



North Dorset Local Plan Examination

Additional mid-hearing written material, May 2015

The Crown Estate (Ref: 2986)

Document reference: MHD012 and MDH008

Issue 7: Blandford (Note on ecological issues surrounding development at Blandford and the impact on the SSSI) and Issue 4: Housing (Changes to the housing trajectory)

- 1.1 The Council's additional material on the housing trajectory (document reference MHD008, paragraph 4.4 and figure 3.1) states that land at Lower Bryanston Farm should be pushed back in the Plan Period to 2029/30 to allow bat mitigation measures to establish. Whilst The Crown Estate remains supportive of developing a mitigation package to safeguard the habitat of Greater Horse Shoe bats at the Bryanston SSSI, it is not considered the restrictive timescale proposed in the updated housing trajectory is justified or consistent with national policy.
- 1.2 Following the Local Plan examination hearing sessions, AMEC met with Natural England on site (2nd April 2015) to discuss mitigation and the results of ecology surveys undertaken by AMEC at Lower Bryanston Farm (and West Blandford) during the course of 2014. The survey results show that the cockchafer beetle population (a favoured seasonal food source for breeding female greater horseshoe bats) is not particularly significant across the site (they were found in only 1 in every 5 test pits across the site). Bat activity surveys have shown no significant use of the site by Greater Horse Shoe bats other than boundary hedgerows which would be retained and augmented as part of a development scheme. Therefore, there is no justification to prevent development coming forward earlier if appropriate mitigation is put in place.
- 1.3 Furthermore, the Council's suggested amendment to put the site back later into the Plan Period is not supported by the response from Natural England following our discussions with them on site. The Council has failed to interpret the letter from Natural England (MHD012, Appendix C) correctly which actually states that development (on both The Crown Estate sites) could come forward in a shorter time period. The key extract from Natural England's response is as follows:

“As Colin (Morris) has pointed out newly recreated pastures will however take time to mature and the populations of cockchafers to build up. The longer local plan period is therefore helpful in this regard as if the proposals come forward towards the end of the plan period then newly established bat foraging features will have greater time to mature. However, given the relatively low levels of cockchafers on the Crown's proposed sites it should be possible to provide sufficient alternative bat foraging in a shorter time frame through implementation of a range of short to long term enhancement measures. For example, improving the condition of existing pastures (e.g conversion to low inputs / organic and appropriate grazing should allow a build up of cockchafers and other important insect sources far quicker than would be expected on a newly created grassland).”
- 1.4 A mitigation strategy will be tailored through further discussions with Natural England. A summary note prepared by AMEC, (provided in Appendix D of document MHD012) sets out a suite of measures, some of which could be implemented to protect local habitats. There are various measures which could be implemented quickly such as new ponds and dung piles to improve local

bat habitats, in combination with longer term measures such as replacing/improving the grassland. AMEC is continuing discussions with Natural England to agree the extent and timing of mitigation measures to facilitate development now.

Summary and Recommendations

- 1.5 In summary, based on the survey findings it is concluded that the site is currently of limited habitat value for Greater Horse Shoe Bats. There is no evidence that either of The Crown Estate sites are extensively used by bats for foraging or are an important source of cockchafer beetles. Therefore, with the implementation of suitable mitigation measures over appropriate timescales, it would be possible to develop the sites sooner in the Plan Period than suggested by the Council. A suitable reference should be included in Policy 16 to control this in line with the response from Natural England but which does not prohibit the site coming forward sooner in the Plan Period. Suggested wording is provided below:

“Any planning application for the development of land at Lower Bryanston Farm should be accompanied by mitigation package outlining a strategy and timing of measures to protect local bat populations.”

The suggestion of delaying the release of Lower Bryanston Farm to later in the Plan Period should be rejected.

