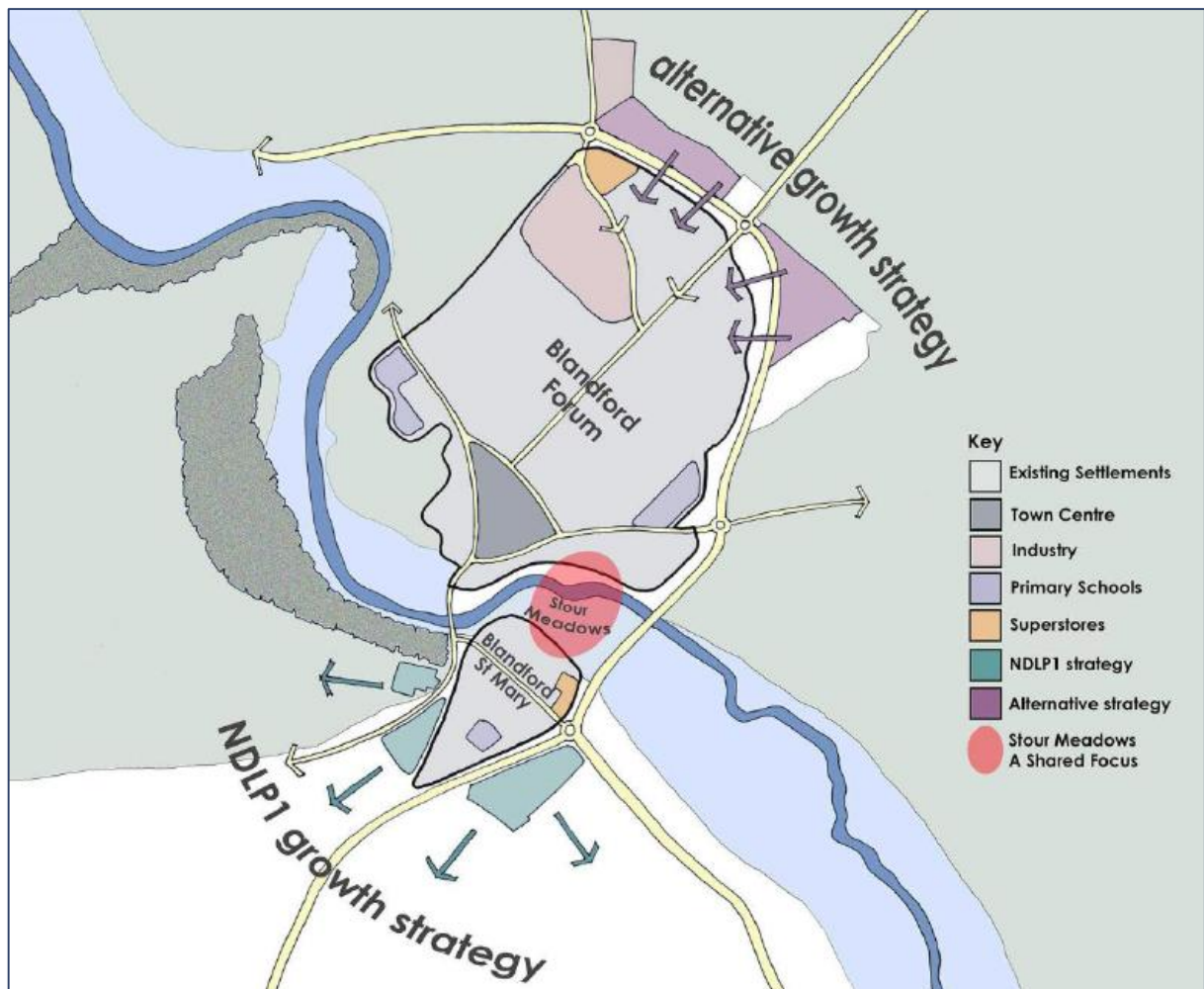


Blandford + Neighbourhood Plan

Response made by Bryanston (RFE) Ltd



Contents

| | | |
|------------|--|-----------|
| 1.0 | Introduction | 1 |
| 1.1 | Scope | 1 |
| 2.0 | Planning Policy Background | 1 |
| 2.1 | Planning Policy | 1 |
| 2.2 | Local Planning Policy | 1 |
| 3.0 | Basis for Response | 2 |
| 4.0 | Policies and Associated Consultation Questions | 3 |
| 4.1 | Policies Maps and coverage of the plan policies | 3 |
| 4.2 | Key Objectives..... | 4 |
| 4.3 | Policy 1 – Spatial Plan..... | 5 |
| 4.4 | Policy 2 – Land to the East of Blandford Forum..... | 8 |
| 4.5 | Policy 10 – Local Green Spaces | 9 |
| 4.6 | Policy 13 – Design Principles: Bryanston..... | 10 |
| 4.7 | Policy 14 – Local Tourism | 11 |
| | Appendix 1 – Blandford + Neighbourhood Plan Area | 12 |
| | Appendix 2 – Adopted Local Plan Bryanston Proposals map | 13 |
| | Appendix 3 – Adopted Local Plan: Blandford Forum Proposals map..... | 14 |

1.0 Introduction

1.1 Scope

1.1.1 This submission has been prepared following an invitation from the Neighbourhood Plan steering group to comment upon the Bryanston + Draft Neighbourhood Plan.

1.1.2 As a significant owner of land, property and woodland within the Blandford + Neighbourhood Plan area Bryanston (RFE) Ltd are keen to ensure that the policies within the Plan are responsive to local circumstances and support, rather than constrain, the development that rural communities and businesses require to meet their social and economic needs.

1.1.3 Within the Neighbourhood Plan Area Bryanston (RFE) Ltd owns 29 residential dwellings, 10 affordable housing units, 6 farm tenancies and 4 commercial units.

