

Dorset Council's Response to Matters raised by the Examiner as part of the Agenda for the Blandford + Neighbourhood Plan 2011 – 2033 Hearing

Matter 4.1

'Policies B2 and B3c. I will invite Dorset Council (DC) to begin by outlining the reasons for supporting Blandford + Neighbourhood Plan (B+NP) and the circumstances that have changed since the previous Examination. It would be helpful if DC provides me with a copy of this statement (copied to other participants) by Friday 8 November at the latest. This will be followed by a discussion that I will lead, which will reflect on what was seen on the site visit tour of viewpoints in the morning and what conclusions might be drawn, together with considerations that I set out in my Discussion Notes below.'

Dorset Council's Response

1. There are a number of reasons why Dorset Council (DC) supports Policies B2 and B3c in the neighbourhood plan. These reasons, which relate to circumstances that have changed since the Examination of version 1 of the NP (NPv1), are set out below. A number of the reasons outlined below have previously been referred to by DC in previous submissions made by the Council in relation to the neighbourhood plan including in response to the Examiner's Question EQ1¹.

North Dorset Local Plan Review/Dorset Council Local Plan

2. Paragraph 1.10 of the North Dorset Local Plan Part 1 (LPP1) sets out that North Dorset District Council (NDDC) will commence a review of the plan by the end of March 2016 with the aim of adopting the Plan by the end of November 2018. Although NDDC did consult on an Issues and Options Document as part of the Local Plan Review, for a number of different reasons, the review did not progress as quickly as anticipated prior to NDDC being dissolved on the 31 March 2019. DC, which came into existence on the 1 April 2019, has now taken the decision² to cease work on the North Dorset Local Plan Review with the work that has been done to date feeding into the production of the Dorset Council Local Plan which will cover the North Dorset area. A Local Development Scheme³ has been adopted by DC which sets out a

¹ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/examination/blandford-np-examiners-question-eq1-dc-qb-joint-response-final-and-appendix-170619.pdf>

² Please see item 18 available via the following link:

<https://moderngov.dorsetcouncil.gov.uk/ieListDocuments.aspx?CId=152&MId=220&Ver=4>

³ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/dorset-council-planning-policy/pdfs/dorset-council-lds-250619.pdf>

timetable for the production of the Dorset Council Local Plan. It details that the Council currently intends to adopt the local plan in 2023. Consequently, it will be sometime before a new set of planning policies covering the neighbourhood plan area are produced and adopted by DC.

3. As set out in the Councils' response to Examiner's Question EQ1 the fact that NDDC didn't adopt its Local Plan Review by the end of November 2018 and the fact that there isn't currently a five-year housing land supply in respect of North Dorset (please see below) leaves the neighbourhood plan area vulnerable to speculative planning applications. Furthermore, given the potential that there may not be a five-year housing land supply for the foreseeable future means that this vulnerability could be sustained for a long period of time. This would be contrary to the Government's aim, as set out in paragraph 15 of the NPPF, of having a genuinely plan-led system.
4. Therefore, whilst only time limited, DC considers that the making of the neighbourhood plan, including the policies that allocate land for development, could, subject to criteria in paragraph 14 of the NPPF being met, provide the neighbourhood plan area with some additional protection against speculative planning applications for development that are not in accordance with the adopted development plan for the area. For these reasons DC supports the plan, especially given the context of the delays associated with the North Dorset Local Plan Review and the fact that DC does not intend on adopting a new Dorset Council Local Plan until 2023.

Spatial Strategy for Development in the North Dorset Area

5. The work undertaken in relation to the North Dorset Local Plan Review continued to identify Blandford as one of the four main towns in the North Dorset area that should be the main focus for growth, both for the vast majority of housing and other development. Whilst still at an early stage, initial work that has been undertaken in respect of the Dorset Council Local Plan indicates that Blandford will continue to have a prominent place in the settlement hierarchy that is defined for the Dorset Council Local Plan. Consequently, Blandford is highly likely to continue to be a focus for growth in the North Dorset area. This is especially the case given it is one of the main service centres in North Dorset and serves a sizeable rural hinterland that contains a large number of villages.
6. Given the need for new development in the North Dorset area, including specifically at Blandford (please see below), DC considers that a spatial strategy which proposed no growth at Blandford is not a

realistic option. In the North Dorset Issues and Options Document⁴, which was subject to a thorough Sustainability Appraisal⁵, the land that is allocated for development in Policies B2 and B3c of the neighbourhood plan was identified as having possible development potential. The neighbourhood plan took NDDC's Issues and Options work forward by refining the options based on the updated evidence base.

Housing Need

7. There is evidence of increased housing need in the North Dorset area since the LPP1 was examined. This evidence of increased need is set out in the 2015 Eastern Dorset Strategic Housing Market Assessment (SHMA)⁶ and is also identified by using the standard methodology that the Government has introduced for assessing housing need.
8. The current housing requirement for the North Dorset area, as set out in the LPP1, is 285 dwellings per annum. The SHMA sets out a need for 330 dwellings per annum in North Dorset whilst the current need based on the Government's standard methodology is 355 dwellings per annum. With regards to affordable housing needs there are approximately 5,700 households on the housing register for the DC area. In terms of the North Dorset area there are approximately 1000 households on the housing register, 355 of these households have a connection to the area covered by the neighbourhood plan.
9. The evidence of increased housing need, as set out in the SHMA, is one of the main reasons that the Inspector who examined the LPP1 required NDDC to carry out an immediate review of the plan. As referred to above the review of the plan was not completed within the timescales intended and work on the review has now ceased with work that has been done to date feeding into the new Dorset Council Local Plan which is currently due to be adopted in 2023. DC considers that Policy B2 in the neighbourhood plan will help meet some of the increased need for housing which has been identified in the North Dorset area since the LPP1 was adopted.

