussed Change "*We also note that since initial assessment of the site south of the A350/A354 a subsequent and more detailed landscape appraisal has been undertaken that indicates that the development can be adequately incorporated into the landscape*" (ID_2784_Rep_5059)
- 3.4 Further, in consulting on the Scoping Opinion NDDC failed to request Natural England (the statutory consultee on this point) to advise upon the Grade 3a Land. This was picked up by AONB: "*I note that the applicant indicates that the agricultural land classification for the site falls into the category of the best and most versatile agricultural land. It would appear from paragraph 112 of the NPPF that the EIA should demonstrate the necessity of significant development on land of that quality. The AONB is concerned*" (A6)
- 3.5 NPPF112 was disregarded. The Focussed Changes Agenda Report (Agenda Report) stated: "*It should also be borne in mind that there are planning issues*

associated with the St Mary's Hill site, many of which have been identified through the sustainability appraisal process" (A15 paragraph 32). It does not identify the planning issues and disregards the statutory environmental issues.

- 3.6 By recognising the severance of St Mary's Hill (in the Supplement) the only way to give credibility to that site being attached to a settlement was by the key change (CON/16/1) in the Focussed Changes in introducing "other facilities" in the spatial strategy for Blandford and deleting the by-pass as a constraint. That should be compared to the reasons for deleting through the SHLAA site 0534, attached to St Mary's Hill.
- 3.7 Discussion with NDDC disclosed that "other facilities" include Tesco, emphasising the challenge to Blandford Town Centre viability from this broad location. The sustainability of CON/16/1 has not been appraised. Support for Tesco (disregarding the Town Centre) runs through A15.
- 3.8 Sustainability assessments must be based upon a balance between alternatives applying criteria set out in guidance and statute. The Agenda Report recognises this (A15 paragraph 20) it is quite open in stating this balance has not been attempted stating "*Consequently, the proposal to delete the Crown Meadows site from the Local Plan Part 1 is based on heritage issues and not on other issues.*" (A15 paragraph 31) which, inter alia, fails to consider English Heritage draft Note 3: The Setting of Heritage Assets (Step 3) (A17).

4.0 **ECONOMIC DEVELOPMENT SITES**

- 4.1 As considered in Issue 3, Blandford Town Centre is the main employment hub for Blandford Forum. There has been no sustainability assessment for sites in the Town Centre. The consideration of these sites is, prima facie, a matter for Part 2 of the Local Plan. However land rear of Market Place, including what is currently Morrisons, is a key location for regeneration and for the broad brush support that is the function of LP1.
- 4.2 The sites specified in Policy 3 are, because the Plan reaches back to 2011, now somewhat historical. The Tesco site is now for sale. A most interesting point is that site (k), land off Shaftesbury Lane, appears to be the same specified in Policy 11 as (g) Land off Shaftesbury Lane, Blandford Forum (4.8 hectares). Such decimal

specificity in a Plan with the stated objective of identifying only “broad locations” is incompatible with Part 2.

4.3 There is no discussion in LP1 about the economic implications of the Tesco and Asda Permissions (LP1 e.g. paragraph 8.27) as is found in the MWA Reports (SED016) or, as to employment land, in the Agenda Reports on those applications (e.g. A7).

5.0 **INFRASTRUCTURE**

5.1 The infrastructure proposals are aspirational. They need to be related to the commitment of the enabling agencies to fund them in order to be realistic (per NPPF154).

5.2 NDDC has an SPG (COD036) for this subject. This should be reviewed to incorporate as much of the supporting text in LP1 as necessary – responding to Question 1.14.

5.3 In so far as NDDC believe any of the Infrastructure should be the subject of developer tariffs, the effect of the Ministerial Statement (MHN020) needs to be considered.

6.0 **TOWN STRATEGY**

6.1 Paragraph 8.12 is somewhat out of date in referencing the early part of the Plan period.

6.2 There is little or no vision and no encouragement for the Town Centre, as is considered in Issue 3. There is a complete lack of reference to the contribution from Town Centre regeneration and brownfield sites This reflects the 'Town Centre Last' feel that runs through the whole Plan - albeit recognising the limited “encouragement” in SUD015/6/12/2 which does not sit well with paragraph 8.12.

7.0 DISCUSSION

- 7.1 LP1 is specifically non-site specific. Any debate as to the sustainability of the broad locations for development should not focus on specific sites or specific ownership. That is a matter for Part 2 of the Local Plan.
- 7.2 The Supplement and the current iteration of LP1 appears to have focussed on a very specific site at St Mary's Hill and not on the seven known sites that should be re-examined as being land to the south-east of Blandford St Mary. (A4) In order for the consequences (e.g. for self-containment) to be assessed the seven sites (or at least those in the Parish) must be assessed comprehensively for the effect of ribbon-development upon the comprehensive relationship to, and effect upon, Blandford.
- 7.3 Assessment of St Mary's Hill appears to have been limited to only part of the site and co-operation with e.g. English Nature seems to be lacking. For example they were not asked to comment on the site being Grade 3A land and have been misled by the difference between the Supplement and the actual Scoping Opinion.
- 7.4 St Mary's Hill only came into LP1 because NDDC failed to attempt the essential, albeit difficult, balance between the three elements of sustainability. As is considered in Issue 3, an English Heritage study identified at Thornbury that it was the Examination Inspector who *grasped* this challenge and English Heritage accepted the outcome of supporting the Town Centre "*at the expense of heritage to secure urban development for wider benefits.*" The benefits included "*The need to sustain and enhance its facilities and services in the face of competition from other retail outlets,* (A16paragraph 3.42). This balance must be grasped at this Examination.
- 7.5 Equally there is site-specificity in the economic development sites. Where sites have moved on and the Plan has not, that is not a concern, but identifying sites to a decimal point in LP1 is premature. There is no consideration of economic development within the Town Centre or reaction to the MWA Reports on the identified current threats to Morrisons that anchors the Town Centre (this is considered in Issue 3).
- 7.6 NDDC has an SPG that considers infrastructure and its delivery. This should be updated rather than duplicated in LP1.