1.1.4 As the online survey monkey response page allows only limited responses to be provided, our submission is included wholly within this written report. This written report makes detailed comments on particular sections of the consultation documents. The sections to which the comments relate are clearly identified by each subheading.

2.0 Planning Policy Background

2.1 Planning Policy

2.1.1 *The National Planning Policy Framework 2012* (NPPF) sets out the Government's planning policies for England and how these are expected to be applied. The *Planning Practice Guidance* provides Government guidance on planning policy

2.2 Local Planning Policy

2.2.1 The current plan for North Dorset is the district-wide local plan which was adopted by the council in January 2003. Following the introduction of the NPPF in 2012 the adopted plan is only relevant where its policies accord with those set out within the Framework. The emerging North Dorset Local Plan - 2011 to 2026 Part 1 and associated documents was submitted to the Secretary of State for Communities and Local Government on 5 December 2014 for independent examination. The plan remains under examination and the Inspector has presented preliminary findings and changes which he considers would be best dealt with as Main Modifications.

3.0 Basis for Response

3.1.1 This response has been prepared with regard to the requirements of Neighbourhood Development Plans as set out in the Localism Act 2011. The Examiner of the plan is obliged to determine whether the plan complies with the Basic Conditions. These are that the Plan is required to have regard to:

National policies and advice contained in guidance issued by the Secretary of State;

