

BRYANSTON PARK PRESERVATION GROUP



Supported by



Protecting Dorset
Campaign to Protect Rural England

24th January 2014



Mr. Trevor Warrick
Planning Policy Manager
North Dorset District Council
Norden, Salisbury Road
Blandford Forum
Dorset DT11 7LL

Dear Mr. Warrick,

**North Dorset Local Plan 2011- 2026 Part 1 Pre- submission Consultation 29/11/2013 – 24/01/ 2014.
Bryanston Park Preservation Group – Response Form**

I enclose the BPPG Consultation response form. I will forward an electronic copy of this Response and also our leaflet and Survey Monkey results in case this will be of assistance.

Yours sincerely,

John Cook
Chairman

Bryanston Cottage, Bryanston Street Blandford Forum Dorset DT11 7AZ. Tel: 01258 452 746 email:
johnandlexi@btinternet.com www.saveourcrownmeadows.btck.co.uk

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Batch number: _____	Received: _____
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Representation # _____	

North Dorset Local Plan Part 1

Pre-submission Consultation 29 November 2013 to 24 January 2014

Regulation 19 of Town and Country Planning (Local Planning) (England) Regulations 2012)

Response Form

For each representation you wish to make a separate response form will need to be completed.

This is a formal consultation on the legal compliance and soundness of the Local Plan before it is submitted to the Secretary of State for examination by an Inspector. For advice on how to respond to the consultation and fill in this form please see the 'Guidance Notes for Making Representations' that can be found on the Council's website at www.dorsetforyou.com/planning/north-dorset/planning-policy

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

Alternatively you can submit your comments online at: www.surveymonkey.com/s/NorthDorsetLocalPlan

Deadline: 5pm on 24 January 2014. Representations received after this time may 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**. Representations cannot be treated in confidence as Regulation 22 of the Town and County Planning (Local Planning) (England) Regulations 2012 requires copies of all representations to be made publically available. By submitting this response form on the pre-submission North Dorset Local Plan Part 1 you consent to your information being disclosed to third parties for this purpose, but signatures, private telephone numbers and e-mail addresses or private addresses will not be visible on our web site, although they will be shown on paper copies that will be sent to the Inspector 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)		<div style="border: 1px solid black; padding: 5px; text-align: center;"> <p>NORTH DORSET DISTRICT COUNCIL</p> <p>24 JAN 2014</p> <p>POST ROOM</p> </div>
Organisation (where relevant)		
Address		
Postcode		
Tel. No.		
Email Address		

Part B – Representation

The North Dorset Local Plan 2011 to 2026 Part 1 and its supporting documents have been published in order for representations to be made prior to submission to the Secretary of State for examination. The purpose of the examination is to consider whether the Local Plan complies with the **legal requirements** and is **'sound'**.

If you are seeking to make a representation on the **way** in which documents have been prepared it is likely that your comments or objections will relate to a matter of **legal compliance**.

If you are seeking to make representations on the **content** of the documents it is likely that your comments or objections relate to the **soundness** of the plans and whether it is justified, effective or consistent with national policy.

Further information on the matter of legal compliance and the issue of soundness can be found in the 'Guidance Notes for Making Representations'.

If you need help completing the response form please see a member of the Planning Policy Team at one of the consultation exhibitions or call 01258 484201.

1. Please select which document you are commenting on:

- North Dorset Local Plan 2011 to 2026 Part 1 (please complete Questions 2 to 9)
- Final Sustainability Appraisal Report (please complete Questions 2 and 10)
- Habitats Regulations Assessment (please complete Questions 2 and 10)

2. Please state the part of that document you are commenting on:

Paragraph number: 8.11, 8.13, 8.14, 8.15, 8.19, 8.19, 8.22, 8.23, 8.24, 8.47, 8.49	Policy/site: 16 The Crown Meadows – Land West of Blandford	Policies map: 16 Figure 8.1
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3. Do you consider the Local Plan to be legally compliant and prepared in accordance with the Duty to Cooperate, legal and procedural requirements?

- Yes No

4. Do you consider the Local Plan to be 'sound'?

- Yes No

5. If you consider the Local Plan to be unsound please specify your reason(s) by ticking the box(es) that apply below

- It has not been positively prepared
- It is not justified
- It is not effective
- It is not consistent with national policy

6. Please give specific details of why you consider the Local Plan has not been prepared in accordance with the Duty to Co-operate, legal or procedural requirement or why you consider the plan to be unsound. Alternatively, if you wish to support any aspects of the plan please also use this box to set out your comments.

