

Mr S Carnaby
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11th July 2023

Dear Steve,

Blandford + Neighbourhood Plan Review – Examiner procedural letter and questions

Many thanks for forwarding the examiner's procedural letter and questions regarding the Blandford + Neighbourhood Plan modification review.

In response to Mr Hogger's questions the Blandford + monitoring group can confirm: -

Q1. Cranborne Chase AONB¹ Partnership raise a number of issues in its submission, including in relation to light pollution (paragraph 21); lack of engagement (paragraph 33); and lack of compliance with national guidance (paragraph 23). Can both DC and the QB provide a brief joint response addressing the concerns raised by the AONB Partnership?

Q1. QB response:

a) Code 8 of the Blandford + Design Code on page 68 of the Modified Plan and the corresponding Policy B10 'Blandford + Design Code' addresses Dark Skies and it is considered that the Qualifying Body has had full regard to the matter.

b) It is considered that the Qualifying Body has fulfilled its legal obligation to consult relevant stakeholders provided by Section 15 (2) of part 5 of the 2012 Neighbourhood Planning Regulations and has extensively engaged the community as set out in the Consultation Statement submitted alongside the Modified Plan. Additionally, as set out in paragraph 3.19 – 3.21 of the Modified Plan, this review of the Made Plan is intended to be followed by a fuller review of the Neighbourhood Plan in due course. The Qualifying Body and Dorset Council also intend to continue to work in partnership throughout the preparation of the emerging Dorset Council Local Plan.

The AONB were emailed directly on the 9th December 2022 to advise them of the Regulation 14 consultation and, although they replied after the consultation deadline of the 30th January 2023, their response was still included in the consultation statement.

c) No evidence has yet come forward to show that the site is not deliverable, and the site is subject to a live planning application. Policy B2 which allocates land for development is a retained policy and has already been subjected to a successful examination and

¹ Area of Outstanding Natural Beauty (AONB)

referendum where Dorset Council and an independent examiner determined that the policy meets the basic conditions. Should additional evidence come to light on the deliverability of the site, the matter will be revisited as part of a fuller review of the Neighbourhood Plan and/or the preparation of the emerging Dorset Council Local Plan.

Q2. Wates Development suggest that the Review of the Plan should be delayed until there is greater clarity regarding national policy and the emerging Dorset Council Local Plan (under section 4: Conclusion). Can both DC and the QB provide a brief joint response addressing this issue?

Q2 Response:

This concern was addressed in the Regulation 14 Analysis which can be found in Appendix 11 (Page 23, point 4) of the Consultation Statement. Paragraph 3.19 – 3.21 in the Modified Plan explains that the B+ Monitoring Group and Dorset Council agreed to undertake a modification of the Made Plan now, in light of the early stages of the emerging Local Plan preparations, followed by a fuller review in due course.

The Regulation 14 Analysis states: ‘The Councils are aware that the Levelling Up and Regeneration Bill (LURB) will make provisions that will affect neighbourhood planning, but it is not considered necessary to delay this modification project. The Councils can respond appropriately to any amendments to the planning system in due course whilst benefiting from the provisions of §14 of the NPPF, the principle of which is to be retained in the proposed revised NPPF.’

Also, it should be noted that there is nothing in legislation, national planning policy or guidance that requires a neighbourhood plan to be delayed awaiting national policy or local plan policy changes.

Q3. DC makes a number of suggested changes to the Neighbourhood Plan in its Regulation 16 response. Could the QB comment on those suggestions?

Q3 Response:

‘With regards to the parks and gardens around Bryanston School, which includes the Crown Meadows, the Council notes that the land appears to have been identified on the Local Heritage Assets Map and has been given the number 77. This follows comments made by DC at the regulation 14 consultation stage. However, the land is not listed under Policy B11 and it does not appear as though it is identified on Policies Map – Inset B (Page 57). The land needs to be added to the list under Policy 11 and identified on Policies Map – Inset B (Page 57). Furthermore, it appears that the identification of the parks and gardens, including their significance, by the Dorset Gardens Trust has not been referenced as additional text in Policy B12 as suggested by DC at the regulation 14 consultation stage.’

In relation to Dorset Council’s point about the parks and gardens around Bryanston School, which is recited above for clarity, the Qualifying Body would like to bring to the examiner’s attention that the Local Heritage Assets Map (February 2023), which includes the parks and gardens around Bryanston School as Local Heritage Asset 77, has been incorrectly submitted alongside the other documents. The Qualifying Body considered Dorset Council’s representation regarding the addition of the Local Heritage Asset submitted during the Regulation 14 consultation but determined that it would not be

appropriate to add a new Local Heritage Asset at such a late stage in the preparation of the Modified Plan. As such, the Qualifying Body is pursuing this matter with DC separately and the proposed identification will be taken forward at a later stage, either through a fuller review of the Neighbourhood Plan or the emerging Dorset Local Plan. The Qualifying Body is aware that the opportunity to assess the value of such assets is not lost. Should any planning applications be submitted which affect the heritage value of this site as a non-designated heritage asset, the Qualifying Body will make appropriate representations to the application.

