

HAZELBURY BRYAN NEIGHBOURHOOD PLAN 2018 to 2031

Submission Consultation (10 August to 21 September 2018) – Summary of Representations

Rep #	Respondent	Summary
HB01	Andrew Coombs	<p>I have lived and worked in and around Hazelbury Bryan and have followed the progress of the Neighbourhood Plan with interest. I would like to place an objection to Site 2 being removed from the list of sites selected on the Plan. I have regularly noticed car parking congestion at the Village Hall with cars on occasion needing to reverse onto the road and also cars generally parking haphazardly when using the hall due to lack of parking. The removal of Site 2 prejudices the delivery of this much needed car parking provision which would have supported HB22 (Parking Provision). Site 2 offers the delivery of much needed affordable housing in the village and the community charge benefits of the site would support HB14 – Community Facilities. The removal of Site 2 loses the benefit of a new footpath link between Pleck/Wonston and The Causeway which would have provided a safe route on foot and supported HB14 additional community facility. Lastly, the removal of Site 2 prejudices the delivery of market homes, in a sensitive manner, at the heart of the village in a very sustainable location which could have supported HB15 (Meeting Housing Need) and HB16 (Type of Dwelling). Site 2 should be reinstated to the Plan as a site for development.</p>
HB02	Annette Watson	<p>I have always lived in Hazelbury Bryan and am therefore very interested in how decisions put forward by the current Neighbourhood Plan could potentially shape the village in the future. Having given it due consideration, I object to Site 2 being removed from the list of sites going forward on the plan. I have observed there to be an issue with car parking availability for hall users on numerous occasions which is evidenced in section 8.9 of the plan. The removal of Site 2 would adversely impact on the delivery of this much needed additional car parking provision which would have supported HB22 (Parking Provision). Removing Site 2 takes away the benefit of a new footpath link between The Causeway and Pleck/Wonston which would have led to a safer route on foot and supported HB14 (Community Facilities). The removal of Site 2 prejudices the delivery of affordable housing in the village, for local people, and the community charge benefits will also be lost therefore another impact on HB14. In addition, the removal of Site 2 has an adverse effect on the delivery of much needed market homes, at the heart of the village in an especially sustainable location which could have supported HB15 (Meeting Housing Need) and HB16 (Type of Dwelling). Site 2 should be included as a site for development in the current Plan.</p>

HB03	David Mitchell	<p>The objection relates principally to the housing needs assessment methodology and outcome. The qualifying body has failed to demonstrate that the assessment is robust and truly meets the housing needs of Hazelbury Bryan for the duration of the plan period. The assessment erroneously takes account of previously approved housing permissions and is considered to not meet future housing need having regard to the overall level of housing need for North Dorset District. The housing needs assessment is crude and does not accord with recent Government guidance related to housing needs assessments. The qualifying body has failed to demonstrate that proposals for affordable housing are robust and deliverable. The two proposed major housing development sites – Sites 7 and 11 – involve the loss of employment space. The qualifying body has failed to demonstrate that the loss of employment space is justifiable and backed up by up to date evidence. The proposed plan therefore fails to meet the Basic Conditions under the Localism Act.</p> <p>The objector is the owner and promoter of site 20 and considers that the site presents a viable and deliverable alternative option to deliver market and affordable housing together with a range of much-needed community benefits. These were clearly detailed in the Site Assessments Report which stated:-</p> <p>-Provision of affordable / starter homes – Benefit to the School of extra playing fields – Benefit to the Church and School of additional parking - Benefit to the community of cemetery extension, car park and open space (score 2)</p>