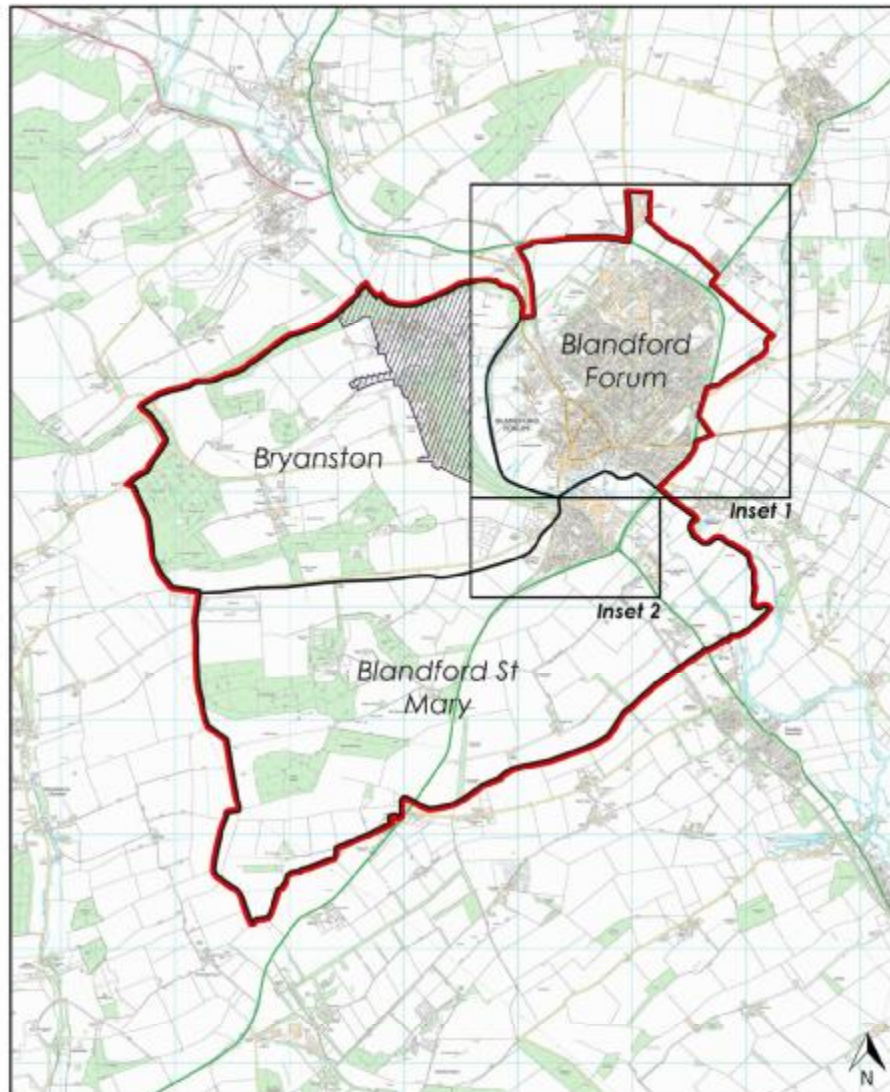
- contribute to the achievement of sustainable development;
- be in general conformity with the strategic policies contained in the Development Plan for the area; and
- not breach, and be otherwise compatible with, EU obligations and human rights requirements.

3.1.2 It is important to realise that rural estates such as the Bryanston Estate are entirely different entities with very different objectives to most other private landowners. Rather than being driven solely by a desire to make profit in the short term, Bryanston (RFE) Ltd is able to take a very long term view of its activities and understands its role in the local community.

3.1.3 In addition to owning land around local settlements Bryanston (RFE) Ltd also manages large areas of open countryside, woodland and historic buildings. Bryanston (RFE) Ltd acknowledges that its stewardship of the natural and built environment is a key responsibility and already plays a significant role in delivering social, economic and environmental sustainability in the area.

4.0 Policies and Associated Consultation Questions

4.1 Policies Maps and coverage of the plan policies



Blandford Plus Neighbourhood Plan

Policies Map - Draft Plan - October 2015



Figure 1 Blandford Plus Neighbourhood Plan Policies Map

4.1.1 The Blandford + policies map shows the three Parish Boundaries and the boundary of the area plan (see Appendix 1). The only policies shown on the map which are relevant to the areas outside of the

inset maps for Blandford Forum and Blandford St Mary are policies 11-13 – Design Principles. This reflects the fact that the overall focus of the plan is upon the more urban areas of the plan area, which is further evidenced through the plan’s key objectives which are discussed below.

4.2 Key Objectives

4.2.1 Within the key objectives outlined within the plan, there is a distinct lack of support for sustainable development in the rural areas of the plan and in particular, the Bryanston Parish area. In fact Objective 2 appears to oppose such development, as it expresses an objective to;

“Deliver a housing growth strategy focused on the development to the north and north east of the town to secure the community infrastructure the town needs and deserves, whilst minimising the impact of development on the smaller parishes of Blandford St Mary and Bryanston to the south west.”

It is our assertion that this objective fails to recognise the significant benefits that small-scale and sensitive rural development can deliver to these Parishes and the opportunities that may exist for appropriately designed, sensitive development that supports their social and economic vitality. In this respect, it appears that the plan may have overlooked the opportunities that exist within the rural settlements of Bryanston and Blandford St Mary Parishes to deliver sustainable development and is therefore inconsistent with Paragraph 28 of the NPPF – *Supporting a Prosperous Rural Economy*, which states that;

“Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- *support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;*
- *promote the development and diversification of agricultural and other land-based rural businesses;*
- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and*

- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.”*

4.2.2 Due to this lack of consistency with National Policy, it appears that the plan fails to meet the ‘Basic Conditions’ outlined within paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, which states that Neighbourhood plans must;