The allocation of the Crown Meadows for housing development is not justified because:

- A. The overwhelming majority of residents oppose the development because all traffic generated will be forced into the already heavily congested one way system through the Town Centre. The development would also severely negatively impact Blandford's iconic heritage setting. The Crown Meadows, formerly part of Lord Portman's deer park, have been preserved in previous Local Plans under Policy BL7. There is no reason to abandon this policy. There is an alternative site to the South (SHLAA ref: 2/04/0480) which has none of the negatives attached to the development of the Crown Meadows. This is the preferred option of Blandford's residents. The allocation therefore is in conflict with the aims of the Localism Act and is therefore not justified. It is also in conflict with Policy 16 para 8.3. It should be designated as a Local Green Space under Policy 4 para 4.105 in the Blandford Community Plan which is now under preparation in conformity with Policy 16 para 8.4 and 8.13.
- B. The Draft Core Strategy approved for consultation in March 2010 was deliberately obscure in the case of the Crown Meadows. The site was described as "Land West of Blandford" in order to conceal from Councillors the true location. When released, the Blandford Councillors were shocked and indeed Councillor Tanner proclaimed that he had not voted for that. But he had of course. The Key Question for Blandford was whether the site to the North East (800 houses), Option 1, or the Land West of Blandford (The Crown Meadows 200 houses) Option 2 should be allocated for development. Over 1,300 responses preferred Option 1. Planning Officers then announced that Option 1 was not sustainable because it lay outside the bypass. The consultation was a democratic charade as Planning Officers had long ago decided that Option 2 was the preferred option regardless of the outcome of their public consultation. These actions are not justified.
- C. The BPPG submission in this consultation dated 12th April 2010 urged the Planners to assess the Southern site:
Quote .. Neither the New Plan itself nor the Initial Sustainability Appraisal Report (SA) refers to a perfectly valid option to develop land to the south of the town in the quadrant formed by the A350/A354 junction (SHLAA 2/03/0460). There is no explanation why such an option has been discounted without the opportunity for debate. This land is outside the AONB and is not a designated or sensitive landscape. The location has distinct accessibility advantages being close to Tesco and the future Brewery employment site and on an attractive "green route" into the town centre. At the very least, this land should be evaluated objectively against the other Options 1 and 2....Unquote
This work was finally carried out in the Addendum to the Initial SA (ASA) dated October 2012. However, because of their single minded support of the Crown Estate Team, Planners have not engaged or supported the Landowners, Blandford St. Mary Homes Ltd (BSMH), in bringing forward the site St. Mary's Hill (SMH). This situation has forced BSMH to carry out a public consultation exercise and to submit a request for pre-application advice to the local planning authority. A meeting was held at the Offices of North Dorset District Council on 15th January 2014. All of the problems outlined in the ASA have been or are in the process of being addressed. This makes the site sustainable deliverable and it is therefore a valid alternative to the Crown Meadows. Councillors were told by the Planning Policy Manager that there was no alternative. Indeed Cllr David Walsh advised Cabinet that it was 'Hobson's Choice', and that there was no alternative to The Crown Estate (TCE) proposal. The Cabinet and Full Council were told that failure to include the TCE proposal could result in the Inspector insisting on further consultation that could result in a further delay of at least 3 – 6 months. This was misleading and was designed to persuade Cabinet and Councillors to accept the need to include the TCE development proposal. The Planning Policy Manager has subsequently told me that he thinks that further consultation would be unlikely should Councillors decide to allocate the SMH site. These actions are reprehensible and the decisions unsound. Consequently the allocation in the Plan of the Crown Meadows is not justified. It should be removed and St. Mary's Hill allocated in its place.

D. Summary of planning objections to Council's preferred Growth Option : Bryanston Park/Crown Meadows

(i) Adverse landscape impact - loss of intrinsic rural character - harm to the quality and appearance of the Blandford Conservation Area and the historic setting of the town - harm to the setting of the Dorset AONB.

