



NORTH DORSET CPRE: COMMENTS ON NORTHERN DORSET FUNCTIONAL AREA AND BLANDFORD

SUMMARY

The response from the North Dorset Group of CPRE covers specific comments on the Northern Dorset Functional Area, primarily Gillingham, Stalbridge and Shaftesbury, as well as Blandford, which has been included in the South East Dorset Functional Area. We see no reason why Blandford has been taken out of North Dorset and will make our case later.

We are also attaching a Dorset-wide response prepared by Jo Witherden, Dorset Planning Consultant, which summarises the basis for Dorset CPRE's objections to the draft Dorset Council Local Plan. It includes suggestions for key changes and actions that we believe Dorset Council should consider, in order to produce a truly sustainable and inspiring Local Plan that has the community's interests and the environment at its heart.

1. GILLINGHAM

Vol 2 - 29.5/GILL2 GILLINGHAM SOUTHERN EXTENSION

The proposal for 1,800 homes at the GSE is supposedly to be delivered by **Taylor Wimpey** (210) **CG Fry** (634) and **Welbeck Land**. The consortium members CG Fry and Taylor Wimpey are in negotiation and will likely go ahead, but Welbeck Land are not committed. This leaves a current deficit of 961 houses. If Welbeck do not proceed, there are concerns that development may be imposed on other areas of Gillingham.

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For example, the Option of 600 houses at **Peacemarsh** has been added - in case Welbeck Land do not take up their options on GSE? Despite LEP funded improvements through the town centre, @ £3.5 million, and a Homes England loan @ £6.3million to build out Principle Street to encourage development, this non take-up remains a risk. Peacemarsh may be more attractive to developers than the GSE site, but is an unsuitable location, with no provision to improve access to the north of Gillingham to facilitate this development. There is strong local opposition to this site.

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The 70 homes that have been added in at **Common Mead Lane** are included in the Plan to fill a short-term housing need ie because GSE is so far behind its original delivery dates and the site is attractive to developers, and will build out fast. However, now that the GSE wagon is rolling there is no short-term housing need so this development cannot be justified. There is strong local opposition to this site.

Neighbourhood Plans must be respected and the Gillingham NP does not include either of these sites.

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Despite mention of the advantage of a railway station in Gillingham, there is no mention of increasing **car parking capacity** – which will be vital once new houses are built out. Out-commuting is significantly high in Gillingham.

Vol 2 - App 4. GT/GILL/002

The inclusion of Plant World, Milton on Stour, as a possible Gypsy and Traveller Site originates in the old NDDC Plan. The garden centre is now a thriving business and it is unlikely that (a) the owner would accept a Traveller Site and (b) that Dorset Council would afford to buy the site at market value

2. SILTON WIND DEVELOPMENT

Vol 1 - 6.9 Fig 6.5

The Wind development opportunities map shows a site at Manor Farm, Silton, which is identified as a “low ecological risk area” for wind development. This same site was the subject of a campaign entitled “Save our Silton”, fought and won against Ecotricity, and supported by North Dorset District Council. This site now supports a large solar array – it seems odd that it be identified now as a potential “wind development opportunity site”.

3. STALBRIDGE

Vol 2 - 32.4.1 Stalbridge Housing Allocation

It is proposed that Stalbridge can support 610 new houses, despite being in a Conservation Area and with many listed buildings. This will double the size of the town. The town centre has a building restricted crossing with the A357, recognized by Highways as having “potential road safety concerns”. This is the main route for HGVs and large agricultural vehicles from the A303/Wincanton to the north, down through one narrow main street to Blandford etc. There is scant local employment, no doctor, few shops or amenities, no public transport and no secondary school. The “fragility” of the retail offering, and limited opportunities to improve it are recognized in the Plan. Stalbridge is not a sustainable location for so many new houses.

Vol 1 - Environment and Climate Change 3.6.32 re Stalbridge

It is stated that “Dorset Council will avoid adverse impacts on, or loss of, buildings, significant spaces, views and any elements which make a positive contribution to the character and appearance of a Conservation Area”. Further, that through the Local Plan Dorset Council will ensure, as far as possible, that developments are located in sustainable locations, where key services are nearby and the need to travel by car is reduced. Neither of these statements have been followed in allocating 610 homes in Stalbridge.

