



SIMON HOARE MP
NORTH DORSET

HOUSE OF COMMONS
LONDON, SW1A 0AA

2nd March 2023

Ms Cassandra Low
Room 3C
The Planning Inspectorate
Temple Quay House
2, The Square
Bristol BS1 6PN

By post & email (west2@planninginspectorate.gov.uk)

Dear Mr. Low

Ref: APP/D1265/W/22/3310636, Bryanston (RFE) & The Rothermere Foundation

I make this submission as the Member of Parliament for North Dorset which contains Blandford Forum and the site subject to the above Appeal. I hope that the Appeal will be dismissed and costs awarded in favour Dorset Council. Prior to election I worked in the planning and development sector. I highlight this in order to dismiss any suspicion that this is merely a NIMBY reaction to the proposal. It is not.

The fact that RFE wish to do something to help refugee Ukrainian families is to be applauded. Given the horror of that situation any act of philanthropy should be judged on its merits. I do not believe that this proposal is motivated by philanthropy. If it were, the Foundation could have purchased any number of homes in which to house Ukrainians. It would have been a much speedier mechanism to achieve the aim. Perhaps I am being overly cynical to reflect that the Appeal site has already been through the planning process for residential development and was, perfectly correctly, refused. Is this proposal therefore a Trojan Horse, seeking to accrue established land use arguments to augment a flimsy case for any development to take place on this site? While not germane to the planning process per se, it does merit passing reflection. I would also contend that the premature and aggressive act of an Appeal on the grounds of Non Determination also throws light on the modus operandi of the Appellant. Were a truly local solution being sought to a problem the Appellant should have worked in concert with the Planning Authority, Blandford Forum Town Council, the Home Office and others.

Working Hard for North Dorset

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Let me now turn to policy/planning/Government policy which I am content justifies dismissal of the Appeal:

1. The whole thrust of Government policy has been to house, often very distressed, anxious and exhausted refugees in family and community settings. This presents the obvious opportunity for pastoral care, integration and support. The creation of a linked to nowhere caravan ghetto achieves none of these policy aims;
2. It is specious to attempt to place any weight on Policies 26 and/or 31 of the North Dorset Local Plan Part 1 (2016). These policies cover the provision of Gypsy & Traveller and Show people sites. These groups of people have identified and particular characteristics hence the need for policy to make provision for their needs. Fleeing war, displaced refugees do not by any measure fall within this category or definition. Policy also covers the provision of tourist accommodation. Unless the Home Office has fundamentally changed the definition (it has not) then a war fleeing refugee cannot be described as a tourist;
3. In point 1 above I used the word ghetto. I did not do so flippantly but as a heartfelt expression of what would be created. We have neither history nor policy to sustain the creation of housing (permanent or temporary) by designation to a specific nationality. It is the planning version of Apartheid. The proposed use of the Appeal site to create temporary, racially segregated housing is not supportable. Given recent attacks on asylum seekers' accommodation I do not believe it would be a safe or sensible proposal to create a designated and easily identifiable target for racist extremists;
4. The location of the Appeal site is not appropriate to meet the often complex needs of Ukrainian refugees;
5. The Appellant's flood risk is flawed and without foundation. Flood Risk Assessments must cover the entirety of a site and its division into zones with no proposed flooding attenuation is incorrect. Caravans within the development enveloped would be left a medium or high risk of surface water flooding. While caravans are raised it would leave vulnerable refugees stranded in an archipelago of water surrounded 'caravan-islands'. This would be intolerable;
6. Para 202 of the NPPF is important. The harm to an important heritage asset (Bryanston School) needs to be weighed against the benefits of the proposal. Having studied the application I do not believe that the merits of the proposal (and these of themselves are dubious) outweigh the harm to the heritage asset;
7. The impact on landscape cannot be dismissed. It is germane to the determination of this Appeal. The proposal does not protect or enhance the valued landscape of the River Stour Meadows. The proposal has no sensitivity in terms of location or design. I am of the judgement that significant harmful and adverse impacts would accrue on both the Conservation Area and the AONB. I do not believe that these adverse impacts could be mitigated against;



8. The late submission to Dorset Council of further ecological survey works serves to underscore the prematurity of this Appeal on the grounds of Non Determination. Given the importance of ecology in local and national planning policies the application was not in a position to be determined by the Planning Authority given the gaps in the ecological survey work. Again, this can only point negatively towards the ambitions and motivations of the Appellant. I urge the Inspectorate to give careful and detailed consideration to the potentially irreversible ecological impacts of this proposal;
9. Given its location I do not believe this site to be sustainable, when assessed against any sustainable planning criteria for development purposes.

In conclusion there are clear and compelling planning reasons to dismiss this Appeal. I have endeavoured to set them out above. Alongside those are I believe even stronger societal and Government policy ones. The UK has, is and will provide a range of supports to Ukraine as Putin's aggression is repelled and defeated. The creation of segregated, isolated, racially distinct accommodation has not, is not and will not be part of that response. It would be a disservice and offensive to our Ukrainian friends and allies to create a caravan ghetto. We welcome them with our hearts and our love not a parcel of land, divorced from the community and already deemed inappropriate for residential development.

Should an opportunity present itself for me to present my case to you, I hereby express my willingness to avail myself of it. My constituents are opposed to this proposal too. Not for reasons of NIMBYism or hostility to foreigners but because they know it to be wrong both in planning and human terms. I hope it is clear that I share those views. **I urge you to dismiss the Appeal and award costs.**

I look forward to hearing from you and would be grateful if you could acknowledge safe receipt of this submission (simon.hoare.mp@parliament.uk)

SIMON HOARE MP
Member of Parliament for North Dorset