Housing Land Supply

10. DC is currently unable to demonstrate a five-year supply of deliverable housing sites for the North Dorset area. Analysis of housing monitoring data for the 2018/19 monitoring period indicates that the lack of a five

⁴ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/local-plan-review/pdfs/north-dorset-local-plan-review/issues-and-options-consultation-document.pdf>

⁵ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/local-plan-review/pdfs/north-dorset-local-plan-review/issues-and-options-sustainability-appraisal.pdf>

⁶ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/joint-planning-policy-work/shma/2015-update-and-review-of-the-strategic-housing-market-assessment.aspx>

year housing land supply is likely to persist in North Dorset for the foreseeable future. This is a significant change in circumstances since the Examination of NPv1. DC considers that the proposed allocation set out in Policy B2 of the neighbourhood plan will help improve the housing land supply situation in the North Dorset area.

Need for a new Primary School at Blandford

11. DC considers that the need for a new primary school at Blandford, which is referred to as a potential way of meeting the need for additional primary school places at Blandford in criterion v of Policy 16 (Blandford) in LPP1, is more time-critical than when NPv1 was subject to Examination. Furthermore, DC considers that further work that has been carried out in terms of considering the potential of expanding the existing primary schools at Blandford confirms that such expansion is not an option. The only option for increasing primary school capacity at Blandford is by developing a new primary school. Therefore, the only way that part v of Policy 16 in LPP1 can be met is by providing a new school.
12. DC considers that the area of land proposed for the new school (to the north of the bypass and in vicinity of the A350 pedestrian bridge (yellow bridge)) is the most appropriate location for a new primary school at Blandford. The most up to date position regarding school provision at Blandford, including evidence regarding the need for a new primary school, is set out in the 'Blandford Town Pupil Place Planning Statement' (updated June 2019)⁷.

Need for Employment Land

13. LPP1 sets out that there is sufficient employment land allocated in North Dorset to meet identified needs in the plan area up to 2031. In terms of the North Dorset Local Plan Review, Chapter 4 of the Local Plan Review Issues and Options Document details that an updated Bournemouth, Dorset and Poole Workspace Strategy was published in October 2016. The strategy, which covers the period 2013 to 2033 and considers employment needs and supply for Western Dorset, Eastern Dorset (which North Dorset falls within) and Dorset as a whole, demonstrates that the amount of employment land that is available in Eastern Dorset, and across the whole of Dorset, exceeds the employment land need requirements up to 2033.
14. Nevertheless, paragraph 4.9 of the Issues and Options Document details how NDDC considered it important that the specific need for

⁷ <https://www.dorsetcouncil.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/pdfs/blandford-v2/submission-documents/appendices/blandford-pupil-place-planning-statement-update-11.06.19-final.pdf>

employment land in North Dorset continued to be met over the plan period especially at the four main towns in North Dorset including Blandford. The latest published Annual Monitoring Report⁸ for North Dorset details that in April 2018 there was 28.85 hectares of land available for employment use at the four main towns but only 4.16 hectares of this land was available at Blandford. Given the limited amount of employment land available at Blandford, the fact that the 4.16 hectares of land consists of a number of smaller parcels of land rather than being one site, therefore reducing its attractiveness to potential future occupiers, and other factors including views expressed by colleagues in the Council's Economic Development Team and in the responses to the North Dorset Local Plan Review Issues and Options Consultation DC supports the proposal to allocate additional land for employment uses in Policy B3c of the neighbourhood plan.

Sustainability Appraisal and Evidence to support Policies B2 and B3c

15. With regards to NPv1 NDDC expressed significant concerns, which the Examiner agreed with, regarding the Sustainability Appraisal (SA) of the plan, including its consideration of reasonable alternatives and cumulative impacts, and the evidence base to support the proposed allocations in the plan. DC is satisfied that the concerns previously raised in relation to the SA and the evidence base have been addressed in respect of NPv2. A new SA has been produced that is comprehensive in its approach including in terms of considering the cumulative impacts of development and reasonable alternatives. Further to the SA, DC considers that the evidence to support the allocations in Policies B2 and B3c, including in terms of considering the landscape impacts of developing the proposed allocations, is far more detailed and comprehensive than the evidence that supported NPv1.

Matter 4.5

'On behalf of Wates Developments Limited, which has land interests north of Black Lane, Genesis Town Planning contend that this land should have been included in the consultation process and that the site represents an opportunity to boost the supply of housing in the area. I wish to hear the reaction of DC and the B+ Qualifying Body to this representation. It appears that the site was not put forward in the 'call for sites' and has not been considered in the Site Selection Background Paper, updated January 2019, or in the Sustainability Appraisal. Nor has it been considered in the consultation process for the Plan. In the absence of such inclusion I am unclear about the scope for considering the site at this stage.'

⁸ Annual Monitoring Report 2018

Dorset Council's Response

16. DC agrees with the comments made by the Qualifying Body in its statement.