3. SHAFTESBURY

30.1 Introduction

30.1.2. We welcome this statement that protects the slopes in a reasonably robust fashion echoing the Shaftesbury Neighbourhood Plan policies and former local plans.

Shaftesbury's slopes must be protected from development.

30.1.4 The plan seems to be endorsing the forthcoming Neighbourhood Plan but contains the worrying words are ‘but it does not include any allocations for additional development’. We should wish to make it clear that the town is at capacity having more than met its targets for housing in the recent past. There are at least 450 new dwellings in the pipeline which will more than bring the town to capacity in terms of infrastructure. Further development threatens the destruction of the town's unique environment on the edge of the Cranborne Chase AONB and its precious historical setting. It is the non-development of the 1800 houses at Gillingham that has left the area without a designated five-year land supply.

Shaftesbury should not be held accountable for this.

30.3 Development Strategy

30.3.2. Shaftesbury has contributed more than 900 dwellings in recent years with at least 450 more to come in the near future. Shaftesbury's infrastructure, ancient and special landscape and its historical context cannot absorb any further housing development. The climate change emergency, recognized by Dorset Council, requires that our green spaces must be preserved, and attention paid to more sustainable patterns of living. Less traffic, more walking and cycling and more local employment for those already in the area. Attention to air pollution as well as preserving the AONB's dark skies status must be paramount.

30.3.5. We welcome the Enmore Green link.

The Dorset Coast to M4 link exploration is important but does Brexit change anything as far as this major route is concerned? Is there likely to be less cross-channel traffic in future? The budget named Southampton as a free port. Will that take shipping from Poole and take traffic off the road links?

Local employment must be encouraged on environmental grounds and to build the green economy.

30.4 Town Centre Strategy

There is no mention of improved provision for parking in general in the town centre, to adjust for the loss of some parking because of pedestrianisation and the overall growth of the town's population. Safe places to leave bikes will be needed to encourage those who have started to exercise more during the lockdowns to leave their cars at home. Electric charging is also not mentioned and will be required almost immediately and certainly before 2030 when the rules on engines change.

30.4.4. Planning brief for former Co-op site on Bell Street – now sold – includes a convenience store which might suggest oversupply if the proposed Lidl store is finally built. The planning brief does not include a "garage" which is what the new owners are planning!

30.4.6 There are probably enough cafes and day time provision but little or nothing for the evenings. There is also a voiced demand for gym and leisure facilities.

30.4.7. Permanent pedestrianisation would be popular and encourage more visitors to the town centre to wander and shop. Improvement to the provision for edge of town parking will be essential to the success of this development.

30.5 Main development opportunities

30.5.4. The land south of the A30 must be reserved for employment purposes. There is an urgent need for a farsighted initiative to take the land back into local authority or LEP control, and some leadership shown to enable economic enterprise to take place. Small to medium units with local food producers encouraged to take them on. Plus, in the light of the global climate emergency, which the Dorset Council recognizes, green enterprise should be encouraged. Starter units to enable new types of businesses to grow would be ideal. Anything that encourages local employment and reduces travel.

4. BLANDFORD

7.1.1. We see no reason why Blandford and many of its surrounding villages have been included in the South East Dorset Functional Area other than to support the need for houses in the area south of the green belt in the

Bournemouth, Christchurch and Poole conurbation. It was the administrative seat of North Dorset for many decades, and is culturally and geographically linked to the Blackmore Vale to the north. It is a market town that provides services for both north and central Dorset. The area around Blandford is also part of Northern Area Planning for planning purposes, so it would be illogical to move it for the purposes of the LP.

Blandford will increasingly become a dormitory town for the BCP area with greatly increased volumes of traffic which will fly in the face of Dorset Council's strategic policy "...to reduce the impact on the climate by locating and designing developments to reduce distances travelled and minimise energy use." (see Dorset Council Local Plan, Section 3: The Environment and Climate Change, Figure 3.1: Strategic policies within the Environment and Climate Change section – Strategic Priority).