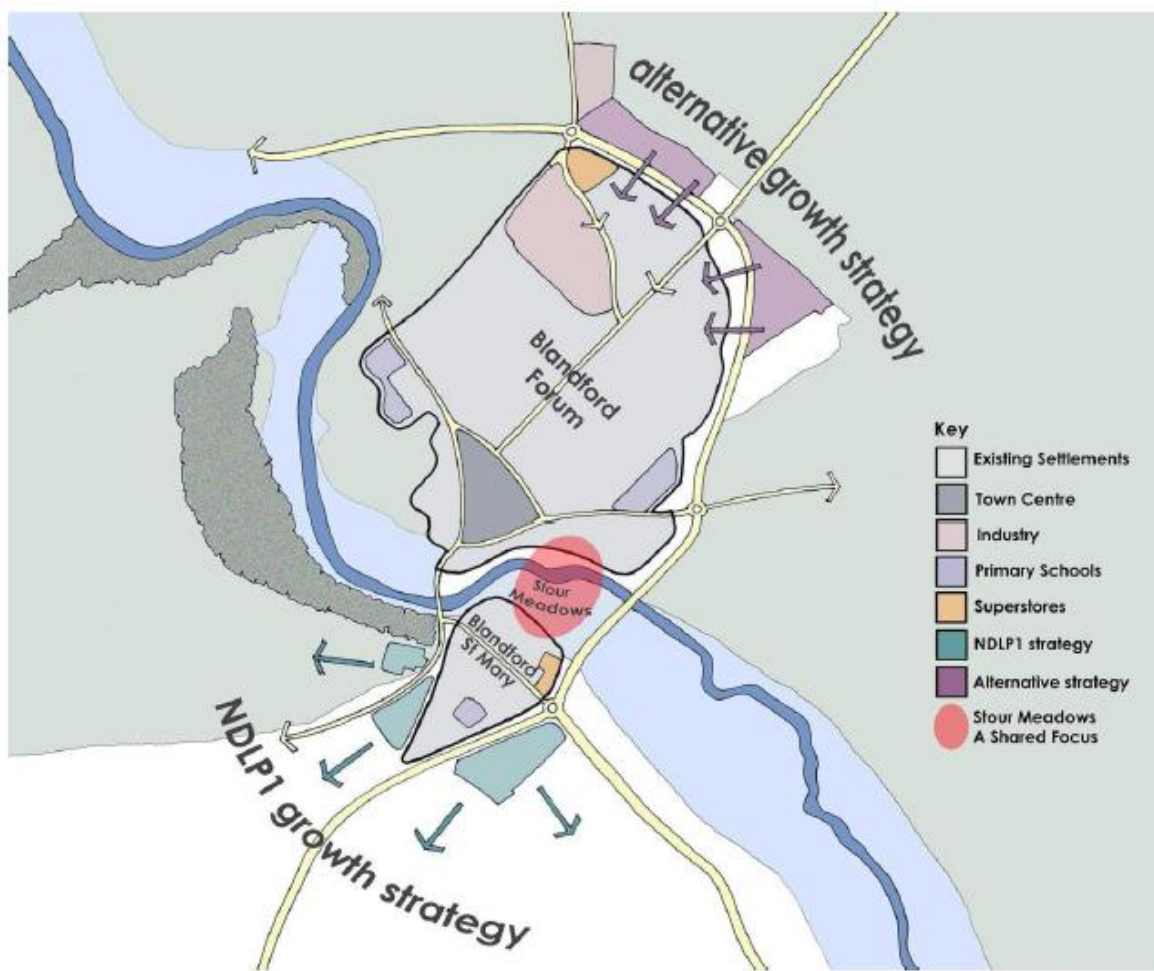
“Have regard to national policies and advice contained in guidance issued by the Secretary of State”

4.3 Policy 1 – Spatial Plan

Do you agree that the Plan should focus future growth on the northern and eastern edges of Blandford Forum and on the Town Centre?

4.3.1 Through the Inspector’s review of Part 1 of the emerging Local Plan, no objection was made to the Council’s preferred approach to directing development towards land to the west and south-east of Blandford St Mary. It is explained in the plan that the provision of housing in these areas is preferred due to the lower level of impact upon the surrounding AONBs and the Historic environment that would arise from development in these locations. The rationale for this strategy is well explained within the *Market Towns: Site Selection Background Paper* and is thus supported by thorough research and an appropriate planning process.

Consequently, Bryanston (RFE) Ltd is satisfied with the direction of growth that is emerging through the new North Dorset Local Plan and is supportive of its spatial strategy.



