



Blandford + Neighbourhood Plan: Response on behalf Bryanston (RFE) Ltd

Objection to Policy 10: Proposed Local Green Space Crown Meadows

This response to the Blandford + Neighbourhood Plan is submitted on behalf of Bryanston (RFE) Ltd. These representations are in addition to those already submitted by Bryanston (RFE) Ltd. Specifically these submissions relate to the proposed designation of Local Green Space (LGS) covering part of Crown Meadows. Bryanston (RFE) Ltd **objects** to the identification of Crown Meadows as a LGS in Policy 10 as it does not meet the criteria for LGS designation as set out in the NPPF or PPG.

The NPPF makes it clear at paragraph 77 that *“designation will **not** be appropriate for most green areas or open space. The designation should **only** be used:*

- ▶ *Where the green space is in reasonably close proximity to the community it serves;*
- ▶ *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; **and***
- ▶ *where the green area concerned is local in character and is not an extensive tract of land.”*

An important point to note is that for the land to be suitable for designation **all** the above criteria must be met. The PPG also goes on to state that designating LGS will need to be consistent with local planning for sustainable development. In particular, plans must identify sufficient land in suitable locations to meet development needs and designation should not be used in a way that undermines this aim of plan making (ID: 37-007-20140306).

Assessment against the NPPF Criteria

It is considered that designating Crown Meadows as LGS originates from the identification of part of the site as a potential growth area throughout the preparation of the North Dorset Local Plan Part 1 rather than an objective assessment of the merits of this area.

Land owned by Bryanston (RFE) Ltd at West Blandford (within the north eastern part of the proposed LGS) was identified throughout various stages of the North Dorset Local Plan Part 1 preparation to deliver housing development. The site was consistently identified in the Council’s evidence base as one of the most sustainable locations to provide additional housing in Blandford and the District. Although the site was not carried through to the adopted Local Plan Part 1, the Council’s own evidence base in preparing the

North Dorset Local Plan identified that development could be accommodated on the site if it were limited to the more 'urban fringe' northern part of the site¹.

The proposed area of LGS is not local in character, it is clearly an extensive tract of land covering approximately 34 ha and forming part of the wider countryside in this area on the edge of the town. The PPG (Reference ID: 37-015-20140306) states that the blanket designation of land next to settlements to achieve a 'Green Belt' designation by the backdoor is not appropriate.

In considering a proposed LGS designation on a comparable edge of town site in Chapel-en-le Frith² the Inspector concluded that:

"The site is in a countryside location on the outskirts of the settlement, projecting into the wider countryside. As such, the character of the site is as part of the surrounding countryside, rather than local in character."

The Inspector continues:

"It is not the purpose of the Local Green Space designations to include countryside land that provides wider views of the countryside. In my view, the site is a large area which projects into the open countryside and is part of the wider countryside rather than local in character. Thus, even with the historical significance and possible wildlife significance, I do not consider that this site meets the criteria for designation as Local Green Space."

The same circumstance apply in this case, given that this is an extensive area of land fronting onto open countryside along the river corridor, it cannot be considered local in scale and does not meet the test for designation as LGS.

The designation does not have clearly defined edges and is not uniform in its character. Instead it is defined by a series of character areas which undermines its designation as LGS. It includes areas that are very different in their character and value. The boundaries of the proposed designation do not follow physical features but instead seem to be based on land ownership boundaries. With the exception of the playing field at Blandford School and land around Blandford Bridge, the proposed LGS designation to the north for instance follows the boundaries of Bryanston (RFE) Ltd ownership in this location. The designation does not include areas of school playing fields to the north of the proposed LGS or land to the west of the River Stour which are adjacent to the river and have similar attributes to the land currently proposed as LGS.

The Crown Meadows LGS area has not been shown to be demonstrably special to a local community and to have a particular local significance. Our specific conclusions on the criteria are:

- ▶ **Historic:** The assessment makes the assertion that all of the proposed LGS area contributes to the historic character and setting of the settlement without recognising that there are variations within the identified LGS area.