10.1.1. The description of the composition of "Blandford" fails to mention that the Development strategy for "Blandford" includes development in part of the parish of Pimperne which has its own made Neighbourhood Plan (PNP). The PNP has allocated land in the parish for the construction of 40 to 45 houses (PNP – "The main conclusions of the housing research were that, to meet local need in Pimperne, the Neighbourhood Plan should make provision for between 40 to 45 new dwellings between 2016 and 2031").

10.1.4. At the time of preparing our response to the consultation on the draft Dorset Local Plan, no response has been given to the legal advice submitted by Pimperne Parish Council, Cranborne Chase AONB Partnership and Dorset CPRE.

10.1.5. The description is incomplete and grossly understates the number of dwellings that is being targeted for development. In 10.3. Development strategy, the capacity detailed for housing amounts to 1,505 dwellings.

10.2.1. The visionary statements simply do not match what is being put forward in the draft plan. For example:

- **focus development on meeting local needs including needs for jobs, housing and infrastructure, providing opportunities for young people to stay in the area;**

The "focus development on meeting local needs" is contradicted by the response received by Dorset CPRE from Mr Terry Sneller (received 9th February 2021) in which he stated "National policy states that the Government's standard methodology should be used to calculate housing needs, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. We are required to meet the needs of all sectors of the market and not just those of local residents".

- **have protected the surrounding AONB landscapes and the floodplain of the River Stour, along with the countryside views and green spaces that contribute significantly to the town's character;**

A large part of the Dorset Council Preferred Sites on land to the north and north east of Blandford (see Figure 10.1, Chapter 10: Blandford) is either in the Cranborne Chase Area of Outstanding Beauty or overlooks it. The letter of objection to Wyatt Homes application P/OUT/2020/00026 submitted by Cranborne Chase AONB Partnership Board (16th December 2020) provides a very good description of the area as follows:

“Relationship to Cranborne Chase AONB - The northern, sloping plateau, area is within this Area of Outstanding Natural Beauty with the exception of the existing allotments. The south-easterly section is effectively the western valley side that faces this AONB, and the AONB boundary is the Pimperne Brook. The south-eastern corner of the proposed development abuts the AONB boundary”.

Earmarking this whole area (land north and north east of Blandford) for development is hardly “protecting the surrounding AONB landscapes”.

- **have protected the rural nature and distinctive character of the surrounding parishes;**

The draft local plan seeks to ride roughshod over the made Pimperne Neighbourhood Plan in that in this neighbourhood plan land has been allocated for between 40 and 45 houses to be built within the plan period ending in 2031. An important part of this plan is to maintain the “important gap” between Pimperne Parish and Blandford Parish.

Yet the draft Dorset Council Local Plan identifies part of the parish of Pimperne as being a Dorset Council Preferred Site (2020). Also, this draft plan states that the housing requirement for Pimperne’s neighbourhood plan area (Table A2: Neighbourhood Plan Housing Requirement in Appendix 2) is for 276 dwellings.

Pimperne Parish Council asked for an explanation between the two figures and the response given by Mr Ed Gerry on the 9th February 2021 was:

“Please see the document attached which provides a breakdown of how the figure of 276 has been derived. It should be noted that national policy requires that local plans should set out a housing requirement figure for designated neighbourhood areas. Therefore, if the existing Pimperne NP was to be reviewed the housing requirement figure in the emerging Dorset Council Local Plan is something that should be considered. However, there is no formal requirement for a neighbourhood plan to allocate sites for housing”.

The document to which Mr Gerry referred showed that land for 200 dwellings has been allocated according to Policy BLAN7 in the emerging Dorset Council Local Plan on land north-east of Blandford Forum. This is in addition to the 45 dwellings allocated in the Pimperne Neighbourhood Plan plus additional allocations for permissions for 10 houses that have already been given plus 21 houses referred to as Small Site Windfall Allowance (based on past completion rates).