(a) Bryanston Deer Park was created for the Portman family in the 18th Century and is significant in the historic evolution of the town. The Park is integral to Blandford's unique and iconic setting; a beautiful rural scene reaching right to the edge of the historic core. The whole area is within the Conservation Area, which the Council has a statutory duty to "preserve or enhance".

(b) The entire Park is of immense value to residents and visitors and its identification as the River Stour Meadows Conservation Sub-Area conveys a legitimate expectation that its intrinsic parkland character will be protected from development.

(c) Conservation Area status does not merely confer a need for higher quality design. Where the *special interest* of an area derives from its *undeveloped* rural character, it should be protected from *all* development regardless of design considerations.

(d) Sustainable development requires efficient and effective use of land. This means development at a far higher density than has been typical on the periphery of a town. The intensity of such development, exemplified by the uncompromising spread of places like Poundbury, will be intrusive and out of keeping. It will harm important vistas of the town and its landscape setting from the many public viewpoints throughout the Conservation Area and AONB.

(e) Only after publication of the Consultative Draft did NDDC commission Dorset County Council to carry out a Landscape Impact Assessment of all potential growth options namely Bryanston Park/Crown Meadows, including land northeast of the town (Option 1) and the land between the A350 and A354. The study concluded that development of *any* of these sites would have a negative impact on the landscape. No attempt was made to rank the option sites but in respect of Bryanston Park the study noted the harm to the Conservation Area and the setting of the AONB and recommended that any development should be restricted to the northern fringe of the site, accounting for only about 20% of the suggested allocation. The Council has ignored this recommendation. The St Mary's Hill site is neither AONB nor within a Conservation Area.

(ii) Impact of extra traffic on local highway network – town centre congestion.

Blandford's one-way system through the Town Centre is subject to congestion at any time. During peak periods and the twice weekly markets, traffic is regularly at a standstill and backed up along the entire length of East Street and in West Street. The Bryanston Park land has one point of access and it is onto the one-way system. Any vehicle emanating from the development here will have to leave via Whitecliff Mill Street with no option but to return via East Street or West Street, the Market Place, Salisbury Street and Whitecliff Mill Street again. This will worsen the already unacceptable congestion within the Town Centre with significant economic, environmental and social consequences.

It is not accepted that the proximity of the site to the Town Centre will have anything more than a marginal effect on overall extra vehicle movements as residents drive to work, to the supermarkets, or for leisure. The Town Centre is equally accessible on foot from the other growth options but any vehicles would have immediate access to the bypass.

Residents of St Mary's Hill would not need to drive into town unless they have a specific reason to use the Town Centre

(iii) Other issues

(a) Flood Risk: It is claimed that the site of the proposed development is not at risk of flooding, yet the District Council's own Strategic Flood Risk Assessment carried out in February 2008 shows the 1979 flood event "overlapping" at least 50% of the site. Unprecedented flood events, even in July, suggest that "Flood Risk Assessment" is at best an uncertain science. Government Guidance requires that development should not take place on or near a flood plain unless there is no other alternative. Iford has flooded 3 times since Christmas Eve 2013 and was subject to a Severe Flood Risk on January 6th 2014. Fifteen acres of concrete do not bode well for residents living on the Stour downstream from Blandford. The flood extended over the Crown Meadows to 36.5m beyond the reference Oak Tree (See TCE map) on Christmas Eve with the flood marker at the bridge showing a level above the 34 meter mark.

The Crown Estate was negligent in carrying out flood risk assessments for the Crown Meadows as the studies did not include assessment of the risks to underground services due to the high ground water levels expected over a flood plain. 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 Crown Estate for the Crown Meadows is therefore inadequate.