HB04	Dorothy Hannam	<p>I would like to voice my objection to Site 2 being removed from the selected sites going forward on the Hazelbury Bryan Neighbourhood Plan. I have always lived local to Hazelbury Bryan, living and working within the village for twenty-five years. This has provided me with a sound understanding of the issues and needs occurring within the village and surrounding area. The removal of Site 2 prejudices the delivery of affordable housing in the village which can be harder to acquire through brown field sites. The community charge benefits which Site 2 would generate would also be lost (an impact on HB 14, Community Facilities). Site 2 offers a unique opportunity to provide much needed car parking for the Village Hall which would resolve the current unacceptable situation of congestion, particularly at peak times (HB 8.9), making the area safer and more accessible for all users. The Village Hall is the main community building in the village, which was extensively refurbished and modernized in recent years and is in frequent use. To remove Site 2 prejudices HB22 (Parking Provision) which is required now. The removal of Site 2 takes away the benefit of a safe footpath link from either end of the village i.e. The Causeway to Wonston and Pleck. This is an additional impact on HB14. Lastly, the removal of Site 2 prejudices the delivery of much required market homes in a highly sustainable central village location, sensitively delivered. I note it is sometimes easier to put houses straddling the outskirts of a village but this takes away from the very heart of the place. Site 2 should be included as a site for development in the current Plan as it offers undoubted benefits to the community.</p>
HB05	Dorset County Council Flood Risk	<p>Standing advice - Neighbourhood Planning Advice for Managing Surface Water What can you achieve within a Neighbourhood Plan to improve surface water management from new development sites? The Neighbourhood Planning process is an ideal opportunity to shape new development in a positive manner. Through the Plan you are able to include drainage knowledge, issues that affect your area and specify policies to affectively influence the management of surface water from new development. Flood risk and resilience to climate change can be planned through Neighbourhood Plans. By highlighting local flooding problems and developing policies for land use, a community can manage and reduce the risk of flooding. In addition, water can be used as a resource to enhance biodiversity, beauty, tranquillity, places and</p>

		<p>landscape. A Neighbourhood Plan should incorporate evidence from the community to provide safe, sensible and sustainable development that prevents flooding by:</p> <ul style="list-style-type: none"> • Providing local knowledge about drainage and historic flooding including, for areas worst hit by flooding, flood depths & flow paths as well as causes and impacts. • Identifying, within any proposed development sites, whether there are any low spots that are regularly wet and should be considered within the landscaping and/or built elements? • Considering mitigation measures to be included within future development proposals. Any development should mitigate against existing flooding problems and any potential future flooding. • Specifying that surface water should be managed above ground level so any future blockages in the drainage system can be easily visually identified. • Ensuring surface water management considers amenity value. • Supporting drainage systems that mimic the landscape and natural flow paths. • Ensuring runoff rates are well managed when flowing into sensitive drainage systems and identifying downstream constraints which have proven problematic in the past. • Detailing potential solutions or improvements to infrastructure within your community that may help reduce flood risk, which could be part funded by developer contributions through the CIL (Community Infrastructure Levy). You can check the current mapped areas of risk identified on the Strategic Flood Risk Assessment on explorer.geowessex.com/SFRA. Please do not assume an area locally known to flood will be appropriately represented on national scale strategic maps. Areas of known flood risk presented within the Neighbourhood Plan can help steer development to areas of lower flood risk. <p>Example of neighbourhood plans with flooding outlined and policies: A good example with policies to reduce flooding: http://www.muchwenlock-tc.gov.uk/wp-content/uploads/2016/04/Much-Wenlock-Neighbourhood-Plan201326-Adoption-Version.pdf An example where local areas of risk are identified: https://www.bereregisparishcouncil.co.uk/berepc/files/Bere-Regis-Plan-21.06.18-Consultation-Doc.pdf Further relevant Information:</p> <ul style="list-style-type: none"> • National Planning Policy Framework (Page 23-26, paragraphs 99-104, 109) • Planning Practice Guidance – Flood Risk and Coastal Change • Non-statutory technical standards for SuDS • BS 8582 Surface water flood risk management • Designing for exceedance in urban drainage - good practice (C635) • The SUDS manual (C697) • Sewers for Adoption 7th Edition