Document reference: MDH008 **Issue 4: Housing** **Changes to the housing trajectory**

- 1.6 The Council’s additional material on the housing trajectory (document reference MHD008, figure 3.1) outlines a number of sources of land to meet the increased development target of 5,300 dwellings over an extended Plan Period. Whilst The Crown Estate supports the principle of allocating further development at Blandford, it is concerned about the proposed increase of allocation on site 2/04/0460 (land adjacent to A350/A354 junction St Mary’s Hill Blandford) from 300 dwellings to 450 units. There appears to be no justification for this approach and it is not supported by the Council’s own evidence base or discussions at the Examination in Public.
- 1.7 As outlined in The Crown Estate’s response to Issue 1 during the Examination in Public, in order to provide a sound site selection process the Local Plan and Sustainability Appraisal should give a more balanced consideration to well-located and accessible locations to the town centre such as West Blandford and West Blandford St Mary. The site at West Blandford has consistently been identified in the Council’s evidence base as the most sustainable location to provide additional housing in Blandford, a point acknowledged on numerous occasions by the Council at the Examination in Public.
- 1.8 The Council also acknowledged at the Examination hearings that the revised scheme submitted by The Crown Estate as part of the examination process (for around 100 homes) removed harm to two of the identified heritage assets (Bryanston Cottage and the WWII anti-tank defence ditch). The Council’s further evidence on AONB/landscape (paragraph A7 of document MHD011) then outlines that the Council considers there is scope for a smaller scheme on the site, stating:

“However, if development were to be limited to the more ‘urban fringe’ northern part of the site, and the paddocks with the closest association with the floodplain landscape were left undeveloped, this would limit the identified impacts on character and important site features. The areas considered potentially as more suitable for development are those closest to the urban edge. Maintaining a green, open ‘wedge’ through any development would also help mitigate the impact on views, break-up the development and link physically and visually the existing floodplain meadows and the undeveloped grounds of the leisure centre.”



This confirms the Council's previous advice set out in North Dorset District Council (November 2013) Market Towns Site Selection Background Paper – paragraph 5.20 (examination reference, MTC001).

- 1.9 Therefore given the agreed sustainability credentials of the site and that the Council considers heritage and landscape impacts can be mitigated, there is no justification for the failure to include land at West Blandford to meet the housing requirement. The Local Plan should identify West Blandford as a location to meet additional development needs in the town to provide a sustainable development strategy. Natural England also confirm in their response (Appendix C of document MHD012) development on the West Blandford site would be acceptable from an ecological perspective. The exact scale and form of the development would be determined either through the Local Plan Part 2 or the planning application process.
- 1.10 Further development at West Blandford would provide a sounder spatial strategy rather than allocating further development in less sustainable locations severed from the town by the by-pass. The Council's own evidence does not support the approach of increasing the scale development on site 2/04/0460 (land adjacent to A350/A354 junction St Mary's Hill Blandford) outlined in paragraphs 3.11 to 3.14 of document MHD006 from 300 dwellings to 450 units over more sustainable options. Document reference MDH011 concludes in Appendix A, paragraph A.2 that development between the A354 and A350 would "*extend beyond the logical edge provided by the A354*" and continues in paragraph 6.2 that "*due to sensitivities and vulnerabilities....any form of mitigation would have limited effectiveness.*" It concludes (contrary to the recommendations in document MDH006) the only reasonable form of mitigation would be restricting development to a small area of low lying land in the north east corner. To further increase the allocation of this site, which is acknowledged to have significant landscape issues and is less sustainable, rather than re-allocating land at West Blandford is therefore not justified and is illogical.
- 1.11 Finally, the current settlement boundaries would prevent the Council from making further allocations to meet the increased housing needs over the Plan Period. Through the examination process we raised concern that a reliance on current settlement boundaries could stymie development. Whilst the Council is proposing some remedy for this to allow growth locations to be brought forward (as outlined in paragraph 6.5 of document MHD006), we believe this does not go far enough. The increased development needs in the District up to 2031 emphasises the need to remove settlement boundaries to provide a more positive strategy which gives sufficient flexibility for land to be brought forward to deliver the District's substantial development needs up to 2031. The boundaries are out of date and should be removed.

Summary and Recommendations:

- Include land at West Blandford within Policy 16 as a location for new homes (the scale of development to be determined either through Local Plan Part 2 or the planning application process);
- Reject the increased allocation of site 2/04/0460 (land adjacent to A350/A354 junction St Mary's Hill Blandford); and
- Delete reference to the out of date settlement boundaries.