(b) Biodiversity: Experts employed by TCE say that essential habitat for the Greater Horseshoe Bats (which incidentally are on the global IUCN Red List of threatened mammals) and other protected species lost to development can be replaced elsewhere. It can only be hoped, but not guaranteed, that such mitigation is successful. Why take the risk of irreparable harm if alternatives delivering a much better housing return are available? A Freedom of Information Request (FOIR) confirms that Vincent Wildlife Trust (VWT) experts, custodians of the Bryanston roost, do not share TCE's optimism. They have impressed upon the Crown Estate that mitigation measures must be put in hand before any development takes place. TCE naturally are not prepared to commence activities until they are sure that the land will be allocated for development and have expressed concerns that any necessary mitigation work should not delay their development timetable. VWT are concerned that replacement foraging may take up to 20 years to mature and have written to TCE as follows: *Quote.. Whilst in theory to give an area of land as compensation for the loss of habitat is a great idea, the mitigation for the loss of feeding will not have been met. It is not so much the loss of land that's an issue but the loss of insect bio-mass and quality. The cock-chaffer beetle larvae requires pasture and it may take up to 20 years for a viable and equivalent bio-mass to be built up from "virgin" land. Basically both pieces of land will need to be grazed at the same time for 20 years (maybe more) and there's no certainty that cock-chaffer beetle larvae will even 'take' to soil that has been below crops that will have had pesticides used on them. Due consideration should also be given to the planting and management of suitable hedgerows for the bats to use as corridors; these will also take many years to develop...Unquote.* Unless TCE can persuade VWT that their development passes the Habs Regs (maintenance of favourable conservation status) test, it will be difficult for the Council to support the site at EIP rendering the plan "ineffective".

(c) Heritage Assets: The boundary of the proposed development site forms part of the World War II Anti Tank Defences and has been Grade II listed by English Heritage. Reasons for its designation of Grade II listing is because of its 'intactness', 'rarity', 'group value' and 'historic interest'. The defence works are unique and provide a 'poignant' visual reminder of the impact of world events on Blandford Forum'. The defences are not a remnant as TCE has stated, but, in fact, one of the reasons for its designation of Grade II listing is because of its "Intactness: the structures have survived mostly intact". This historical feature brings tourism to Blandford – many visitors come to see it, especially during Dorset Architectural Heritage Week, and tours for schools and other parties are conducted by the Blandford Forum Museum Trust. The viewing of these features would be drastically impaired if houses were built alongside them and would damage Tourism for the town.

In light of the issues highlighted above, it beggars belief that Planning Officers still propose development of Bryanston Park/Crown Meadows. There is neither reason nor justification to develop this site whilst a viable alternative, namely St Mary's Hill is available.

E. Bryanston Park Preservation Group (BPPG) Petition

In just 2 months during July and August 2012, BPPG collected 5,756 signatures from local people who opposed the Crown Meadows development. The original petition papers were handed to the Chief Executive of NDDC with full media coverage including live interviews with BBC South Today. The Chief Executive and Planning Officers were urged to advise Councillors of this overwhelming demonstration of local opinion. In fact, the Planning Policy Manager did not include it in his post consultation briefing of the Council, because, he claimed, the petition did not take place during a consultation period. This is quite extraordinary and in conflict with Policy 16 para 8.3. This action is quite unjustified.

F. NDDC Revised Core Strategy Consultation 29/10/2012 – 21/12/2012

Planning Officers were fully aware of the strength of opposition to the TCE proposal but they produced key questions that were once again totally irrelevant and disingenuous to say the least. It raises the question as to whether the planning authority has carried out its duties under the Localism Act and established by the Aarhus Convention which requires full engagement with the public, not merely hearing without engaging. For this reason the Plan is neither sound nor legally compliant.

Question 20 – Do you agree that the indicative capacity of the proposed housing site to the west of Blandford (Deer Park/Crown Meadows) should be reduced from 200 to 150 homes?

First of all planners were totally aware that people wanted no homes built here so this is an inappropriate question. The portfolio holder of the Planning Policy Panel told one of our members that he was aware of this but TCE had drafted the questions and they had to be asked. Thanks to our FOI Request we know that TCE had no intention of reducing to 150 homes because this in their view did not make full use of the site. As a gesture, they may be prepared to accept 175 – 185 homes. We also know that the planning policy manager was aware of this. We have received no satisfactory explanation as to why the public was knowingly misled?

Question 21 - Should land be made available as public open space in the floodplain of the River Stour as part of an overall scheme for the development of the land to the west of Blandford Forum (Deer Park/Crown Meadows)?

It is a fundamental principle of planning that permission should not be bought or sold. ODPM Circular 05/2005 states that it is “...not legitimate for unacceptable development to be permitted because of benefits or inducements offered by a developer which are not necessary to make the development acceptable in planning terms.” The town is well served by large areas of informal open space including Stour Meadows and the Milldown. Bryanston School is permissive of use of its grounds by the public. The Trailway gives good access to the open countryside and its footpaths and bridleways. The development of the Deer Park/Crown Meadows will not, in itself, bring about a need for further informal open space that is not already provided for in existing resources. The offer of additional open space is neither *necessary* to make the development of the Deer Park/Crown Meadows acceptable in planning terms, nor *directly related* to it. Notwithstanding the above, it has also been readily apparent that the area of land suggested for the open space is inaccessible for significant periods of the year, winter and summer, due to the high groundwater level.