HB06	Highways England	<p>Thank you for providing Highways England with the opportunity to comment on the submission version of the Hazelbury Bryan Neighbourhood Plan. As you are aware, we are responsible for operating, maintaining and improving the strategic road network (SRN) which in this case consists of the A303 and A35 which pass some distance to the north and south respectively of the plan area. We are satisfied that the proposed plan policies are unlikely to result in development which will impact on the SRN and we therefore have no comments to make. This does not however prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.</p>
HB07	Historic England	<p>Many thanks for your Regulation 16 consultation on the Hazelbury Bryan Neighbourhood Plan. I can confirm that there are no comments on the Plan that we wish to submit. Please find attached our response to the Regulation 14 consultation. Thank you for your Regulation 14 / Pre-submission consultation on the Hazelbury Bryan Neighbourhood Plan. Previous advice from us in response to earlier consultations on the preparation of the Plan has concentrated on the need for evidence to demonstrate that proposed site allocations can be delivered without causing harm to heritage</p>

		assets. Having considered the Plan and its supporting evidence I can now confirm that we have no objections to the site allocations (housing and employment) proposed. Otherwise, we are particularly impressed by the degree of analysis of the Plan area's distinctive historic character and how this has informed the regime of locally specific policies (HB5 – 12). There are few Plans that we see which move beyond the promotion of generic policy in this respect and yours is therefore notable for the detailed level of evidence which has been gathered and applied. Our only observation is whether the General Design Principles set out in Table 3 (p22) would themselves benefit from the added materiality which policy status could afford. Overall, we congratulate your community on its progress to date and wish it well in the making of its Plan.
HB08	Ian Watson	As a resident of Hazelbury Bryan, I would like to express concern over the removal of Site 2 from the Neighbourhood Plan. This is a site which offers much needed benefits for the village. There is currently very limited parking availability for hall users which leads to congestion issues especially at peak times evidenced in section 8.9 of the plan. The removal of Site 2, would impact on the delivery of this crucially needed additional car parking provision which would have supported HB22 (Parking Provision). Omitting Site 2, loses the benefit of a new footpath link between The Causeway and Pleck/Wonston which would have provided a safe route on foot and supported HB14 (Community Facilities). The removal of Site 2 prejudices the delivery of affordable housing in the village, and the community charge benefits will also be lost. I also feel strongly, the removal of Site 2 poses an adverse effect on the delivery of much needed market homes, in a central village location. Site 2 should be included as a site for development in the current Plan.
HB09	Julie Coombs	I grew up in Hazelbury Bryan attending the village school and using the amenities such as the Village Hall on a regular basis therefore I feel it necessary to make the following comment. I object to Site 2 being removed from the list of sites going forward on the plan. There is a current issue with car parking availability for hall users as expressed in 8.9 of the plan. The removal of Site 2 prejudices the delivery of this much needed additional car parking provision which would have served to support HB22 (Parking Provision). The removal of Site 2 loses the benefit of a new much needed key footpath link between The Causeway and Pleck/Wonston which would have served as a safer route on foot and supported HB14 (Community Facilities). The removal of Site 2 prejudices the delivery of much needed affordable housing in the village and the community charge benefits will also be lost therefore additional impact on HB14. Finally, the removal of Site 2 prejudices the delivery of much needed market homes, in a sensitive manner, at the heart of the village in a highly sustainable location which could have supported HB15 (Meeting Housing Need) and HB16 (Type of Dwelling). Site 2 should be included as a site for development in the current Plan as it offers undoubted required benefits to the community.
