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BLANDFORD + NEIGHBOURHOOD PLAN 2015-2031**Regulation 16 Consultation 12th August to 30th September 2016****Response Form**

The proposed Blandford + Neighbourhood Plan 2015-2031 has been submitted to North Dorset District Council for examination. The neighbourhood plan and all supporting documentation can be viewed on the District Council's website via: <https://www.dorsetforyou.com/article/422589/North-Dorset-Neighbourhood-Plans---Submitted-Plans>





Please return completed forms to:Email: planningpolicy@north-dorset.gov.uk

Post: Planning Policy, North Dorset District Council, Nordon, Salisbury Road, Blandford Forum, Dorset DT11 7LL

Deadline: Friday 30th September 2016. Representations received after this date will not be accepted.**Part A – Personal Details**

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted**. By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection.

*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

	Personal Details (if applicable)*	Agent's Details (if applicable)*
Title	Mr.	
First Name	John	
Last Name	Cook	
Job Title (where relevant)	Chairman	
Organisation (where relevant)	Bryanston Park Preservation Group (BPPG)	
Address		
Postcode		
Tel. No.		
Email Address		

Part B – Representation

1. To which document does the comment relate? *Please tick one box only.*

	Submission Plan	<input checked="" type="checkbox"/>
	Consultation Statement	<input type="checkbox"/>
	Basic Conditions Statement	<input type="checkbox"/>
	Other	<i>Please specify:</i>

2. To which part of the document does the comment relate? *Please identify the text that you are commenting on, where appropriate.*

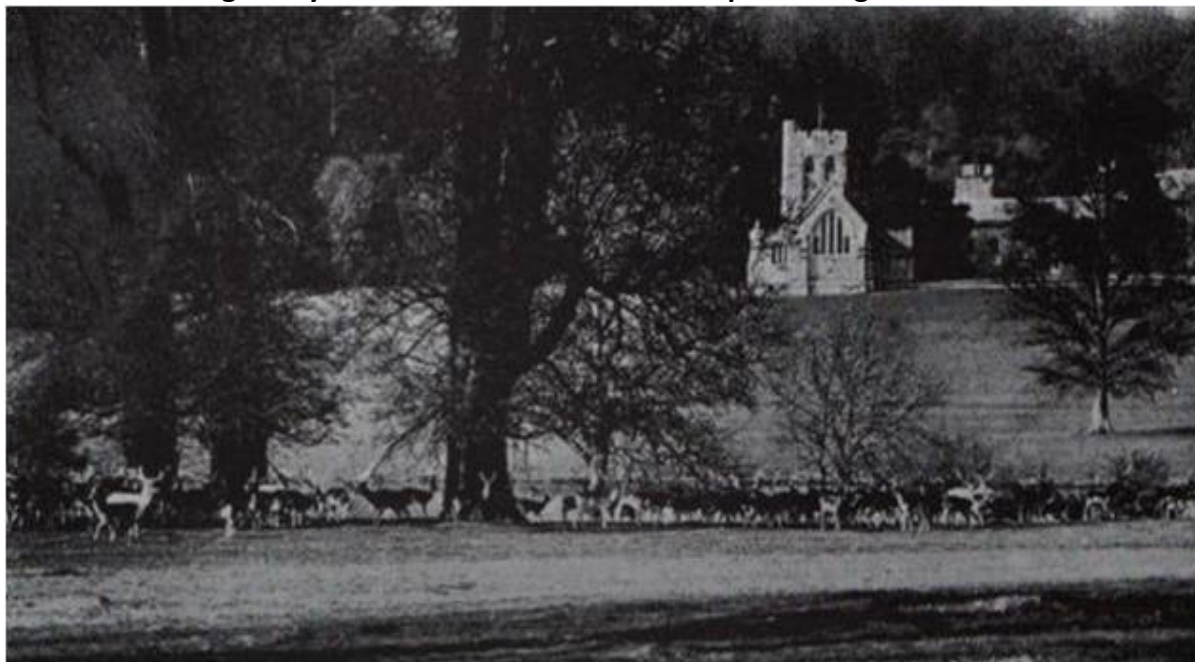
	<i>Location of Text</i>
Whole document	
Section	3 Land Use Planning Policies
Policy	Policy 10 – Local Green Spaces 4. Crown Meadows
Page	25
Appendix	Maps Insets 1, 2 & 3