The QB would like to propose to the Examiner that the map be removed from the final modification plan as it was added in error.

'DC considers that a number of the maps in the modified plan would benefit from their clarity being improved and/or some minor editing. For example, it would be beneficial to enhance the clarity of the policies maps on pages 56 and 57. The Council proposes to work with the Qualifying Body regarding finalising the maps following the conclusion of the examination.'

The Qualifying Body accepts that the quality of the maps is lower than expected. Maps within the Modified Plan document needed to be compressed in order to achieve an acceptable file size of the Modified Plan document. The maps have also been published separately as higher quality images to try to address this issue. Regarding Dorset Council's remaining suggestions, including changing the wording of Policy B11 (Local Heritage Assets) , the Qualifying Body agrees that these are helpful and aid clarity. To that end the Qualifying Body would be happy to accept these modifications.

Q4. Could the QB comment on the issues set out in the submission from the Environment Agency?

Q4 Response:

The Environment Agency did not submit a representation at the Regulation 14 consultation and makes no comments on the Modified Plan in their representation at Regulation 16. Nonetheless the Qualifying Body consider that the Modified Plan through its Policies B8 'Green Infrastructure Network' and B10 'Blandford + Design Code' contains provisions to encourage proposals to respond to the opportunity to deliver multifunctional benefit through linking development with enhancements to the environment. The Qualifying Body would also like to reiterate that this modification of the Made Plan is intended to be followed by a fuller review as set out in paragraphs 3.19 – 3.21 of the Modified Plan.

Q5. David Locke Associates have submitted comments in relation to Policy B.10, regarding the Blandford + Design Code. Could the QB respond to the main issues that are addressed; namely: - Conflict and Misalignment; - Duplication; and - Consistency?

Q5 Response:

*'1) Conflict and misalignment with the Neighbourhood Plan strategy
To ensure the Design Guidance and Codes document accurately reflects the Neighbourhood Plan strategy, it is proposed that the extent of Character Areas CA7. Blandford St Mary Residential is amended to incorporate our client's site which is subject to the live OPA. This is to ensure consistency with the outputs of the Neighbourhood Plan's very own Site Selection Paper (January 2019) and the Blandford settlement*

boundary. 4 The character of the OPA site reflects a more urban setting following the commencement of development in the St Mary's Hill site to the north west. The St Mary's Hill site quite rightly has been incorporated into CA7. Blandford St Mary Residential, and the OPA site should also be incorporated into this Character Area. The change would have the minor effect of amending Figure 159 of the Design Guidance and Codes document. The character areas as currently shown, CA9. Countryside of Blandford St Mary, gives the appearance of a land-use designation which does not accurately reflect the position regarding the principle of development within the settlement boundaries articulated in Policy B1 and the settlement boundary as shown on Policies Map inset A. The land subject to the current OPA is within the settlement boundary of the Neighbourhood Plan and therefore the principle of development is firmly established. This point was endorsed by Dorset Council Planning Policy through the consultation on our clients OPA. Inset Map B should be wholly consistent with the current approved version, and not undermine nor contradict to the principle of development already established for land within the settlement boundary. We therefore consider that land north of Ward's Drove must be reflected within Character Area CA7'.

The definition of Character Areas for the purposes of the application of the Design Code is not intended to reflect the development boundary established at Policy B1 of the Modified Plan. The Character Areas within the Design Code have been defined based on the existing built-up areas of the Neighbourhood Area, as set out in the National Model Design Guide and Code and is subject to change as new developments are built out.