Plan B: Alternative growth strategy for Blandford Forum

Figure 2 Plan showing North Dorset Local Plan 1 growth strategy and the alternative growth strategy proposed by the Blandford Plus Neighbourhood Plan

4.3.2 In fact, one of the ‘Main Modifications’ incorporated into this emerging local plan was the increase in the housing requirement from 960 to 1,110 dwellings. This change serves to bolster the position of the Local Planning Authority but also heightens the need to consider alternative solutions to delivering the housing needs within the plan area. To this end, the potential for all areas within the Neighbourhood Plan area to contribute to the delivery of the increased housing target must be considered. Such consideration would also align itself more closely with National Planning Policy in terms of supporting rural economies as highlighted by the following extract from paragraph 001 of the NPPG section on rural housing (ID 50-001-20140306) which states that;

“It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. This is clearly set out in the National Planning Policy Framework, in the core planning

principles, the section on supporting a prosperous rural economy and the section on housing.

A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.

Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.”

4.3.3 Indeed, there are a number of specific small scale opportunities within the Bryanston Parish and particularly within Bryanston village itself which would offer the potential to deliver a modest yet valuable contribution to the overall housing target of the Local Plan area. Therefore, it is proposed that carefully designed proposals that emerge following positive community engagement and that acknowledge the locally distinctive characteristics of the area should be considered more closely. In this respect, Bryanston (RFE) Ltd would like to encourage the Neighbourhood plan to take a more progressive approach to such development, and to offer specific support for well-designed and considered proposals of an appropriate scale within Bryanston village.

4.3.4 Absent from the plan is any reference to the conversion of redundant buildings. Again there may exist specific opportunities for such conversions to take place on land owned by Bryanston (RFE) Ltd, which could also contribute to the delivery of sustainable development. The conversions of agricultural buildings are supported by Planning Policy and offer a range of opportunities to deliver the objectives of the Neighbourhood Plan. It may also be possible to accommodate a modest amount of new-build in association with a conversion scheme in order to deliver a viable and workable development structure.

The conversion and re-use of rural buildings is an inherently sustainable method of development as it is far less intrusive to adapt, and where necessary rebuild in part, an existing building than it is to introduce an entirely new building. This is especially the case within the Dorset AONB where the aim is to conserve or enhance the landscape setting. Such schemes are an excellent way of making the most efficient use of existing resources and reducing pressure on greenfield land and can make an important contribution to rural communities by providing new homes and economic opportunities for local people.

4.4 Policy 2: Land to the East of Blandford Forum

Do you agree the proposed mix of uses for this site? Will the policy ensure that the scheme will be acceptable, especially in terms of its effect on the adjoining AONB and on the local roads?

