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# HAZELBURY BRYAN NEIGHBOURHOOD PLAN 2018 TO 2031 Regulation 16 Consultation 10 August to 21 September 2018

# **Response Form**

The proposed Hazelbury Bryan Neighbourhood Plan 2018 to 2031 has been submitted to North Dorset District Council for examination. The neighbourhood plan and all supporting documentation can be viewed on the District Council's website via: <u>https://www.dorsetforyou.gov.uk/planning-buildings-land/planning-policy/north-dorset-planning-policy/local-planning-policy-north-dorset.aspx</u>

#### Please return completed forms to:

- Email: planningpolicy@north-dorset.gov.uk
- Post: Planning Policy (North Dorset), South Walks House, South Walks Road, Dorchester, Dorset, DT1 1UZ

Deadline: 4pm on Friday 21 September 2018. Representations received after this date will not be accepted.

### Part A – Personal Details

This part of the form must be completed by all people making representations as **anonymous comments cannot be accepted.** By submitting this response form you consent to your information being disclosed to third parties for this purpose, personal details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection. Your information will be retained by the Council in line with its retention schedule and privacy policy (<u>https://www.dorsetforyou.gov.uk/privacypolicy</u>). Your data will be destroyed when the plan becomes redundant.

\*If an agent is appointed, please complete only the Title, Name and Organisation boxes to the personal details but complete the full contact details of the agent. All correspondence will be sent to the agent.

	Personal Details (if applicable)*	Agent's Details (if applicable)*
Title	Messrs.	Mr
First Name	David and Andrew	Stephen
Last Name	Williamson-Jones	Clark
Job Title		PlanningAssociate
(where relevant)		
Organisation (where relevant)		Savills
Address	c/o Agent	
Postcode		
Tel. No.		
Email Address		

### Part B – Representation

#### **1.** To which document does the comment relate? *Please tick one box only.*

✓	Submission Plan	
	Consultation Statement	
	Basic Conditions Statement	
	Other Please specify:	

# **2.** To which part of the document does the comment relate? Please identify the text that you are commenting on, where appropriate.

	Location of Text	
Whole document	See detailed comments below and attached in Reg 14 representation	
Section		
Policy		
Page		
Appendix		

#### **3.** Do you wish to? Please tick one box only.

	Support
✓	Object
	Make an observation

#### 4. Please use the box below to give reasons for your support/objection or make your observation.

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 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.

#### 5. Please give details of any suggested modifications in the box below.

Continue overleaf if necessary

6. Do you wish to be notified of the District Council's decision to make or refuse to make the neighbourhood plan? *Please tick one box only.* 

$\checkmark$	Yes
	No

Please use this box to continue your responses to Questions 4 & 5 if necessary

Attachment – Copy of Messrs. David and Andrew Williamson-Jones' representation to the draft Hazelbury Bryan Neighbourhood Plan Regulation 14 Consultation 21 May 2018

Hazelbury Bryan Neighbourhood Plan Group Hazelbury Bryan Parish Council

Submitted by email: <u>hazelburybryanpc@outlook.com</u>





Dear Sir/Madam

I am writing in response to your current Regulation 14 consultation on the pre-submission draft of the 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.

This representation will respond specifically to the following sections of the draft plan:

- Timescales, plan period and future reviews
- Housing
- Location of new housing development (allocations)
- Employment Economic Development Opportunities and Allocation
- Key Rural Views
- Settlement Boundaries and Important Gaps

#### Timescales, plan period and future reviews

The Neighbourhood Plan pre-submission draft sets out the period in which the plan intends to cover, stating that it will run from 2018 through to 2031 in line with the current adopted North Dorset Local Plan Part 1 (LPP1). We are concerned that the proposed timescale for the plan does not cover a sufficient time period covering only 13 years if the plan is made in 2018.

Furthermore, the continued progress of the Neighbourhood Plan in advance of taking account of new housing evidence currently under consideration by North Dorset District Council (NDDC) in its Local Plan Review would be premature and would result in a Neighbourhood Plan under examination that is based upon an out of date Local Plan and out of date housing figures.

NDDC adopted its current Local Plan in January 2016. LPP1 covers the period 2011-2031. The Council is currently undertaking a Local Plan Review at the recommendation of the Inspector who examined LPP1 due to a requirement to take account of new evidence including housing need evidence detailed in the Eastern Dorset 2015 Strategic Housing Market Assessment (SHMA).