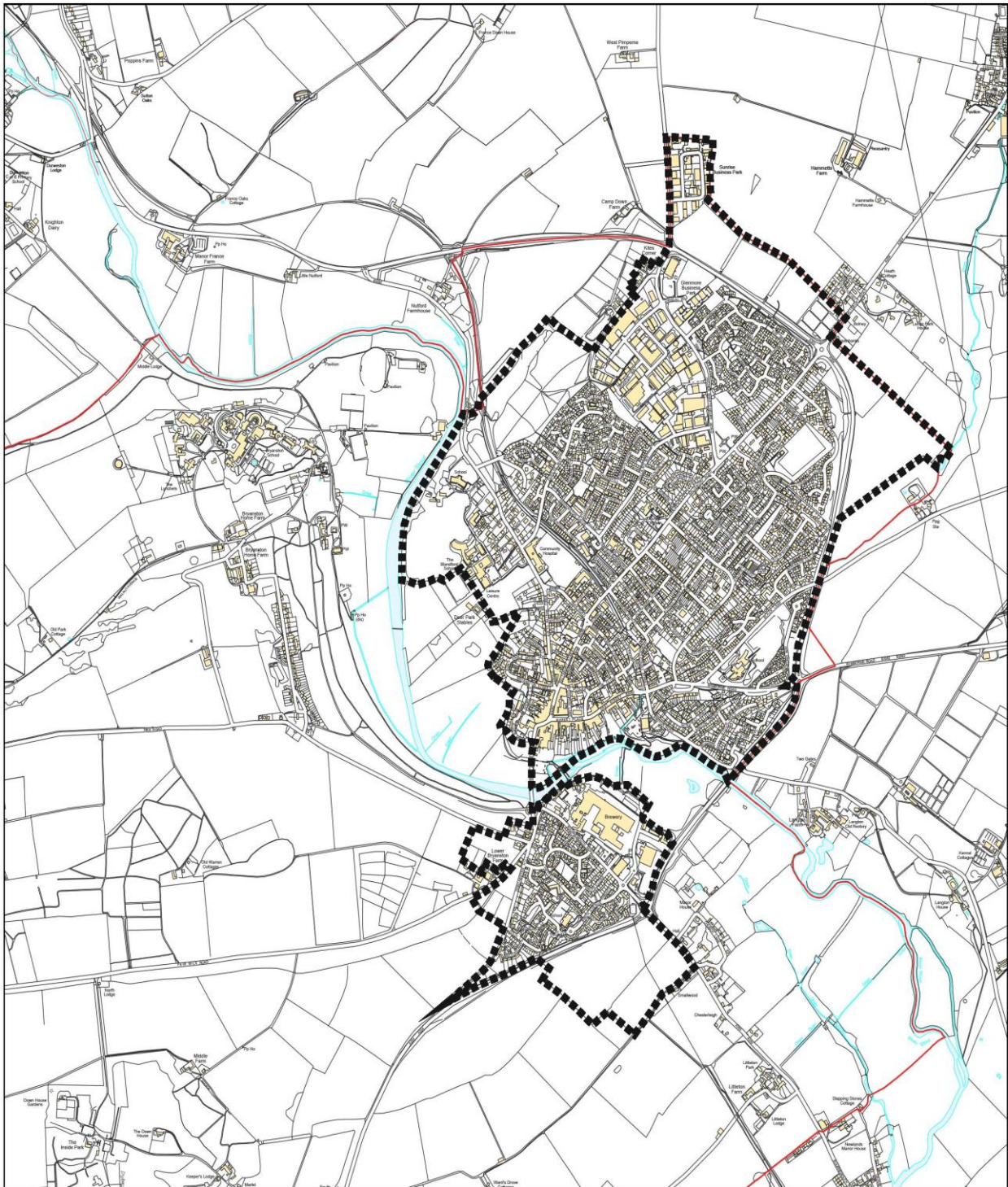
'2) Duplication HLM do not consider it necessary to identify Character Areas on the Inset Map B (Policies Map).

The role of the character areas are to support and guide development proposals which are identified adequately in the Design Guidance and Codes document. Policy B10 in the Blandford+ Neighbourhood Plan Review refers to the Guidance and Notes document which covers the whole Neighbourhood Plan area, therefore there is no need to duplicate this information on Inset Map B which relates to specific Policies.'


The Policy Map purposefully includes Character Areas to ensure that it is clear how Policy B10, including the Design Code content, applies within the Neighbourhood Area. As an edge of settlement development, it will be an important starting point for any proposed development to reflect the area type within which the site sits, its surroundings and the features of the site as per the National Model Design Guide and Code.

'3) Consistency HLM also consider that for the avoidance of doubt, Inset Map B is zoomed out to ensure the full extent of the settlement boundary is visible and consistent with the previous version. The settlement boundary for Blandford Forum & Blandford St Mary is identified in Policy B1. Given Inset Map B relates to Neighbourhood Plan Policies the full extent of Policy B1 should be shown'

The stand-alone Policies Map has been prepared in accordance with standard practice. However, in the interest of clarity, the Qualifying Body is happy to agree to modification and offers the following suggestion: Insert Plan E below in the supporting text of Policy B1.



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 B1 Settlement Boundary

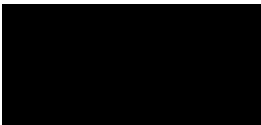
Q6. In its Regulation 16 submission, Pimperne Parish Council identify several matters of concern. Could the QB briefly address the issues raised?

Q6 Response:


Pimperne Parish Council did not submit a representation at the Regulation 14 consultation and raises several matters in its representation to the Regulation 16 consultation. Some of the matters raised have been addressed in responding to the examiner's questions above. Blandford + Policy B2 was discussed extensively during the preparation of the Made Plan, including during a public hearing, and an independent examiner and Dorset Council were satisfied that the policy met the basic conditions, and it was subject to a successful referendum. There is also a live planning application relating to the allocation in Policy B2. The Qualifying Body does not consider that there is any evidence to suggest that any additional modifications are required to be made to Policy B2 at this stage. The provisions of the Pimperne Neighbourhood Plan and the Modified Blandford + Neighbourhood Plan will continue to apply to their respective designated neighbourhood areas.

If you have any queries, please do not hesitate to contact me.

Yours sincerely,



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Blandford Forum Town Council

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