The north eastern part of the proposed LGS designation has more the character of an urban fringe. It is located around Deer Park Riding Stables and is characterised by a number of urban elements and uses, including modern residential properties on Parklands, Hanover Court and Portman Place, the Deer Park Stables and buildings related to the stables. Much of the

¹ North Dorset District Council (November 2013) Market Towns Site Selection Background Paper – paragraph 5.20.

² Chapel-en-le Frith Neighbourhood Development Plan Examiner's Report (paragraphs 169 and 170).



development is later twentieth or twenty first century in date, with some of the larger school buildings being built in the last few years.

Subsequently, the northern part of the area is framed between large scale utilitarian development at Blandford School (including the all-weather pitch) and the adjacent 60/70s development at Parklands which provides a hard transition from the urban area to the rural hinterland. The site has been visually severed from the historic core of the town by insensitive development over recent decades. It has no visual or physical connection to the historic aspect of the town centre.

This is in contrast to western area of the proposed LGS which runs adjacent to the River Stour. Much of this area comprises flood plain and is part of a former Deer Park. It is characterised by open meadow land. Given the alignment of the river it is only really the southern section which is important to views from Blandford Bridge. It is only therefore the small part of the proposed LGS designation nearest to Blandford Bridge which could be argued to make any contribution to the historic setting of the town.

Although the area contains some surviving sections of the WWII defences of Blandford Forum, there is very limited public access to this feature at present as it is mostly contained within the gardens of neighbouring properties, thereby limiting public enjoyment of this feature.

- ▶ **Beauty:** Like most of the land around the south western edge of the town, part of the LGS designation contributes to the setting of the town, with wider views over the countryside. This is therefore not sufficient in itself to meet this criteria. There is no other evidence to show that the Crown Meadows LGS is so demonstrably special and holds particular local significance that it would also justify designation as LGS. In addition, as noted above, only part of the proposed LGS contributes positively to the setting of the town with areas around Deer Park Stables being surrounded by urban development which does not positively contribute to the beauty of the area. The attributes of land immediately to the north and the west of the proposed LGS are similar also forming part of the river corridor but do not form part of the proposed LGS designation. Land to the west of the River Stour is included in the AONB but the area of the proposed LGS is largely excluded apart from land immediately adjacent to the River. Therefore, in designating the Dorset AONB it was determined that the beauty of the proposed LGS was not so significant to warrant AONB protection.
- ▶ **Recreational Value:** As noted in the LGS working party report the land is private property and does not include public rights of way. There is no public access or use on any part of the site. Therefore, there is no current recreational value to the site, nor has the landowner agreed to allow public access in the future.
- ▶ **Wildlife:** the LGS working party report makes the assertion that this area of land is important to ecology including for instance otters and aquatic birds. However, other areas of land adjacent to the river have very similar characteristics but are not within the proposed LGS despite offering a similar type of habitat for local ecology. The characteristics of land to the west of the river and to the north of the proposed LGS are similar in terms of potential ecological value. The boundaries of the proposed LGS are also arbitrary in nature and there is no reason to conclude the area proposed as LGS is more important ecologically than land immediately adjacent to it. A series of ecology surveys were previously undertaken to support the Local Plan process through liaison with Natural England. This exercise did not demonstrate that the land was so demonstrably special in ecological terms to warrant special protection.
- ▶ **Tranquillity:** There is no evidence to demonstrate that the site is particularly special and significant in this respect. As noted above, much of the land is adjacent to the town and subject to urban influences such as noise, traffic and lighting. Land has recently been developed for an astro-turf pitch immediately adjacent to the north eastern part of the designation with associated flood lighting and engineering works.

Overall, it is concluded that the Crown Meadows LGS is not demonstrably special and does not meet the designation criteria. Furthermore, in line with Paragraph: 011 Reference ID: 37-011-20140306 of PPG it is



not necessary to add additional controls if the land is already protected by designations such as a Conservation Area. Given the controls afforded over development by Conservation Area policies, then no additional local benefit would be gained by the designation of this land as Local Green Space. Subsequently the proposed Crown Meadows LGS should be deleted.