

**The Town Clerk's Office**  
**Church Lane**  
**Blandford Forum**  
**DT11 7AD**

Dear Sir

***Blandford+ Neighbourhood Plan 2015-2031***  
***Pre-Submission Plan Bryanston***  
***RESPONSE TO PUBLIC CONSULTATION***

These comments are made with specific reference to the emerging proposals for Bryanston, set out in Blandford Policies Map Inset 4, and in response to the recent notification we received.

My wife and I own 56 New Road, Bryanston DT11 0DR (purchased in December 2014) and therefore have a direct interest in the Bryanston proposals.

We understand that before the Neighbourhood Plan can be adopted it has to:

- go through this formal consultation process
- be finalised
- be examined by an independent examiner, and
- gain a majority of votes in a referendum of the local electorate.

***Policy 7 - Housing to Meet Local Needs, Bryanston***

***The Principle of 4 Land Parcels for 10 New Houses:***

Blandford Policies Map Inset 4 indicates 4 parcels of land for 10 houses, and the policy proposes support provided:

- i 10 dwellings in total – 2 per parcel except the southernmost parcel on The Cliff that can have 4;
- ii minimum of two parking spaces / dwelling;
- iii at least 2 of the parcels should be dwellings for local households wishing to downsize to a 2 bed, or for self-build;

- iv proposals include a planning obligation to make a financial contribution which, jointly, meet the full cost of new / enhanced community facilities for the parish;
- v design meets requirements of Policy 13.

Policy 7 responds to adopted **LPP1 Policy 20: The Countryside** which states:

*"...Development in the countryside outside the defined settlement boundaries will only be permitted if ...  
b for any other type of development, it can be demonstrated that there is an 'overriding need' for it to be located in the countryside..."*

Adopted **LPP1 Policy 6: Housing Distribution** also states:

*"...In the countryside ... the level of housing and affordable housing provision will be the cumulative number of homes delivered to contribute towards meeting **identified local and essential rural needs...**"*

Comment:

Bryanston Village, although an integral part of the designated Blandford+ Neighbourhood Plan area, is now formally designated 'countryside' as it is not within a settlement boundary.

The identified land parcels are all owned by the Bryanston RFE limited.

Whilst it may be possible to demonstrate "**overriding need**" and identify "**...local and essential needs...**", this may well be difficult to justify when Blandford Forum, an identified growth point for at least 1,200 houses to 2031, is within 1 mile of Bryanston.

Comment:

The primary justification for Policy 7 is the requirement to pay financial contributions (for the full costs of providing new or enhanced community facilities for Bryanston).

It is assumed that if an essential local housing need is proven that the argument is for low cost social or affordable housing. Charging financial contributions for such housing would appear to conflict with the Government and the District Council's stance on such housing, where the whole intention is to make housing more achievable / affordable. This form of housing would normally be exempt from such planning obligations or Community Infrastructure Levy (which would be in place by the time the Neighbourhood Plan was adopted).

The Policy refers to self-build projects, which would certainly benefit from the Government's CIL exemption.

Thus the basic premise for such financial burden appears to be flawed and is considered to be unacceptable.

### ***The 4 Housing Sites in Bryanston***

The explanatory text to Policy 7 suggests that the 4 housing sites might be justified on the basis that they would:

1. tidy sites, such as the garage, and other parts of the village; and
2. provide community facilities;

in response to strong consultation response.

The landlord, Bryanston RFE Ltd, has confirmed the availability of the sites, and also that of the proposed community facility land (albeit, not stated in the Plan). The Policy 7 text states that the parcels are currently vacant, and do not make a significant contribution to the character of the Conservation Area.

### **Comment:**

Policy 7 is misleading in that the 4 parcels comprise:

- the well-used private gardens of 57 and 58 New Road (even if this were acceptable in infill and street impact terms, it would result in the loss of two well-used private gardens) ;
- the mature garden space at the side of 33 The Cliff forms part of the Conservation area character;
- the current business site of Phillips Fabrications (next to 67 The Cliff), which provides the sole employment for the tenant, a family-run business that has operated for many years, and provides a historic link to the second world war army camp on this part of Bryanston;
- a triangular-shaped piece of land that functions as the side garden of 35 The Cliff.

The development of these sites would therefore appear to raise a number of issues:

- loss of garden space that is actively used by the tenants;
- loss of trees;
- loss of employment;
- increased traffic impact to the rear of Nos 33, 34 The Cliff and 57 and 58 New Road; and
- the resultant detrimental impact on the character or appearance of this part of the Conservation area.

If the proposal at 33 The Cliff were accepted to facilitate new housing (and assuming, of course, that there was a proven need) then this would lead to the loss of trees of special amenity value in the Conservation Area. If such a premise were accepted then why would other sites along The Cliff provide alternative options? With minimal removal of some trees, and no loss of private gardens, the following sites might, for example, be equally appropriate housing sites:

- adjacent to 62 The Cliff;
- on the opposite side of the rear access road to 1 Ashwood Row;
- opposite Little Monnington.

***Policy 13: Design Principles: Bryanston:***

*Comment:*

This policy would provide an appropriate basis for determination of planning applications in Bryanston Conservation Area, with or without the proposed additional housing sites. The policy acknowledges the retention and protection of trees, and other open areas, which throws further doubt on the suitability of the proposed housing sites.

The majority of responses in the recent residents' survey stated that they did not want any additional housing in the village.

However, appropriate regard should be had to the LPP1 Policies 24 (Design), 28 (Existing Dwellings in the Countryside) that acknowledge traditional or contemporary design, subject to size and design respecting the setting, and the character and appearance of the immediate locality.

*Concluding Comments:*

In truth, none of the proposed housing sites, or the alternative suggestions above, would seem to be appropriate, in the absence of any proven need. This must be the key consideration to allocating any such additional housing land in Bryanston Conservation Area.

Whether this could be justified for the purposes of this part of the Neighbourhood Plan remains to be seen. The siting of Bryanston so close to the principal settlement of Blandford, with its agreed substantial expansion programme enabled by the adopted Local Plan, would present a very difficult case to argue.

Yours faithfully