



# **Hazelbury Bryan Neighbourhood Plan 2018 to 2031**

**A report to North Dorset District Council**

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Independent Examiner**

**21 November 2018**

## Executive Summary

I was appointed by North Dorset District Council on 31 August 2018, with the agreement of Hazelbury Bryan Parish Council, to carry out the independent examination of the Hazelbury Bryan Neighbourhood Plan.

The examination was completed solely on the basis of the written representations received, no public hearing appearing to me to have been necessary. I made an unaccompanied visit to the area covered by the Plan on 18 October 2018.

Hazelbury Bryan is a rural parish in North Dorset. The Parish Council decided to commission the preparation of a neighbourhood plan in the spring of 2016, and it was formally submitted to North Dorset District Council in July 2018. The Local Plan for the area designates Hazelbury Bryan as a “larger village” which will be expected to deliver sufficient new dwellings to meet identified local and essential rural needs. The plan concludes that between 45 and 52 dwellings need to be provided in the village over the period 2018-2031; taking into account recently-granted planning permissions, this requires new sites to be found to accommodate an additional 14 dwellings, and these are identified through the plan process. Both the “target” figure and the specific allocations are questioned by some of the representations received, and my conclusions on these challenges are dealt with in the body of my report.

While seeking to ensure that an appropriate amount of land to meet both housing and employment needs is identified, the Neighbourhood Plan is clear that its primary objective is that “the attributes of Hazelbury Bryan – its rural nature and its strong sense of community – remain unchanged”<sup>1</sup>.

Subject to a number of recommendations (principally for changes to the detailed wording of some policies), I have concluded that the Hazelbury Bryan Neighbourhood Plan meets all the necessary legal requirements at this stage of its preparation, and consequently am pleased to recommend that it should proceed to referendum.

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<sup>1</sup> See paragraph 3.4 of the Plan

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## Introduction

1. This report sets out the findings of my examination of the Hazelbury Bryan Neighbourhood Plan (the HBNP), submitted to North Dorset District Council (NDDC) by Hazelbury Bryan Parish Council in July 2018. The Neighbourhood Area for these purposes is the same as the Parish boundary.
2. Neighbourhood plans were introduced into the planning process by the Localism Act 2011. They aim to help local communities shape the development and growth of their area, and the intention was given added weight in the National Planning Policy Framework (NPPF), first published in 2012 but revised in July 2018, which continues to be the principal element of national planning policy. Detailed advice is provided by national Planning Practice Guidance (PPG) on neighbourhood planning, first published in March 2014.
3. The main purpose of the independent examination is to assess whether or not the Plan satisfies certain “basic conditions” which must be met before it can proceed to a local referendum, and also whether it is generally legally compliant. In considering the content of the Plan, recommendations may be made concerning changes both to policies and any supporting text.
4. In the present case, my examination concludes with a recommendation that, subject to certain detailed recommendations, the Plan should proceed to referendum. If this results in a positive outcome, the HBNP would ultimately become a part of the statutory development plan, and thus a key consideration in the determination of planning applications relating to land lying within the HBNP area.
5. I am independent of the Parish Council and do not have any interest in any land that may be affected by the Plan. I have the necessary qualifications and experience to carry out the examination, having had 30 years’ experience as a local authority planner (including as Acting Director of Planning and Environmental Health for the City of Manchester), followed by over 20 years’ experience providing training in planning to both elected representatives and officers, for most of that time also working as a Planning Inspector. My appointment has been facilitated by the Independent Examination Service provided by Trevor Roberts Associates.

## Procedural matters

6. I am required to recommend that the Hazelbury Bryan Neighbourhood Plan either
  - be submitted to a local referendum; or
  - that it should proceed to referendum, but as modified in the light of my recommendations; or
  - that it not be permitted to proceed to referendum, on the grounds that it does not meet the requirements referred to in paragraph 3 above.
7. In carrying out my assessment, I have had regard to the following principal documents (references are to the Neighbourhood Planning (General) Regulations 2012 (as amended)):
  - the submitted HBNP
  - the pre-submission version of the Plan
  - the HBNP Consultation Statement, (Regulation 15)
  - the HBNP Basic Conditions Statement (Regulation 15)
  - the HBNP Strategic Environmental Assessment Screening Report
  - the SEA Report itself

- the representations made to the HBNP under Regulation 16 (and, where appropriate, under Regulation 14)
  - selected policies of the adopted Local Plan for North Dorset
  - relevant paragraphs of the National Planning Policy Framework (March 2012)
  - relevant paragraphs of the national Planning Policy Guidance (March 2014 and updates).
8. I carried out an unaccompanied visit to the Plan area on 18 October 2018, when I looked at the overall character and appearance of the Parish, together with its setting in the wider landscape, those areas affected by specific policies in the Plan, and the locations referred to by objectors. I refer to my visit in more detail elsewhere in this report.
9. It is expected that the examination of a draft neighbourhood plan will not include a public hearing, and that the examiner should reach a view by considering written representations<sup>2</sup>. In the present case, I considered hearing sessions to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against its suitability to proceed to a referendum. I should add that none of the representations received at the Regulation 16 included a request for a hearing, although a later suggestion was made by Chapman Lily Planning that such a course of action might have some merit.