HB10	Messrs Hannam	I am writing on behalf of Mssrs Hannam, who control land at Partway Lane, Hazelbury Bryan. We understand that the Hazelbury Bryan Neighbourhood Plan has been submitted to North Dorset District Council ahead of its examination and it is currently being publicised. The examination will focus on whether or not the plan complies with the 'basic conditions', as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. The basic conditions are: a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). b) the making of the order (or neighbourhood plan) contributes to the

		<p>achievement of sustainable development. c) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). d) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations. e) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan). We believe that the plan as submitted fails to meet the basic conditions. We also believe that the submitted plan does not accord with paragraph 16 of the NPPF, which states that plans should: a) 'be prepared with the objective of contributing to the achievement of sustainable development; b) be prepared positively, in a way that is aspirational but deliverable;...' The plan, as submitted does not achieve sustainable development and it is not deliverable. Land at Partway Lane By way of background, the Council will be aware of the current live outline planning application to deliver 13 new homes at my clients' site, as well as community benefits in the form of additional village hall parking and providing a new footpath link (application ref. 2/2018/0339/OUT). The application was validated by the Council in March 2018. Although currently undetermined, consultee responses from the Highway Authority; Lead Local Flood Authority; Dorset County Council Natural Environment Team; North Dorset Group of the Ramblers; and Dorset Rights of Way all offer no objections to the scheme, highlighting its deliverability. The application was informed by the findings of the emerging neighbourhood plan, which identified the site (known as 'Site 2') in the October 2017 options consultation as a potential allocation. We wrote in support of the site, supplementing the representation with topographical, arboricultural, flood risk and ecological surveys, reinforcing its deliverability. The subsequent neighbourhood plan update¹ published by the Parish Council on 07/11/17 confirmed that it was one of the plan's preferred sites, subject to the provision of public benefits in the form of additional village hall parking and a footpath link. This led to the Parish Council writing to my clients to state that the site had been shortlisted by the Neighbourhood Plan Group. A masterplan was prepared and submitted to the Parish Council to show the potential future layout and the delivery of community benefits. The pre-submission version of the plan was then published in April 2018, by which point my clients' planning application was well-known in the village. My clients were understandably disappointed to find that the pre-submission plan relegated the site to the position of a reserve site and a consultation response was submitted on behalf of my clients to the Parish Council. This expressed serious concerns over the deliverability of proposed allocations and highlighted fundamental errors and discrepancies in the SEA, which questioned the compatibility of the pre-submission plan with the basic conditions. We find that these concerns have not been addressed in the submitted plan. Basis for objection You will find appended to this representation my clients' previous representations submitted to the Parish Council in respect of the 2017 options consultation and 2018 pre-submission consultation, as well as correspondence from the Parish Council confirming the preference for the site. When my clients' representations are read in conjunction with the submission plan, it is clear that the concerns raised have not been addressed. I would urge officers and the examiner to take the points previously raised into account, as they are still wholly relevant. Rather than repeating those points here, this representation instead focusses on additional concerns now arising from the submission version of the plan. The plan's evidence base includes a comprehensive Services and Amenities paper. This summarises the facilities and services found in the parish, as well as sets out where there are shortfalls in provision. Two particular shortfalls of relevance are the clear need for a new public footpath to connect to an existing right of way and additional village hall parking. Taking the first, figure 10 of the submission plan, titled 'community buildings and curtilage, key footpaths and proposed new links', includes a proposed link through my clients' land. This is also shown on the proposals</p>