In addition to the updated evidence in the 2015 SHMA, the Department for Communities and Local Government's recent consultation document 'Planning for the right homes in the right places: consultation proposals' would see North Dorset's housing requirements rise from 285 dwellings per annum in the current Local Plan to 366 dwellings per annum.

NDDC also publicly announced in the summer of 2017 that due to circumstances beyond the control of the Local Planning Authority it no longer has the 'five year housing land supply' that is essential in controlling planning applications that aren't in line with its adopted Local Plan. It acknowledged that the supply had fallen



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to 3.42 years and because of this reduced supply the national presumption in favour of sustainable development would apply. This announcement also rendered the housing policies in the adopted Local Plan 'out of date' as indicated by paragraph 49 of the National Planning Policy Framework. The Council is at an early stage of the local plan review but nevertheless is planning for a significant increase in the number of houses it is required to deliver as a result of the new housing need methodology that is likely to be imposed by central government in national policy later this year. We believe it would be inappropriate for the Neighbourhood Plan to proceed to submission based on housing figures that are in an out of date local plan and are likely to have increased significantly by the time the neighbourhood plan has been submitted for examination. For these reasons we are of the view that proceeding to submission with the Neighbourhood Plan as currently drafted in the timescales proposed could lead to significant problems in its examination process. It would be wiser to defer submission until the implications of any increased housing requirement in North Dorset can be fully considered by the Neighbourhood Plan Group.

The Local Plan Review is looking at a new plan period running from 2013-2033 but in reality this is likely to be extended during the review period to 2036 to take account of the fact it is unlikely to be adopted before 2021 and the plan should cover a 15-year time horizon. It is suggested that the Neighbourhood Plan takes this opportunity to consider aligning with the plan period of North Dorset's Local Plan Review to 2033.

#### Housing

The draft Neighbourhood Plan sets out in Policy HB15 within section 9: Housing that it will make provision for up to 52 dwellings to be built in Hazelbury Bryan. We object to Policy HB15 on grounds that the level of housing provision is considered inadequate for the following reasons.

The Hazelbury Bryan Housing Need Review sets out in chapter 3 how it went about establishing the housing need target from the Local Plan housing requirements. We consider that relying on a pro-rata estimate from the Local Plan is fundamentally flawed for several reasons. Using a pro-rata allocation simply considering the head of population fails to consider the settlement hierarchy having regard to services and facility provision. Hazelbury Bryan is well serviced by local facilities and it can therefore be argued that it is capable of taking a higher percentage of the rural numbers than a settlement with less facilities.

The Local Plan figure of 825 dwellings across the rural area is a minimum target and should not be seen as an upper limit. The policy indicates that 'at least 825 dwellings will be provided in the countryside'. Therefore the draft Neighbourhood Plan policy as drafted which states provision is made for 'up to 52 dwellings to be built in Hazelbury Bryan between 2018 and 2031' is negatively worded and seeks to impose a limit on residential development. The policy should therefore at the very least be amended to read 'at least 52 dwellings will be provided for in Hazelbury Bryan between 2018 and 2031'.

The methodology of calculating housing need fails to take into account significant rates of under delivery of housing across North Dorset over the last 10 years. The low delivery rate of 6 completions in Hazelbury Bryan between 2011 and 2018 reinforces this trend experienced across North Dorset. This under delivery is clear evidence that the Council's approach to its spatial distribution of development focussed towards the market towns is not working and is failing to meet the needs of the District. It is therefore extremely likely that the District will need to consider meeting more of its strategic needs in sustainable settlements like Hazelbury Bryan, releasing areas beyond existing settlement boundaries rather than relying upon delivery in the market towns which has thus far failed during the current plan period.

In view of the above we consider that it would be more appropriate for the Neighbourhood Plan to be prepared against delivering a sustainable level of housing growth. Accommodating 15-20% growth above the existing number of dwellings within Hazelbury Bryan would see 73 to 97 new dwellings built. This level of development would assist in meeting local need, provide some essential strategic growth for the District, and support the existing thriving rural community without significantly affecting the character and settlement pattern. Such an approach would enable the Neighbourhood Plan to control where all growth during the next plan period is delivered around the hamlets protecting it from future speculative applications against a lack of housing supply at the District level.



The Neighbourhood Plan finally seeks to rely on existing consents but there is no evidence or consideration that it has determined that there is a realistic prospect of these being delivered. If the Neighbourhood Plan seeks to rely on existing consents it is imperative that it provides evidence to substantiate that the consents stand a realistic prospect of being delivered.