Policy 3: Land to the North of Blandford Forum

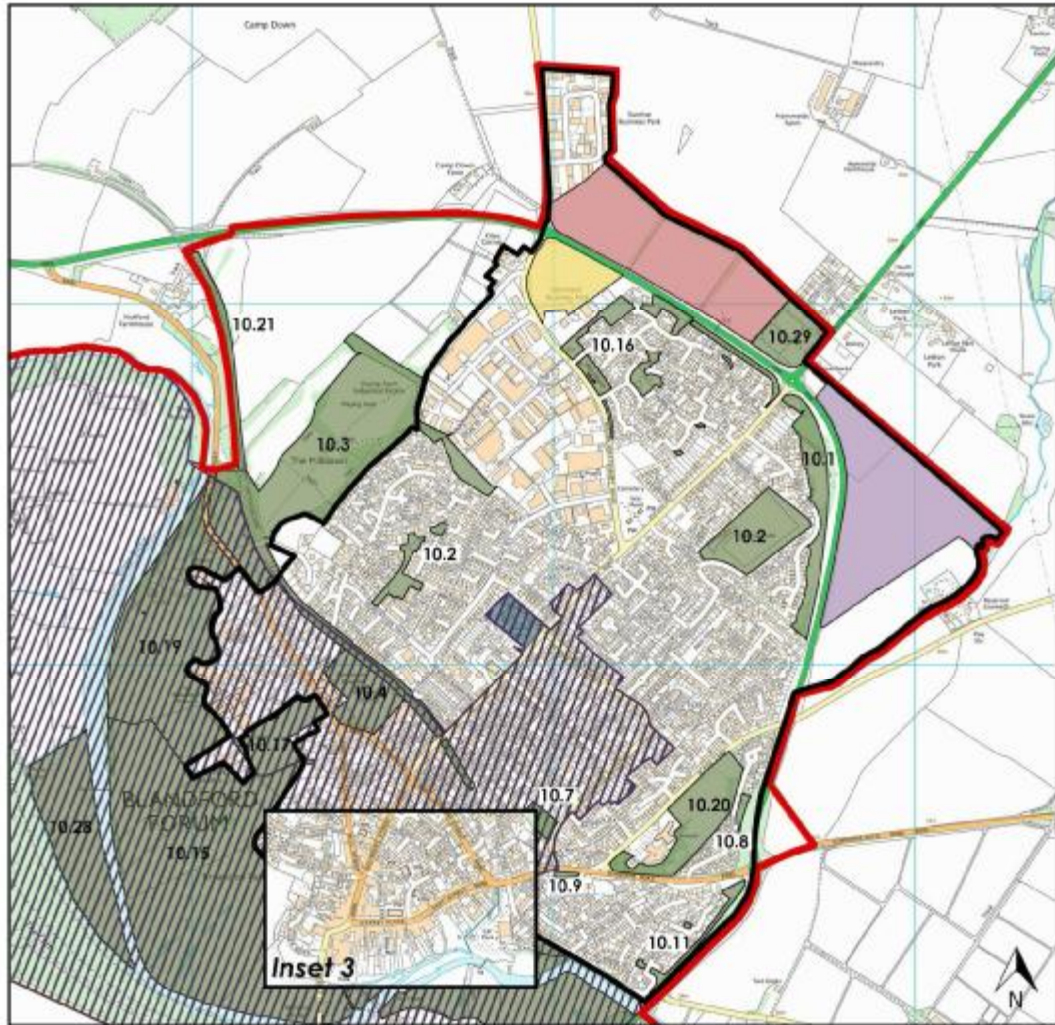
Do you agree the proposed mix of uses for this site? Will the policy ensure that the scheme will be acceptable, especially in terms of its effect on the adjoining AONB and on the local roads?

Policy 4: Land at Shaftesbury Lane, Blandford Forum

Do you agree with this proposal for a smaller food store than the ASDA scheme to serve the local needs of the northern part of Blandford Forum with more land safeguarded for business uses?

4.4.1 These policies are contrary to the spatial strategy proposed by the emerging Local Plan, which are supported by Bryanston (RFE) Ltd.

4.4.2 The proposed settlement boundary shown in the Blandford + Plan stretches beyond that currently outlined in the adopted local plan as shown in Appendix 2 and Appendix 3. Bryanston (RFE) Ltd would like to question the authority of the Neighbourhood Plan to propose such a change, particularly considering that it contradicts the policy direction that is currently emerging, and which is under consideration by the secretary of state (see Appendix 3.). Moreover, there is a question relating to conflict and prematurity as the 'Basic Conditions' dictate that the proposed policies of the Blandford Plus Plan must be in accordance with Local Planning Policy ,which is developed through a more thorough and precise process than the Neighbourhood Plan.



Blandford Plus Neighbourhood Plan

Inset 1 - Draft Plan - October 2015



Figure 3 Blandford Plus Proposals Map for Blandford

4.5 Policy 10: Local Green Spaces

Do you support the provisional list of proposed designations? If there are other areas you feel

should be designated as Local Green Space we would be pleased to hear of these?

4.5.1 Bryanston (RFE) Ltd would like to seek clarity on the actual locations that are being proposed by the Blandford Plus Plan for Local Green Space. Two locations are proposed in the Bryanston Parish area and it is not clear where area 28 (Meadows south of River Stour) is and if it is under the ownership of Bryanston (RFE) Ltd. Regarding the other location proposed (area 28 Bryanston Village Green), we would also like to request a change in the terminology when referring to the area so as not to refer to it as a 'village green' due to the connotations that such a term denotes under planning policy. This would avoid any source of confusion in respect of the purpose and designation of the land.

4.5.2 More generally, although Bryanston (RFE) Ltd are supportive of promoting local green space through the plan, we would like object to the inclusion of private land in this category without prior engagement with its owners.

4.6 Policy 13: Design Principles: Bryanston

Does the policy identify all the important characteristics of the village? If not, what is missing?