3. Do you wish to? *Please tick one box only.*

<input checked="" type="checkbox"/>	Support
<input type="checkbox"/>	Object
<input type="checkbox"/>	Make an observation

4. Please use the box below to give reasons for your support/objection or make your observation.

Bryanston Park also known locally as The Crown Meadows fully meets the criteria set out in the National Planning Policy Framework for “Local Green Space Designation.”



Bryanston Park, known locally as The Crown Meadows, was created for the Portman family in the 18th Century and is significant in the historic evolution of the town. It is of historic significance in that it is a rare 18th century Deer Park whereas most Deer Parks were established in Medieval times. It has also figured in more recent history. Michael Le Bas in his capacity as Trustee and Editor of the Blandford and District Civic Society and Curator of the Blandford Museum has highlighted the significance of the WWII defences, now granted Grade II listed status by Historic England.

The Park provides a unique and beautiful rural setting for the town reaching right to the edge of the historic core and is equally important to Bryanston Woods which endows the town with such a perfect backdrop.

The entire park is of immense value to residents and visitors and its identification as one of the Conservation Sub-Areas conveys a legitimate expectation that its intrinsic character will be protected from development. It has not been developed to date, despite its accessibility advantages etc, precisely because of its intrinsic value. Nothing has changed to justify an end to its continued protection. The recent change of ownership from The Crown Estate to Lord Rothermere's Trust (Bryanston (RFE) Ltd.) must not be allowed to disturb its protected status.

Crown Meadows to the west of the town make a vital contribution to its historic context and landscape setting. The Insall Report noted that 'The intensely urban quality of the town centre is marvellously enhanced by the rural beauty of Bryanston Park, the River Stour and Bryanston Woods. The river is one of Blandford's greatest but most underplayed assets . . . this is a delightful area full of opportunities for improvement and public enjoyment' (Insall p.35).

The Insall report stressed that 'the striking Georgian quality of Blandford is apparent not only from within the town but also from outside, from the hills which encircle the town. Modern development immediately next to this Georgian core must not be allowed to swamp the distant view' (Insall, p.46).

The meadows are of high value due to their contribution to the historic context and setting of the town and their amenity value as undeveloped countryside. The Crown Meadows and the River Stour flood plain are an open parkland landscape with important groups of mature trees.

The SA, part of NDDC Local Plan Part 1, acknowledges the importance of preserving the feeding habitat for the Horseshoe Bats. Colin Morris of the Vincent Wildlife Trust (VWT) has set out in comprehensive terms the sensitivity of this species to habitat change and the irreversible harm that would result from the loss of the grazed unimproved pasture at Bryanston Park. This habitat is adjacent to the roost at Bryanston and is of vital importance to the bats that rely on Cock Chaffer beetles (*Melolontha melolontha*) during spring, after the rigours of hibernation, and Dung Beetle (*Geotrupes*) in late summer and early autumn. Due to the poor habitat around Blandford, mature animals forage as far away as 10 miles from the roost, but the young bats feed within 2 kilometers which is why Bryanston Park is so important for all the animals. The Roost is designated as a SSSI.

Colin Morris of VWT believes that it may take 20 years or longer to create a bio mass of sufficient quantity and quality to equal that which would be lost. During this period the original pastures at Bryanston Park will have to continue to be grazed and the "new allocated land" being provided by local landlords will also require grazing until it has a viable population of target prey species. This regime would also require that the cattle aren't treated with chemicals (wormers) that will kill the larvae stages of *Geotrupes*.

It also has to be recognised and accepted that to enable the bats to use the new pasture there will have to be continuous hedgerows leading to and surrounding the potential new foraging areas. These hedgerows will need planting at a very early stage to allow 8 – 10 years growth before they become viable for use. They will also require an agreed management programme to ensure they are maintained at the optimum for bats use – i.e. tall, bushy and "mushroom" shaped. This issue alone should be sufficient to discount Bryanston Park as a credible growth option.