The Local Plan Review and future housing requirement context explained above will see a marked increase in the number of houses required across the District. This will also translate into a higher requirement beyond the four main market towns and could even lead to a change in the spatial distribution of development at a strategic level. In any case, the number of homes required in Hazelbury Bryan is expected to increase and therefore the Neighbourhood Plan should look to increase its housing needs in line with projected increases and allocate more sites to ensure that it can meet these needs.

#### Location of new housing development (allocations)

After establishing the suggested housing needs and accounting for existing consents, Policy HB15 then identifies 4 sites in Hazelbury Bryan to deliver 26 houses as well as a reserve site to deliver an additional 13 houses. We object to Policy HB15 and the allocated sites for the following reasons.

The site selection process for the draft Neighbourhood Plan began with a call for sites followed by the Neighbourhood Plan Committee visiting and assessing the sites against a number of different criteria. The sites were subject to a separate Strategic Environmental Assessment and interim conclusions were made about the sites. After this stage, the public were consulted via questionnaires to gather views on suitability and acceptability of the sites.

The options consultation questionnaire Autumn 2017 simply asked the question on housing and employment sites of whether individuals considered the sites to be suitable and acceptable based upon a score ranking of 1-5. This approach does not seek to gather any understanding of the public opinion on sustainability credentials of each site. It simply establishes whether the public like or dislike a site and the most sustainable option could be disregarded simply because it is unpopular. This process would have been more objective if a range of questions were presented to gauge public opinion on the sustainability credentials of the sites.

#### <u>Site 18</u>

We are disappointed that site 18 land at 'The Ferns' Kingston (as shown outlined in red on the plan at Appendix A) has been excluded from the Neighbourhood Plan allocations and have hence proceeded to submit an outline planning application (2/2017/2016/OUT) for the development of the land with 12 dwellings. The site can provide 12 dwellings which would sit comfortably with the local aspirations of allocating smaller development sites and is capable of providing much needed affordable housing for the parish.

Site 18 was identified as a 'green site' in the site assessment 2017 supporting the Neighbourhood Plan options consultation. The SEA indicated that the impact on biodiversity, fauna and flora was unknown but this is now known to be positive as a result of the biodiversity mitigation plan submitted with the application on the site. It was suggested that the landscape would be adversely affected and it is now known that the landscape would not be significantly affected by development of the site given that it is located in an existing context with built form surrounding it in all directions. The only real adverse impact identified by the Neighbourhood Plan was the safe accessibility of the site. The Dorset County Council Highway Authority have considered this issue in relation to the current application and have raised no objection to the application indicating that at worst the development of this site has a neutral impact.

The options consultation asked for the public opinion regarding the development of site 18 with 10 to 30 houses. Public response was more than likely based upon an assumption the site would be developed at the higher end range of housing and we consider the way the site was presented has influenced the unsuitable score received. Had the public been asked to consider a smaller scheme of 10-15 dwellings on the site and the potential impacts were presented accurately the site may have attracted alternative scoring in its favour.



It appears from the Hazelbury Bryan Neighbourhood Plan Strategic Environmental Assessment – Options Stage Report that the site was not advanced simply based upon public opinion rather than any assessment process regarding matters of sustainability or looking to identify the most appropriate options. For the above reasons we consider that site 18 land north west of Chicken Farm, to Military Road, Kingston should be reconsidered as a more sustainable allocation in the Neighbourhood Plan prior to its formal submission to the Local Planning Authority for examination. We do not consider that the sites selected are the most suitable and appropriate for the following reasons.

#### Sites 7 and 11

The largest preferred housing sites are site 7 and 11 which are covered by site specific allocation policies HB18 and HB17 respectively. These sites are identified to deliver 24 dwellings but are existing employment sites which the adopted North Dorset Local Plan policies seek to retain. The Neighbourhood Plan has not provided any evidence of marketing of these sites, identified that there is no demand for employment uses on these sites or demonstrated that the sites are unviable in the long term. Paragraph 9.8 of the Neighbourhood Plan even acknowledges that "there are no specific linked measures identified to off-set the loss of employment as this is outside the control of the landowner."

The Neighbourhood Plan is required to meet the basic conditions, one of which is being in general conformity with the adopted Local Plan. The Local Plan policies seek to retain existing employment site and the Neighbourhood Plan seeks to remove them for residential development which would appear to render to the plan not in general conformity.