BPPG put out a questionnaire with 2 additional questions giving respondents a more logical way to respond. The results were analysed by NDDC showing as expected that development was near unanimously opposed and that the gift of free land was inadequate compensation and not acceptable. The continued inclusion of the site in the new plan is clearly not sound and certainly unjustified.

G. NDDC Current Consultation 29/11/2013 – 24/01/2014

BPPG have produced and distributed leaflets asking residents in simple terms where they would prefer to see the necessary houses built. Almost 1,300 Completed Leaflets were returned and delivered to planning policy at NDDC. Over 98% of respondents preferred the St Mary's Hill site.

7. What change(s) do you consider are necessary to ensure that the Local Plan is legally compliant and sound? It would be helpful if you are able to put forward your suggested revised wording of any policy

Policy 16 paragraph 8.24 is based on The Market Towns: Site Selection Background Paper which relies upon the deeply flawed ASA and ignores the recommendations of the DCC Landscape Impact Assessment. It should be amended to read:

Policy 16 – 8.24

The Council's preferred approach is to develop **land South of Blandford at St. Mary's Hill** and West of Blandford St. Mary. Developments in these locations would be convenient for all facilities and services and would have less impact on the landscape than the other options as indicated in the DCC Landscape Impact Assessment. The sites have good road access and do not require traffic to enter the heavily congested one way system in the Town Centre. Further the proposed developments have the support of the overwhelming majority of local people.

8. If your representation is seeking a change, do you consider it necessary to participate in the oral part of the examination?

No, I do not wish to participate in the oral examination

Yes, I would like to participate in the oral examination

9. If you wish to participate in the oral part of the examination please outline why you consider that to be necessary. Please note that the Inspector determines who is heard at the examination.

As Chairman of BPPG I legitimately represent the views of almost 6,000 Blandford residents. It is important that the Inspector fully understands how the special relationship that exists between NDDC Planning Officers and The Crown Estate has resulted in an allocation of development land that defies all normal understanding.

The development of Bryanston Park/Crown Meadows is opposed by the following:

The Blandford Town Council
The Blandford District Councillors
The Blandford County Councillor
The Campaign to Protect Rural England
The Blandford Civic Society
Almost 6,000 residents

It is unacceptable that Councillors from other towns and wards be allowed to force an unwanted decision on Blandford, which is the principal town in North Dorset.

The Crown Estate's justification for development of the Crown meadows is the profit of several million pounds, which will accrue to the Treasury. This is of paltry benefit to the Nation, even during a time of financial crisis, whilst the damage to Blandford's iconic heritage setting is immeasurable. Furthermore, Blandfordians will forever incur the price of a town centre blighted by increased traffic congestion and poor air quality.

- 10. Please outline your comments on the Final Sustainability Appraisal Report or Habitats Regulations Assessment.** Comments are not confined to 'soundness' issues, but respondents can express their opinions on the above documents and use it as a reference point on the 'soundness' of the Local Plan.

Habitats Regulations.

The TCE plan may not pass the Habs Regs Test which basically would make the plan unsound in this respect. The Crown Meadows, bordering on the River Stour, support a huge range of flora and fauna quite apart from the Greater Horseshoe Bats at the Bryanston SSSI. The list of animals and birds includes, but is not limited to, Otters, Swans, Herons, King Fishers, Ducks, Moor Hens, Owls Little & Tawny, Sparrow Hawks, Egrets Fire Crests and the more common song birds, Pigeons and finches.

The proposed TCE development will inevitably impact severely on the habitat of these animals and birds. By comparison, there is very little wildlife on St Mary's Hill. Corvids, Pigeons and hedgerow finches, most of which will not be disturbed by development in the longer term.

Final Sustainability Appraisal Report.