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HB11	Messrs Willaimson-Jones	<p>I am writing in response to your current Regulation 16 consultation on the submitted Hazelbury Bryan Neighbourhood Plan. I act on behalf of Messrs David and Andrew Williamson-Jones in representing their land interests in Hazelbruy Bryan at 'The Ferns' Kingston and land at Pleck Farm, Coney Lane. Attached with this response is a copy of our representation submitted in response to the Hazelbury Bryan Neighbourhood Plan pre-submission Regulation 14 consultation. The comments outlined in that representation remain largely relevant as our response to the submission plan although we note the following: • We welcome the correction to the supporting text regarding viewpoint V2 and the clarification that the important view is orientated to the south east along Military Lane. • We welcome the adjustment to the defined gap policy boundary which has been amended to exclude all existing buildings and hardstanding at Pleck Farm, Coney Lane but we do not think this has gone far enough. We maintain the view that some additional land could be excluded from the gap policy as set out in our Regulation 14 representation to enable some small scale expansion to the existing employment land use, also recognised in the Neighbourhood Plan, without undermining the intention of the gap policy to prevent coalescence of the settlements of Partway and Wonston. • We maintain our objection to the specific reference to the expansion of the Chicken Shed at Pleck Farm, Coney Lane, Wonston, even as amended. It is not necessary to cite specifically the expansion of this site and make judgements such as "it is unlikely to be supported". This should be left down to the planning judgement based on the individual merits of any proposal that might be submitted. Our previous comments submitted at Regulation 14 remain relevant even taking account of the suggested amendment to</p>

		<p>the text. In summary we support the general approach of the Neighbourhood Plan to existing employment sites but raise objection to specific textual matters regarding the expansion of the existing employment site at Pleck Farm, Wonston and consider the important gap in this area should be redrawn to include scope for future expansion of the existing lawful employment use on the site. We raise objection however, to the draft Neighbourhood Plan as we consider that the housing needs are no longer in accordance with increases expected in the near future, that the pro-rata distribution is an unsound basis for establishing the number of houses Hazelbury Bryan should be planning for and the general approach to site allocations for residential development and employment is inappropriate and does not select the most suitable sites. Furthermore, we consider that land to the north west of the Chicken Farm, to Military Road, Kingston (site 18) should be reconsidered for allocation as an alternative to other unsuitable sites currently selected. If the Neighbourhood Plan does proceed with the existing site allocations, site 18 should be seriously considered as an additional site to assist with meeting the increasing housing needs in the district which translates to increased needs in Hazelbury Bryan. The PPG sets out the basic conditions required of a Neighbourhood Plan before it can be put to referendum and these are that; • Having regard to national policies and advice contained within the guidance issued by the Secretary of state it is appropriate to make the Neighbourhood Plan; • the making of the Neighbourhood Plan contributes to the achievement of sustainable development; • the making of the Neighbourhood Plan is in general conformity with the strategic policies contained within the Development plan for the area of the authority. As a result of the concerns raised relating to the housing policy in the Neighbourhood Plan with respect to its overall numbers and its approach to pro-rata distribution, the clear indication in national guidance that evidence informing the Local Plan process is likely to be a relevant consideration of the basic conditions and the Neighbourhood Plans failure to consider increasing housing requirements under the Local Plan Review, we suggest that the Neighbourhood Plan fails to meet the basic conditions. Specifically that the Neighbourhood Plan fails to have regard to national advice contained within the PPG and the plan would not contribute to the achievement of sustainable development as it would fail to plan for the increasing housing requirements. Attachment – Copy of Messrs. David and Andrew Williamson-Jones’ representation to the draft Hazelbury Bryan Neighbourhood Plan Regulation 14 Consultation – see website (available via: https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/hazelbury-bryan-neighbourhood-plan.aspx).</p>
HB12	Natural England	<p>Consultation Hazelbury Bryan Neighbourhood Plan 2018 to 2031 Reg 16b Thank-you for your consultation on the Hazelbury Bryan Neighbourhood Plan. We are pleased to see our previous recommendations have been incorporated into the NP and have no further comments to make.</p>
HB13	North Dorset District Council	<p>North Dorset District Council (NDDC) welcomes receipt of the submission version of the Hazelbury Bryan Neighbourhood Plan. The Council is aware of the various consultation events held within the local community to identify issues and draw conclusions etc and in this context seeks to provide constructive comments on the finalisation of the Plan. For ease of reference, comments are set out according to the policies of the submission version of the neighbourhood plan. Some comments may cover more than one topic and should be seen in this context. The comments made in this response should not be seen as exhaustive and the officers continue to encourage an on-going dialogue with the Neighbourhood Plan Group and the Qualifying Body. General Comments: The submission version of the Plan appropriately seeks to deal with issues of a local nature including the built and natural environment, the local economy and proposed allocations to</p>

