

# **BRYANSTON PARK PRESERVATION GROUP**

Supported by



Mrs. Deborah McCann BSc MRICS MRTPI Dip Arch Con Dip LD  
Examiner

12<sup>th</sup> May 2017

Dear Mrs. McCann,

## **NDDC Examination of the Blandford + Neighbourhood Plan – Revised Sustainability Appraisal Report & Crown Meadows Local Green Space**

I received your Email to Mr. Gerry dated 13<sup>th</sup> April on 11<sup>th</sup> May 2017 requesting a response by 19<sup>th</sup> May 2017. Consequently the Bryanston Park Preservation Group (BPPG) response is prepared in more haste than we would have desired. The Group responds to your examination of the plan as follows:

### **Revised Sustainability Appraisal Report ( SA) – Paragraph 7.13**

The Blandford + Neighbourhood Plan (B+ NP) is in general conformity with the strategic policies of the NDDC Local Plan (LP) development policies. In particular, the B+NP mirrors the LP in its objection to any development of the Crown Meadows/Bryanston Deer Park. We are in agreement with Paragraph 7.13 set out below.

7.13. A fifth alternative of developing Crown Meadows to the north of the town centre was considered, again for this same quantum and mix of development. However, this was not considered 'reasonable' for two reasons. Firstly, the extent of the negative heritage effects of developing this land were such that NDDC was required to remove a similar proposal from its Local Plan on the advice of Historic England. The Councils supported that decision and have no further reason to believe that the proposal would be any more acceptable now than at the time it was removed. It is therefore a 'non-starter' in technical terms. Secondly, the proposal generated very significant levels of objection from local people, to the extent that its inclusion in the Neighbourhood Plan would seriously risk a failed referendum, and is therefore a 'non-starter' in political terms. It is noted that the legal position on excluding 'non-starter' options from the definition of 'reasonable alternatives' in the SA/SEAs of neighbourhood plans was clarified by the Judicial Reviews of the Tattenhall (EWHC 1470 of May 2014) and St. Ives (EWHC 2817 of November 2016) Neighbourhood Plans in respect of their compliance with the SEA Directive.

At the hearing, Mr. Stuart Williamson of Amec representing the landowner Bryanston RFE Ltd (RFE) questioned the validity of the LP removing the Crown Estate's development proposal from the LP development options. He went on at length to outline his reasons for the future development of a modified and more limited site.

The LP was agreed by the Examiner (Mr. David Hogger) less than 16 months ago following several years of detailed assessment and consultation. BPPG does not accept that it is appropriate to carry out a further review after such a short space of time. Nor is it appropriate that RFE should use the examination of the B+ NP in an attempt to overturn the democratically agreed LP.

BPPG notes that the B + NP complements and supports policy 16 of the New Local Plan Part 1 which excludes any possible development of the Crown Meadows.

On a practical level, RFE have not carried out the ground water investigations recommended throughout the previous 5 years of consultation on the Crown Meadows. Test bore holes carried out and maintained by BPPG clearly show that when the river level rises above 34m AOD at least 50% of the proposed site is subject to ground water flooding.

The prolonged wet period over Christmas 2013 verified the Environmental Agency's prediction of the areas of the Crown Meadows at risk of flooding from surface water and provided a visual confirmation of the water table level. Using this data it is estimated that all areas of the meadow below 37.75m will fall outside the recent Government recommendation that the water table should be at least 1m below the surface for any new building on a flood plain; the planned development begins at 34.6m and the area between 34.6m and 37.5m represents approximately half the proposed site. A high water table also reduces the efficiency of any Sustainable Drainage Systems (SuDS) used to handle surface water runoff. The SuDS scheme proposed by the RFE for the Crown Meadows is therefore inadequate.

#### **Addendum to B + NP Local Green Space Report.**

##### **Crown Meadows Local Green Space.**

At your request the Steering Group has reduced the size of the proposed protected area from about 6.4 Ha to 3.6 Ha in order to meet the #77 tests of the NPPF. The Steering Group is concerned that the larger space cannot be clearly defined and so may not win the Examiner's support in respect of meeting the #77 tests of the NPPF.

The fact of the matter is that together BPPG and The Dorset Garden Trust can set out the clearly defined borders of the historic 18<sup>th</sup> century Deer Park that Historic England and the people of Blandford Forum are determined to protect. It is well known that development creep is a fact of life and this must not be allowed to spoil Blandford's unique and historic setting. When dealing with Policy 16 of the LP (Crown Meadows), Historic England points out that "Blandford is one of the finest Georgian towns in the country and the contribution of its setting to that significance is a critical matter emphasised in stature and national policy." The Crown Meadows are not for development.

For this reason BPPG cannot support the sacrifice of a substantial part of the Crown Meadows/Deer Park to potential development. Even the Dorset County Council Landscape Assessment and its recommendation should not be permitted.

[REDACTED]