North Dorset District Council's views on this matter are reinforced in the recent refusal of planning application 2/2018/0180/OUT relating to site 11 issued on the 30<sup>th</sup> April 2018. The proposed development was for the development of the land by the erection of 9 no. dwellings in outline and was refused solely on the grounds of "The development of the land with housing would lead to the loss of an employment site within the allocation for Hazelbury Bryan which would be contrary to saved policy 3.2 of the North Dorset District Wide Local Plan (First Revision) and Policy 11 of the North Dorset Local Plan Part 1 (2011-2031)."

Both of these allocations are supported by the suggestion in the Neighbourhood Plan that the sites would reuse brownfield land but this does not recognise that the brownfield benefit is lost by the proposed replacement employment policy HB22 which would allocate a large greenfield site for redevelopment.

Policies HB17 and HB18 are drafted to require up 11 and 13 dwellings and on first consideration it might be assumed that this would deliver the benefit of affordable housing. The truth of the matter is that the policy would not stop an application being submitted for 10 dwellings, this would be policy compliant and would avoid the need to provide affordable housing as it falls below the threshold at which affordable housing contributions are required. In the absence of public benefit, the value of redeveloping a brownfield site lost by a replacement greenfield allocation and the loss of existing employment sites, the merits of these allocations are seriously questionable in the context of sustainable development.

#### <u>Site 2</u>

We object to the inclusion of site 2 (Higher field to the rear of Village Hall, Partway Lane) as a reserve housing allocation in Policy HB20. The justification for this policy appears to be based entirely upon a community benefit of providing off-road parking for the village hall. In fact, it is heavily weighted in favour of this as the Policy text allocates the site for parking in the first instance before it mentions 'up to 13 dwellings'.

The development of this site would result in a negative impact on the rural character as a result of the outward encroachment into the countryside. The proposal would be in contrast to the ribbon pattern of development in the hamlet of Partway. It is also noted that Site 2 did not score highly in the initial site



assessment of 2017 with it viewed as an amber site due to negative impacts relating to built form and character, important green spaces and possible harm to occupants.

The SEA pre-submission stage report identifies that site 2 is likely to have an adverse impact on landscape further reinforcing the initial site assessment from 2017. It is also evident from the options consultation results dates October 2017 that site 2 was clearly not favoured in the absence of community benefit. The allocation of this site which would have a damaging effect on the landscape and character of Partway simply because of the provision of parking spaces for the village hall is short sighted. Alternative parking provision for the village hall could legitimately be secured through S106 contributions from more appropriate development sites in Hazelbury Bryan. The Neighbourhood Plan could even strive to be more forward thinking and look to secure a new village hall facility on the existing recreation ground where parking would not be a problem. We do not consider that option 2 is one of the most appropriate housing sites in the village and therefore object to Policy HB20.

#### **Employment – Economic Development Opportunities**

Chapter 10 of the draft Neighbourhood Plan deals with employment in Hazelbury Bryan and lists the existing employment sites as well as making reference to the adopted North Dorset Local Plan policies which support the retention and small-scale expansion of existing employment sites subject to certain criterion. Policy HB21 is drafted to generally support retention and small-scale expansion of existing employment sites which we support.

We do however raise objection to the text in paragraph 10.4 which states that "Some sites may not be suitable for expansion of the former Chicken Shed at Pleck Farm, Coney Lane, Wonston would not be supported as this would intrude further into an important gap." A complete restriction on any further development on this site is simply not appropriate and pre-judges the merits of any future proposal.

We consider that it is entirely possible that a sensitive scheme could be developed to protect the character and openness of this gap whilst enabling some expansion of the existing employment use of the site as shown outlined in red on the map attached at Appendix B. We therefore object to chapter 10 and Policy HB21 as drafted and request that specific reference to the former Chicken Shed at Pleck Farm, Coney Lane, Wonston is removed so that any future proposals on this site can be judged on their individual merits.

#### **Employment - Allocation**

HB21 also seeks to release existing employment sites identified as site 7 and 11 for residential redevelopment, note our objection to this in the section on housing sites earlier in this response. The draft Neighbourhood Plan seeks to compensate for the loss of this employment via an alternative employment allocation at Site 12 on land adjoining King Stag Mill, The Common through Policy HB22. This site is in excess of 1.5km from the main collection of hamlets in Hazelbury Bryan and would result in the unnecessary release of a greenfield site which negates any benefit that can be derived from brownfield redevelopment on sites 7 and 11.