- **have sought to mitigate negative impacts arising from climate change including seeking to reduce the risk of flooding in the town.**

A significant part of the land in the area north and north east of Blandford that has been allocated as a Dorset Council Preferred Site and land in which Wates Developments has interests, is in flood zones 2 and 3 (medium & high risk of fluvial flooding). The application from Wyatt Homes (P/OUT/2020/00026), on land which abuts the Wates Development land has had a holding objection lodged by Dorset Council, Flood Risk Management Team (ref. PLN20-074) applied “until further information and a fully substantiated drainage strategy is submitted and approved”.

As stated in the letter of (holding) objection, “This area of indicative fluvial flood risk is associated with the adjoining Pimperne Stream (Main River), which flows south / south-west to enter culverting aligned beneath the A354 and beyond to discharge into the River Stour (Main Stour), approximately 1.2km downstream (south) within Blandford”.

Given the above statement “...including seeking to reduce the risk of flooding in the town” it seems incongruous to have a stated vision of reducing flood risk in Blandford and yet to include this portion of land as one of Dorset Council Preferred Sites (2020) suitable for development.

10.3. Development strategy – comments are given later for specific sites.

10.4. Town centre strategy

Referring to Section 1, 1.3.29. A significant recent change from central government has been the introduction of the new Enterprise (E) Use Class which merges the previous town centre use classes (such as shops, financial and professional services, restaurants, cafes, gyms, offices etc.) into one. This allows greater flexibility for these types of premises to change between uses without requiring planning consent.

Specifically for Blandford, if the retail centre of Blandford is allowed to contract, our concern is that this will increase the likelihood that Dorset Council will view Blandford as a further extension of the Poole/Christchurch/Bournemouth conurbation. The danger is already there with the idea of Blandford being taken into the Verwood area and as part of the South Eastern Dorset functional area. If that happens, it is more than likely that there will be ribbon development on the A350 and further east to Verwood. In the long term, this would destroy the integrity of the local villages and the AONB.

10.5. Main development opportunities

a. General points:

Pedestrian and cyclist links: If Dorset Council wishes to improve “safe, attractive and convenient cycle and pedestrian links, it must be prepared to invest in the ensuring that these links are safe for pedestrian and for cyclists and that the links are properly and regularly maintained. The COVID lockdowns have brought about a far greater numbers of pedestrians and cyclists sharing the same links which has made these links more dangerous to use, especially from those cyclists who use the links as speed tracks.

Pedestrian crossings: In Chapter 10.5.6. for St Mary’s Hill, mention is made of the establishment of a toucan crossing across the southern side of the town’s bypass. Similarly, in the Wyatt Homes application P/OUT/2020/00026, which has implications for the possible development of the land to the north and north east of Blandford, a number of pedestrian crossings on major roads (A350 and A345) have been included in the application.

The idea that these crossings could be safe for pedestrians and cyclists to use, beggars belief and should be resisted. The safer alternative but more expensive use of bridges should be insisted upon in any such plans. The proposed installation of such crossings will undoubtedly affect the free flow of traffic and could lead to an increase in the number of traffic accidents.

b. Development site specific:

AONB: Our comments above about given proper protection to AONB land apply to the draft policies BLAN 2, BLAN 3, BLAN 4, BLAN 5, BLAN 6 and BLAN 7.

Flood Risk: Our comments above about flood risk issues apply to the draft policies BLAN 2 and BLAN 7.

BLAN 7: Our comments about the plans and policy for development on the land to the north and north east of Blandford are as follows:

b.1 Inclusion of part of the parish of Pimperne in the Dorset Council Preferred Sites (2020).

The Blandford + Neighbourhood Plan (designation date 17th February 2014) correctly described that land within the parish of Blandford, Bryanston and Blandford St Mary and did not include part of the parish of Pimperne.

However, when the Blandford + Neighbourhood Plan 2011 - 2033 – Submission Plan January 2019 was published, the plan showed land within the parish of Pimperne had been included in the Neighbourhood Forum boundary and as part of the B2 Mixed Use Allocation site.