		<p>meet local housing needs. Detailed Comments: Paragraph 7.51 and Figure 11 Paragraph 7.51 of the plan reads as follows: 'The settlement boundaries have not been amended to accommodate the greenfield site-specific allocations, as the exact settlement boundary is better established once the developments are built-out (and can be done at the next review of this Plan or through the Local Plan Review).' However, Figure 11 (Proposed Housing Sites and Existing Employment Site) in the plan includes the sites allocated for housing within the settlement boundaries. Consequently, it is considered that paragraph 7.51 of the plan should be deleted. Policy HB15. Meeting Housing Needs – Amount and Location of New Dwellings This policy states that 'Provision is made for up to 52 dwellings to be built in Hazelbury Bryan between 2018 and 2031...'. The policy goes on to detail that at May 2018 a total of 30 dwellings had been consented planning permission within the neighbourhood plan area. Furthermore, the policy allocates sites for up to 26 dwellings. Consequently, the wording of the first line of the policy should be amended so that it reads 'Provision is made for up to 56 dwellings to be built in Hazelbury Bryan between 2018 and 2031...'.</p>
HB14	Paul Dance	<p>With the housing land shortage in North Dorset as whole The Plan should be allocating more housing land adjoining the development boundaries. Extend the boundary to include 1. The land adjoining the shop at The Causeway 2. Land at Muston Lane, Wonston 3. Any other land in a suitable location.</p>
HB15	Wessex Water	<p>Wessex Water provide water and sewerage services to the Hazelbury Bryan Neighbourhood Plan area. We have existing operational assets, which include the Sewage Treatment Works (374601,109361). It is likely that within the plan period we will need to undertake maintenance and improvements works to our existing assets. Such works are essential to deliver a reliable service and meet environmental requirements. In response to development requirements, we may also need to construct new above ground infrastructure during the plan period. As a statutory undertaker, some works are permitted development, but certain works will require us to seek express planning consent from the Local Planning Authority. The design policies under HB5 – HB12 should recognise that infrastructure development and maintenance by utility companies by its nature needs to be functional and considerations such as security and health and safety must take precedence over appearance. While we seek to ensure design is as sensitive to its location as possible, there are often constraints on location (due to existing below ground infrastructure), materials (for example requirements to meet national security standards) and size/form (driven by operational requirements). Policy HB13 identifies defined gaps where new buildings, structures and land uses will not be permitted where these would diminish the distinction between the two settlements. As identified above there are often constraints on the location of infrastructure development and there should be greater recognition of this within the plan.</p>
HB16	Nigel Smith	<p>I have just spoken to Mr Ed Gerry and, given the unusual circumstances, he has kindly agreed to forward this to you. During the Regulation 16 period for Hazelbury Bryan's Neighbourhood Plan, I had a one hour meeting with Ed Gerry, Head of Planning Policy, and a telephone call with Penny O'Shea, in order to try to decide whether it was appropriate for me to submit a case against Site 2, as there have been significant procedural issues with this site for the last 10 months. In the end it was decided not to submit, mainly on the basis that I believed you would have (understandably) dismissed my concerns as being irrelevant, as Site 2 had already been withdrawn from the Plan. I also had, and still have, absolutely no desire to get anybody "into trouble" for the sake of it, as Site 2 was already out of the Plan. However, I have</p>

today heard from the North Dorset Planning Committee, and from Ed Gerry, that you are now in fact considering whether both Site 2 and Site 18 should be included in the Plan. This is a hugely significant change for all the developers, landowners and residents who have a stake, either for or against, these sites – and it came as a shock to most of the 20 or so people gathered at Durweston village hall this morning when the news broke at the Planning Committee meeting for The Ferns (Site 18). As such, I now believe it is essential that you are made aware of the procedural anomalies that occurred in the NP site selection process. Over a period of many months I have been liaising with the ministry (MHCLG), and in particular their delegated NP authority “Locality”, to make sure I have not misunderstood anything in the rules and guidelines about site selection, the use of which, among others, is recommended on the North Dorset NP website. I will summarize the main points below: The emphasis in site selection should be on the Site Assessments rather than the public vote – which is the opposite of what our committee did. Locality have a comprehensive guide entitled Site Assessment and Allocation. The clue is in the name – “Site Assessment and Allocation” – the 2 are inextricably linked. In the Introduction it states: “The Site Assessment will provide the evidence that the sites selected are the most appropriate ... At the end, you will have sites that you can demonstrate have been thoroughly and objectively assessed for suitability. You can then allocate the sites in the neighbourhood plan ... [as it] will demonstrate ... the basis on which the decisions were reached.” (unquote) But it was clearly NOT “the basis on which the decisions were reached” in the case of Hazelbury Bryan. Because having completed the Site Assessments, they then held a public vote. And the 6 sites the committee chose to go forward into the draft plan were exactly the ones that had come top in the vote. The results were even openly published as being the public’s “favoured” sites and as their “consensus view”. But the guidance warns against using the public vote in this way. It says: “Simple voting on different options should be avoided ... Asking people to vote for different sites would be difficult to translate into site allocations”; and also “Too much emphasis on the views of local people results in an unbalanced plan”. The committee even admitted in their own Minutes, “We can only work with the data from the questionnaires; we cannot second guess whether people actually understood the consequences of their preferences”! The public vote results had no fewer than fourteen sites whose average scores were closer to “neutral” than to any shade of “For” or “Against”. With such ambivalent scoring, and such a small standard deviation, it was never going to be a credible site-selection method. The government’s Planning Practice Guidance says: “Proportionate, robust evidence must support the choices made”; and elsewhere it says: “Site allocations need to be evidence-based ... [using] clear planning-focused selection criteria” – i.e. the Site Assessments. The committee visited and thoroughly analysed all 26 sites in the village. Site 18 was one of only 4 that met all 5 of their criteria, and yet it was not even considered for the Plan. It’s only problem? – a neutral public vote. Conversely, Site 2 failed to meet 3 of the committee’s 5 criteria, and yet it was much more highly favoured by the committee because of the public vote, despite it also being one of the 14 sites with a score closest to “neutral”. In my view, planning rules and guidelines are there for a purpose – to ensure that outcomes are both sensible and fair to all – and I believe they should be followed. I sincerely hope that, in the interests of fairness, you will take into consideration what I have just said. If so, you will wish to read the evidence in my comprehensive Regulation 16 submission (attached), which in the end was not submitted for the reasons I have explained.

My interest is in Site 2, which was selected for the Plan in November 2017 and remained in the draft until June 2018. During those 8 months, the validity of the site selection process has been endlessly questioned by a group of villagers, and the site was finally removed from the Plan at the eleventh hour. Despite Site 2 not now being in the main document of

		<p>the Plan, it is still mentioned 3 times in the Consultation Summary in the specific context of it being able to be reinstated at any future review. This submission therefore revolves around the following sentence at the foot of Page 7 of the Consultation Summary, and similar on pages 65 and 66: “The main change has been the deletion of the reserve site (Site 2), given ... the ability for the Plan to undertake an early review if deemed appropriate”. To actually mention (3 times) the possibility of a review, months before the villagers have even voted on the first version, seems very odd until you realize that this Plan has been submitted in the full knowledge that 2 of the 4 chosen sites (and over 50% of the housing) have already been refused planning permission, with absolutely no guarantee of successful appeals. It is unlikely they would have used the word “early” review unless they had already expected that some sites would soon fall by the wayside. And in all 3 places where “review” is used, it is only Site 2 that is mentioned, so the implication is that it is still the Reserve site in everything but name. I am well aware that the primary role of the examiner is to check that the Plan meets all the statutory Basic Conditions, and I know that Site 2 is no longer in the main Plan, so this representation is submitted merely as an “observation” rather than an objection. However, this information will now be available to decision makers for the lifetime of the Plan, and it will act as existential evidence if and when there is a future review. Please see Annexes A and B (attached) for Explanations and Evidence (see website). (Available via: https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/north-dorset/neighbourhood-planning/submitted-plans/hazelbury-bryan-neighbourhood-plan.aspx).</p>
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