We object to Policy HB21 and HB22 and the approach to employment for the following reasons. No evidence has been provided that there is no longer a need for the existing employment sites. These sites are currently in a sustainable location within the settlement envelope of Kingston meaning that the sites are accessible to local people. They can therefore support sustainable employment opportunities for the existing population and future growth in Kingston. The proposed new allocation is some distance from the hamlets of Hazelbury Bryan which would mean it is likely that people would need to travel to their jobs via car instead of using sustainable means of travel.

Furthermore, the employment allocation would result in large scale expansion of an existing employment site resulting in significant visual impact on the landscape and alteration to the rural character of the countryside in this location.



NDDC has recently considered the merits of developing Site 12 for employment purposes through its determination of planning application 2/2018/0181/OUT. NDDC concluded that the site would be visually prominent in the landscape, isolated and unsustainable and its redevelopment could not guarantee HGV's would no longer use the highway network through Hazelbury Bryan. As a result of the identifiable harm NDDC refused planning permission.

The Neighbourhood Plan should therefore be amended to remove the proposed residential allocations on Sites 7 and 11 to retain existing sustainable employment sites. New residential sites in appropriate locations such as site 18 can be allocated to meet the housing needs of the neighbourhood plan area. This would also overcome the need to provide a new unsustainable employment allocation at site 12 and therefore Policy HB22 can also be deleted.

Whilst the Neighbourhood Plan can seek to allocate land for employment purposes it cannot guarantee that the site would ever be delivered. A scenario could arise that the existing employment sites are released for residential development and the suggested employment site is never developed thereby resulting in a loss of employment opportunity and jobs in the Parish.

#### Policy HB4. Key Rural Views

The draft Neighbourhood Plan seeks to protect 4 key rural views within the hamlets of Hazelbury Bryan. The Policy indicates that development that would significantly intrude and impact on their enjoyment, by virtue of scale, massing, design or location, will be resisted. View V2 refers to a view along Military Lane in Kingston across open agricultural land towards Bulbarrow Hill. Figure 6 shows the views and their extent and orientation whilst Table 2 provides each view with a location and direction as well as a view description.

Whilst we do not raise objection to the inclusion of V2 from the top of Military Lane we would like to draw attention to the conflict between Figure 6 which shows a clear location and direction of view towards the south east along military lane and table 2 which suggests the view is looking south west along the lane. It is suspected that this is just a typo but we would raise objection to the policy if the key view is suggested to look south west over land adjacent to 'The Ferns' as the view in this orientation is not considered a key rural view. If this is a typo and corrected at submission stage we confirm that we would have no further objection to Policy HB4.

#### Policy HB13. Settlement Boundaries and Important Gaps

Policy HB13 seeks to reintroduce a former 2003 North Dorset Local Plan Policy which sought to prevent coalescence of the individual hamlets of Hazelbury Bryan. We raise objection to the proposed defined gap contained within this policy between Partway and Wonston (and Pleck) as currently annotated in Figure 8.

The hatched area as currently drafted is erroneously drawn over half of an existing building and the parking/turning areas on the site at Pleck Farm, Coney Lane. These areas are all essential to the existing employment use and should not be included in this policy as they are established lawful uses and structures. We believe that some expansion capacity should be considered for the existing employment use at Pleck Farm and therefore request that the defined gap hatching on land at Pleck Farm is redrawn to exclude the entire building, hard surfaced parking and turning area and the small additional parcel of land shown on the map at Appendix B, from the defined gap.

We would finally suggest that it is possible to sensitively design some of the proposed developments and land uses the Policy specifically seeks to resist without undermining the rural and undeveloped nature of the countryside between the hamlets and preventing coalescence. Applications in these areas should be considered on their merits rather than having a restrictive policy as recognised by North Dorset Council when it decided not to save the coalescence policy HB1 from the 2003 district wide Local Plan.



#### Summary

In summary we support the general approach 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 is redrawn to exclude areas of existing development and lawful use.

We raise objection however, to the draft Neighbourhood Plan progressing to submission as drafted and consider its submission should be delayed. 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 and sustainable 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. We would welcome the opportunity to discuss the opportunities that site 18 could offer to the Neighbourhood Plan as it progresses further through the process.

Yours sincerely

Steve Clark Associate \\savukhome03\stephen.clark\$\Personal\Desktop\Neighbourhood Plan Rep - May 2018 - Draft.docx



# Appendix A

## Land at 'The Ferns' Kingston

Source: Dorset Explorer





## Appendix B

### Land at 'Pleck Farm' Coney Lane, Wonston

Source: Dorset Explorer