7.7 In order to move towards soundness Chapter 8 and Policy 16 should be amended in accordance with Clemdell's previous submissions and, inter alia, as follows:

- CON/16/1 should be deleted
- Paragraph 8.12 should read "*The strategy for the town will see the encouragement of regeneration throughout the Plan period. Development contributing to the regeneration of the Town Centre with retail employment and residential uses will be positively supported to ensure a vibrant and vital hub for the surrounding catchment. The building out of sites already allocated for development or with planning permission will continue in the early part of the Plan period, with additional greenfield sites 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.*"
- Figure 8.1 should show the broad location for regeneration as including land to the south of Market Place including Morrisons site
- delete paragraphs 8.34, 8.35 and 8.36. Replace paragraph 8.34 with "*The Council commissioned MWA to report on retail issues in Blandford. MWA produced a series of reports between 2011 and 2013 identifying the current and projected trading conditions for retailers in the town. The conclusions have informed the Council's commitment to pro-actively support regeneration within the Town Centre and apply a sequential test to out-of-town or edge-of-town proposals for main town-centre uses (including residential).*"
- add to the end of paragraph 8.37 *This edge-of centre site would be required to demonstrate that any proposed use will not adversely affect the vitality and viability of the Primary Shopping Area*
- and in paragraph 8.38 add: "*There may be some limited is potential to extend existing retail outlets and other Town Centre uses in this location and for the Council to apply the principles of NPPF40 to review its parking charges for the Marsh & Ham Car Park it manages under a legal agreement, in order to encourage Town Centre shoppers. This area is already protected by a flood defence scheme but in addition to the flooding issues, any regeneration scheme here would also have to have regard to the balance between supporting the vitality and viability of the Town Centre and any –the potential impact on the historic character and visual context of the town centre.*"
- delete paragraphs 8.41 to 8.49 (to be relocated into SPD as necessary)

- **Policy 16** amended:

Sustainable Development Strategy

Blandford will maintain its role as the main service centre in the south of the district through::

a development and redevelopment within the existing built-up area; and

a1 regeneration of the Town Centre

b extensions, primarily of housing in the broad locations either to the west of Blandford Forum or to the west of Blandford St Mary or to the south east of Blandford St Mary to be determined through the Local Plan – Part 2 and

c employment uses on land within the bypass on the northern edge of the town and the mixed use regeneration of the Brewery site close to the town centre.

Growth will be taken forward in ways which respect the town's environmental constraints, support its role, function and identity, and contribute to making it more self-contained and vibrant. Blandford's distinctive natural and historic character will be retained and enhanced.

Environment and Climate Change

[No Change]

Meeting Housing Needs

About []-4,100 homes will be provided at Blandford Forum and Blandford St Mary during the period 2016 – 2031 ~~26~~.

In addition to infilling and redevelopment within the settlement boundary, Blandford's housing needs will be met through:

g mixed use regeneration of the Brewery site; and

g1 mixed use regeneration in the Town Centre and

h the development of land to the west of Blandford Forum or the development of land to the south east of Blandford St Mary; and

i the development of land to the west of Blandford St Mary.

Supporting Economic Development

Employment needs in the town for the period up 2026 will be met through:

j the mixed use regeneration of the Brewery site; and
j1 mixed use regeneration in the Town Centre and
k the development of land in the broad location of ~~off~~ Shaftesbury Lane; and
l the development of vacant sites on existing industrial estates; and
m the retention of existing employment sites.

In the period up to 2026, additional retail floorspace ~~will~~ may be provided through:
n the extension of the existing Tesco supermarket at Stour Park; and
o the provision of a new supermarket off Shaftesbury Lane.

The main focus for the encouragement of town centre regeneration, which may include additional retail floorspace, will be land to the south of Market Place and East Street within the Primary Shopping Area, including land around the existing Morrisons Co-op store. ~~The extension of existing retail units south of Market Place and East Street may also be permitted.~~

Infrastructure

In the period up to 2031 ~~2026~~, grey infrastructure to support growth will include:
p the provision and enhancement of walking and cycling links within Blandford between residential areas and key destinations, such as the town centre, employment sites, schools and other community facilities; and
q the provision and enhancement of public transport, cycling and walking links between Blandford and nearby villages (and Blandford Camp); and
r the improvement and extension of the North Dorset Trailway along, or close to, the route of the former Somerset and Dorset railway line for cycling and walking; and
rs the identification of a safeguarded route for the Spetisbury and Charlton Marshall Bypass ~~as part of the development of the land south east of Blandford St Mary.~~

In the period up to 2031 ~~26~~, social infrastructure to support growth will include:

st the refurbishment of the Corn Exchange to form the main community venue for the town and the provision of neighbourhood halls to serve new development in the northern part of the town and Blandford St Mary; and

tu the retention of Blandford Leisure Centre in community use and the upgrading of its facilities; and

uv the extension of the Archbishop Wake and Milldown primary schools; and

vw a new doctors' surgery or the expansion or relocation of existing doctors' surgeries.

A network of green infrastructure will be developed in and around Blandford, focussing on linking existing sites (such as the Milldown and Stour Meadows) and providing new sites and links with the town centre to serve the residents of both the new and existing developments in the town. New or improved facilities will include:

w informal open space at Crown Meadows associated with housing development to the west of Blandford Forum; and

x new sports pitches and associated facilities on land within the built up area of Blandford.