4.6.1 The policy explains that development proposals in Bryanston will be supported provided that they have full regard to criteria of design principles, set out within the policy. Bryanston (RFE) Ltd are supportive of the requirement for proposals to be of a '*consistently high standard of design*' and for proposals to reflect the 'scale and character' of the area. It is important to consider the requirement of National Planning Policy as set out in Paragraph 60 of the framework, which states that;

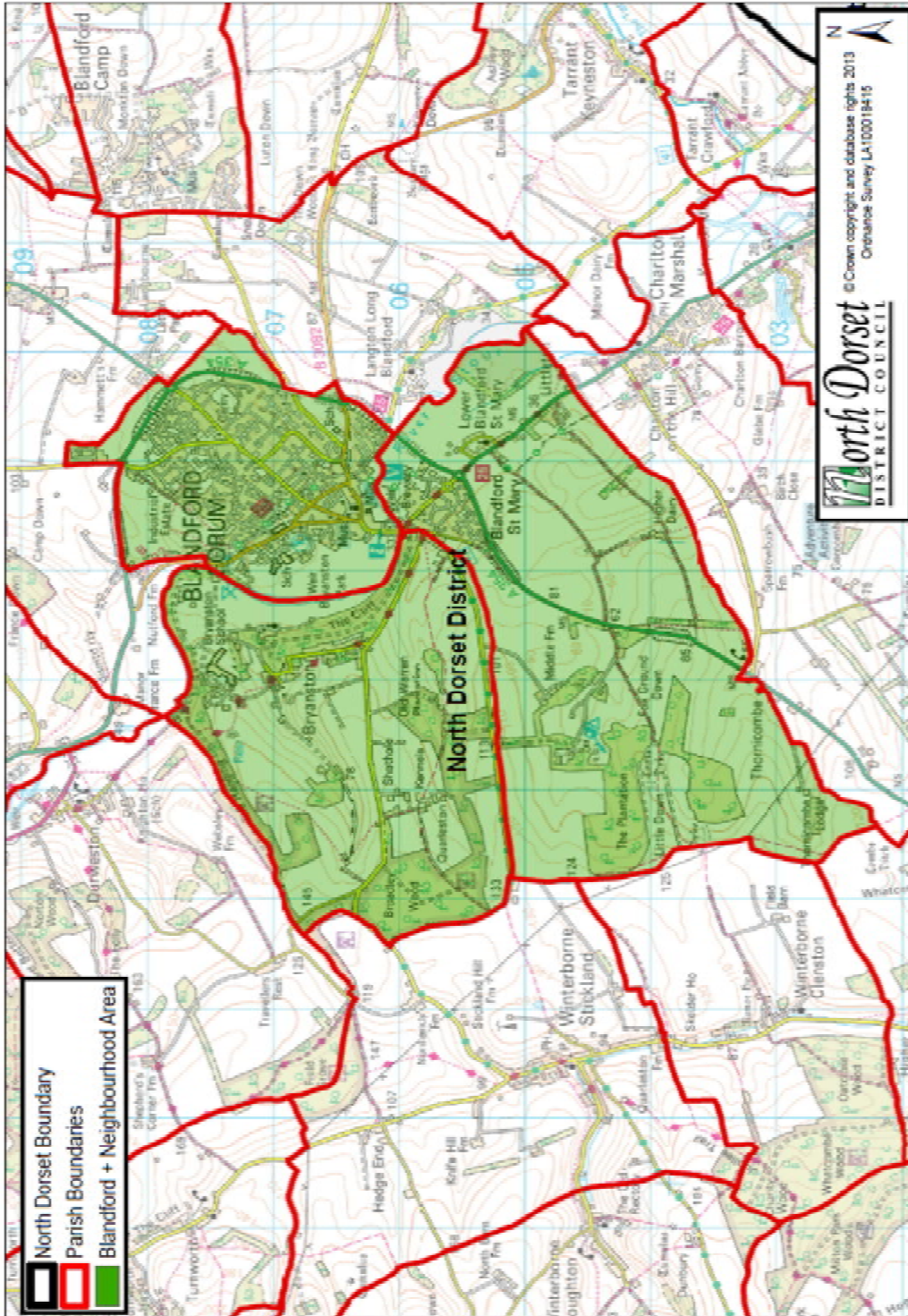
"Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness."

4.7 Policy 14: Local Tourism

Do you support the protection of visitor accommodation and the proposals to allow a change of use from residential to bed and breakfast accommodation?