During the 5 years of consultation over the New Plan, 2010 – 2015, The people of Blandford consistently voted against any development of the Crown Meadows. Indeed, the inclusion of The Crown Meadows in the Draft Plan was the only point of dispute with the local population. It resulted in at least 2 extra consultations which delayed the adoption of the Plan for at least 2 years and cost the tax payer and The Bryanston Park Preservation Group (BPPG) tens of thousands of Pounds.

During June and July 2012 BPPG raised 5,756 signatures for a Petition against development of the Crown Meadows. This represents almost 56% of the total population of Blandford (2011 census) collected in only 2 months. With more time and resources, the result would have been almost unanimous, there were only a handful of objectors, and large parts of the town remained un-cavassed.

The impact of development at Crown Meadows on the historic environment was also raised as an issue by local people in response to consultation on the Local Plan Part 1 – Pre-submission Document. Of the 2,012 representations received in total, 1,372 were on questionnaires prepared by the BPPG.

The questionnaire identified two different options for growth: 'St Mary's Hill, Blandford St Mary site opposite the Tesco roundabout'; and 'Crown Meadows site (land west of Blandford)'. Respondents were invited to indicate their preference for their favoured site with 98% preferring the St Mary's Hill site and only 2% preferring the Crown Meadows site.

In response to English Heritage's concerns, the Council agreed to undertake a more in depth '**heritage assessment**' of the Crown Meadows site and, as this work progressed, it was also agreed that a similar assessment should be prepared for the St. Mary's Hill site. The completed heritage assessments were considered by English Heritage and their response stated:

"We concur with your evidence that development of the Crown Meadows would be inappropriate because of the degree of harm to the significance of a number of heritage assets. Conversely the historic environment assessment of the St Mary's (Hill) site demonstrates a more suitable option and one that English Heritage would not challenge if promoted."

Conclusion

BPPG urges the Inspector to accept the Blandford + Neighbourhood Plan policy 10.4 – Local Green Spaces in respect of Bryanston Park / the Crown Meadows so as to protect it from all future housing and infrastructure development.

Continue overleaf if necessary

5. Please give details of any suggested modifications in the box below.

1. The Modern Ordinance Survey Map describes the area known locally as he Crown Meadows as “Bryanston Park”. For the avoidance of doubt this description should be included in the Neighborhood Plan in Policy 10 point 4 on page 25 and site 15 in the Local Green Spaces Working Group Report – “ **Bryanston Park locally known as The Crown Meadows.**”.
2. The Local Green Spaces Working Group Report (LGSR) Section 2 para. 2.5 should be amended to include “See NDDC Heritage Assessment – Crown Meadows Blandford Forum.”
3. The LGSR Para 2.7 should be amended to add “The meadows are rare unimproved grassland vital to the endangered Greater Horseshoe BATs (GHB) as a feeding ground adjacent to the roost and so particularly important for the juveniles. The GHB are protected by both European and UK law.”
4. The LGSR Para 2.9 should be amended to include “The river bank is used by the Blandford Angling society as a fishing ground that hosts competitions for angling clubs throughout the Blackmore Vale.”
5. The LGSR Para 2.18 is wrong – the answer should be **YES!** The GHB are protected and the Habitat Regs 2010 apply.
6. The LGSR Para 2.19 add Kingfishers.
7. The LGSR Para 2.20 the answer is Yes – the unimproved pasture would take 20 years to replace to provide viable populations of Cock Chafer Beetles (Melolontha Melolontha) and Dung Beetles (Geotrupes) upon which the GHB feed.

Continue overleaf if necessary

6. Do you wish to be notified of the District Council’s decision to make or refuse to make the neighbourhood plan? Please tick one box only.

X	Yes
	No

Signature: _____

Date: 28th September 2016

If submitting the form electronically, no signature is required.

Please use this box to continue your responses to Questions 4 & 5 if necessary