Following submission of the Examination of the Blandford + Neighbourhood Plan by the independent examiner, Mr Terrence Kemmann-Lane to Dorset Council, a legal challenge to this report was submitted on behalf of Pimperne Parish Council, Cranborne Chase AONB Partnership and Dorset CPRE. One of the main

issues concerned the inclusion of land in the parish of Pimperne in the “Neighbourhood Forum Boundary” and as part of the B2 Mixed Use Allocation site.

In the opinion of Stephen Morgan of Landmark Chambers, in point 28 to 30 he states:

28. Finally, Pimperne PC is concerned about the reference to potential development in its area which is of course outside but adjacent to the neighbourhood area covered by the BPNP. The Second Examiner (at 15.4) recommended removal of the reference within item xii of Policy B2 to Phase 2 scheme, which relates to land within the parish of Pimperne. In my view, as this relates to an area outside of the BPNP, it should not have been included.

29. The BPNP cannot lawfully refer to a Phase 2 within Pimperne since, as the Second Examiner states, this could give some ‘legitimate expectation of the Phase 2 scheme. I am very surprised that this is, if I understand correctly, not to be removed as in my view it should be.

30. This matter goes to legal compliance as well as basic condition (a), as the NPPF and PPG are clear that a neighbourhood plan can only relate to the area it covers – sections 38A(2) and 38B(1)(c) of the Planning and Compulsory Purchase Act 2004.

The Pimperne Neighbourhood Plan is “made” but so far the Blandford + Neighbourhood Plan 2011 – 2033 has not been “made”. No response to the whole challenge has been provided by Dorset Council and the plan has not yet been submitted for the final consultation phase.

b.2 Inclusion of land in which Wates Developments has an interest in, in the Dorset Council Preferred Sites (2020).

Part of the Dorset Council Preferred Sites (2020) on land to the north and north east of Blandford is land in which Wates Developments Limited has interests. As part of the Blandford + Neighbourhood Plan 2011 – 2033 Hearing, Genesis Town Planning acting on behalf of Wates, contended that this land should have been included in the consultation process and that the site represented an opportunity to boost the supply of housing in the area.

In the response given by the B+ Qualifying Body (B+ NP Qualifying Body’s Response to Matters raised by the Examiner as part of the Agenda for the Blandford + Neighbourhood Plan 2011 – 2033 Hearing) the following was stated:

“As a stand-alone site, the land is not required for the Plan to meet its housing or infrastructure needs. The Land Availability Assessment indicates there is a significant stock of land in and around Blandford with hard commitments and other smaller sites available.

As with the initial assessment of other sites, the Wates land would not deliver the specification in full or in part, and it was therefore not considered necessary to give it detailed consideration. This was a representation that sought an additional allocation of land rather than as part of a comprehensive proposal.

In its judgement, the DC and the Qualifying Body consider the housing and infrastructure requirements of the Plan are capable of being reached by virtue of the policies and allocations in the Submission Plan. They see no justification for allocating additional sites, otherwise where would plan-making end?"

Dorset Council's Response to Matters raised by the Examiner as part of the Agenda for the Blandford + Neighbourhood Plan 2011 – 2033 Hearing was "16. DC agrees with the comments made by the Qualifying Body in its statement".

We are deeply concerned that the draft Dorset Council Local Plan attempts to over-ride:

1. The made Pimperne Parish Council Neighbourhood Plan by including land within the parish of Pimperne as part of a Dorset Council Preferred Site (2020). Details of this have been included in our comments above in section 10.2.1 re "visionary statements".
2. Dorset Council's very recently made statement that the Council agrees with the Blandford + NP Qualifying Body, that the land to the north and north east of Blandford in which Wates Developments Limited has an interest should not be included in the Blandford + Neighbourhood Plan and yet it now has been as shown the Figure 10.1 Map of proposed development sites at Blandford.

So in summary, if it is concluded that development should take place on land to the north and north east of Blandford, then it should exclude land within the parish of Pimperne and the site in which Wates Developments Limited has an interest i.e. the plot of land immediately to the north of Black Lane.

Yours faithfully

Rupert Hardy
Chairman, North Dorset CPRE,
The Manor,
Winterborne Tomson,
Blandford DT11 9HA

rupert@hardyfinancial.co.uk