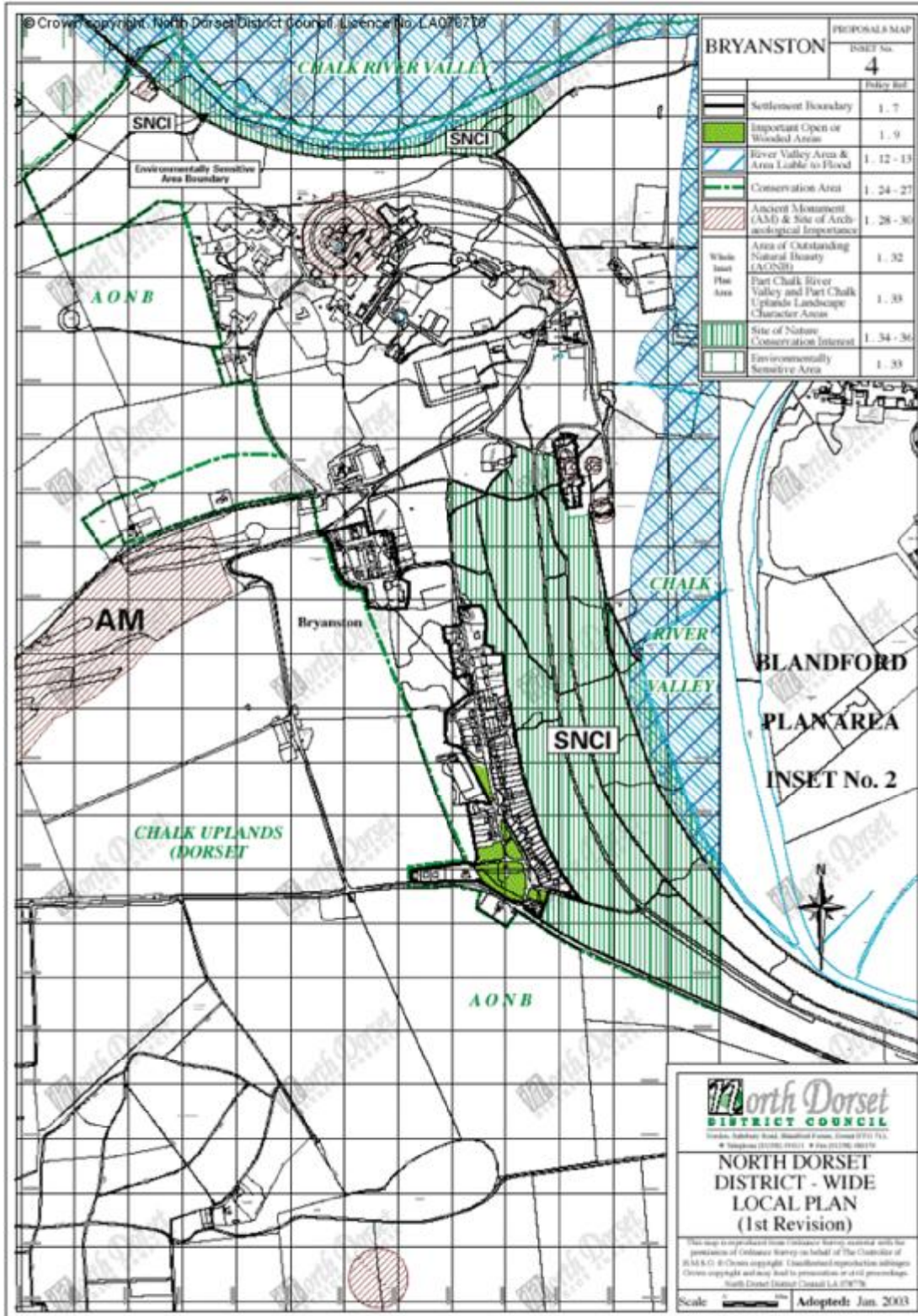
4.7.1 Bryanston (RFE) Ltd is supportive of the policy as it is in accordance with National Planning Policy to support a diverse rural economy. The Estate is always exploring ways to diversify and policy 14 will assist in providing alternative future options for its portfolio.

Appendix 1 – Blandford + Neighbourhood Plan Area



| Name of the neighbourhood area | Blandford + Neighbourhood Area |
|---------------------------------------|--------------------------------|
| Designation date | 17 February 2014 |
| Organisation who made the application | Blandford Forum Town Council |

Appendix 2 – Adopted Local Plan Bryanston Proposals map



Appendix 3 – Adopted Local Plan: Blandford Forum Proposals map