The reasoning behind the BPPG's stance is that we firmly believe the Sustainability Appraisal (SA) used to determine the preferred options for development, is seriously flawed. NDDC says the SA has been updated and that it *concludes that the approach outlined in the draft Core Strategy is still the preferred option.*

However, the original SA ignored from the outset the Conservation Area status of the Deer Park/Crown Meadows. Nowhere in the document was this vital statutory designation mentioned. The original SA was therefore defective. This is reflected in the weighting given to the various indicators in the original Sustainability Matrix, particularly 8, 9 and 10, which simply did not account for the substantial environmental and historic value of the Deer Park area as a **designated heritage asset**. Nevertheless this flawed analysis led to the allocation of the Deer Park as a preferred option.

It was not until Dorset County Council carried out the Landscape Impact Assessment (LIA) of the various options for growth that the Conservation Area status of the Deer Park/Crown Meadows was even acknowledged. **Yet the Council has not reviewed the original SA matrix in the updated version (ASA). It has simply added in the A350/A354 option. The analysis should be revised to properly reflect the substantially higher value of the Deer Park and its greater sensitivity to development.** In this event the BPPG is convinced that the A350/A354 option will be seen to be a far better comprehensive housing development prospect, delivering the required numbers of new homes and other benefits without the demonstrable harm to conservation and other interests.

For example; Under Policy 15(1) **Indicator 8** refers to protecting the District's heritage assets and distinct townscapes. The Deer Park was created for the Portman family in the 18th Century and is significant in the historic growth and evolution of the town. The Park is integral to Blandford's unique and iconic setting; a beautiful rural scene reaching almost to the edge of the historic core. The whole area is within the Conservation Area, which the Council has a statutory duty to "preserve or enhance". The land south of the town (A350/A354) has no such designation, no historical context and minimal environmental sensitivity. The updated SA indicator 8 attributes the same sensitivity to both the Deer Park and A350/A354 options (orange). By any objective measure, the impact of a large housing development on the special interest of a designated heritage asset will be far more harmful than on a non-designated landscape beside the bypass. The Deer Park option should have been scored "--" (red).

- Similarly, **indicator 9** refers to the importance of the district's distinct rural landscapes beyond just the aesthetic value. The historic environment is central to England's cultural heritage and sense of identity and hence a resource that should be sustained for the benefit of present and future generations. The historic interest in the A350/A354 land is limited to the surrounding field pattern and there is no comparison with the special interest of the Deer Park/Crown Meadows. The community has become used to the public policy, until now consistently administered by NDDC, to protect the public interest in the Deer Park/Crown Meadows regardless of ownership (BL7). And they now see that policy being abandoned. Again, the original SA scored the Deer Park option as orange. Had the Conservation Area status been acknowledged at that time it would surely have been red. And now we see that the A350/A354 option has been attributed a higher level of sensitivity. That cannot be justified, it is simply wrong!

- **Indicator 10** refers to reducing environmental impact. Quite apart from the harm to conservation interests, the Deer Park/Crown Meadows option will aggravate traffic congestion within the town centre. The environmental impact of existing traffic is already damaging and will be made worse. The Council's claim that people will not use their cars because of the proximity to the town centre is not realistic, it does not account for journeys further afield, travel to work, the supermarket shop or when it's raining! All traffic emanating from the Deer Park/Crown Meadows must return through the town centre. That will not apply to the A350/A354 option. There can be no justification for attributing the same score (orange) to each option.

There is no doubt that the updated Sustainability Assessment (ASA) which has been used to determine the preferred option is seriously flawed as it has failed to acknowledge the greater sensitivity of the Deer Park following the DCC Landscape Impact Assessment. It also fails to recognise positive benefits of the A350/A354 option such as extension of the trailway to link Charlton Marshall and Spetisbury with the town enabling safer, greener accessibility for the villages. The BPPG urges the Council to look again at the Sustainability Assessment and to properly reflect the acknowledged special status of the Deer Park, its higher environmental and historic value and acute sensitivity to any development. As it stands, the Plan is neither Sound nor justified.

11. Do you wish to be notified of any of the following? Please tick all that apply. We will contact you using the details you have given above.

- That the Local Plan Part 1 has been submitted for independent examination
- The publication of the recommendations of any person appointed to carry out an independent examination of the Local Plan Part 1
- The adoption of the Local Plan Part 1.

Signature: 

Date: 24/01/2014

If submitting the form electronically, no signature is required.

As Chairman of The Bryanston Park Preservation Group, I am authorised by the unanimous vote of the Committee to sign this Representation.