### A brief picture of the Neighbourhood Plan area

10. Hazelbury Bryan is a large rural parish situated in the southern part of the Blackmore Vale. It is a somewhat unusual settlement (in my experience, at least) in that it does not readily conform to the typical image of a nucleated village with a clearly identified historic core, and a scattering of smaller groupings round about. Instead, to quote paragraph 2.2 of the Plan, “the village comprises seven separate hamlets of Kingston, Wonston (and Pleck), Pidney, Partway, Woodrow, Droop and Park Gate”. Most (but not all) of these built elements occupy the higher ground in the parish, which means that good views are to be had across the open agricultural land which separates them. A seemingly random pattern of narrow lanes connects the various component parts of the parish.
11. There is little uniformity in the built environment, with each small settlement having its own form and character – a distinctiveness which the Plan recognises and seeks to preserve. There are one or two examples of earlier “suburban” infill development which have been less successful than more modern schemes in respecting the rural character of the village. As far as services are concerned, there is a primary school (which is close to the parish church in the small hamlet of Droop, somewhat detached from the rest of the village); a shop / post office; a Methodist church; the village hall; and a public house. There are also several local businesses (including a café) within the parish.
12. The present population of Hazelbury Bryan (2011 Census) is given as 1059, living in 480 homes. Table 5 of the Plan notes that a further eight dwellings have been built since then, and 30 more have received planning permission; however, the introduction to paragraph 9.1 states that six houses have been built since the census, not eight). ***I recommend that this small discrepancy be corrected.*** The adopted North Dorset Local Plan designates it as one of 18 “larger villages” which are expected to make a contribution towards meeting identified local and essential rural needs: the HBNP concludes that between 45 and 52 dwellings need to be provided in the village over the period 2018-2031; taking into account recently-granted planning permissions and dwellings

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<sup>2</sup> Paragraph 9(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended).

completed since the start of the plan period, it concludes that new sites need to be found to accommodate an additional 14 dwellings, a particular issue arising from the consultation exercises being the need to provide more lower cost and smaller houses for local residents (including an element of starter-homes).

### **The basic conditions**

13. I am not required to come to a view about the ‘soundness’ of the plan (in the way which applies to the examination of local plans); instead I must principally address whether or not it is appropriate to make it, having regard to certain “basic conditions”, as listed at paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended). The requirements are also set out in paragraph 065<sup>3</sup> of the Planning Practice Guidance. I deal with each of these conditions below in the context of the HBNP’s policies but, in brief, all neighbourhood plans must:

- have regard to national policy and guidance (Condition a);
- contribute to the achievement of sustainable development (Condition d);
- be in general conformity with the strategic policies in the development plan for the local area (Condition e);
- not breach, and otherwise be compatible with, EU obligations, including human rights requirements (Condition f);
- not be likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010) or a European offshore marine site, either alone or in combination with other plans or projects; and
- comply with any other prescribed matters.

14. The Basic Conditions Statement (BCS), prepared by Dorset Planning Consultant Ltd on behalf of the Parish Council, is dated June 2018. It begins by summarising the statutory requirements before taking each section and policy of the HBNP and assessing its relationship with the national and local planning context, adding appropriate comments on general conformity. I will refer to specific elements of this document as necessary when considering the detailed provisions of the Plan.

### **Other statutory requirements**

15. A number of other statutory requirements apply to the preparation of neighbourhood plans, all of which I consider have been met in this case. These are:

- that the Parish Council is the appropriate qualifying body (Localism Act 2011) able to lead preparation of a neighbourhood plan;
- that what has been prepared is a Neighbourhood Development Plan, as formally defined by the Localism Act; that the plan area does not relate to more than one Neighbourhood Area; and that there are no other neighbourhood plans in place within the area covered by the plan;
- that the plan period must be stated (which in the case of Hazelbury Bryan is 2018 to 2031); and
- that no “excluded development” is involved (this primarily relates to development involving minerals and waste and nationally-significant infrastructure projects).

16. I have also borne in mind the particular duty under section 72 of the Planning (Listed Buildings

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<sup>3</sup> Reference ID: 41-065-20140306

and Conservation Areas) Act 1990 to pay special attention to the desirability of “preserving or enhancing the character or appearance” of any conservation area.

17. A screening report is required in order to determine whether a neighbourhood plan needs to be accompanied by a Strategic Environmental Assessment (SEA), under the terms of the Environmental Assessment of Plans and Programmes Regulations 2004. It is the qualifying body’s responsibility to undertake any necessary environmental assessments, but it is the Local Planning Authority’s responsibility to engage with the statutory consultees.
18. A Strategic Environmental Assessment Screening and Scoping Report for the HBNP was submitted to NDDC in July 2017 and subsequently made available to the statutory consultation bodies. As a result of the responses received from Natural England and Historic England to the screening and scoping consultation, together with related comments from the Environment Agency and Historic England at the options consultation stage, NDDC concluded that an SEA was required for the following reasons:
  - the Plan was likely to allocate 16-20 dwellings; and
  - the Plan area includes a large number of heritage assets.
19. The results of the subsequent SEA, carried out by Dorset Planning Consultant Ltd on behalf of the Parish Council, are contained in a report dated March 2018 (with an addendum added in June 2018). This details the likely impact on the environment of the objectives and individual policies of the Plan, together with appropriate mitigation and monitoring measures, all within the context of relevant national and local planning policies and related statutory provisions. Sustainability objectives were identified and used in an assessment of the options for site allocations: unsurprisingly, this suggested that some “scored” better than others in a number of respects, but overall the report concludes that the HBNP would have “positive environmental sustainability impacts”.
20. It is a requirement under the Planning Acts that policies in neighbourhood plans must relate to “the development and use of land”, whether within the Plan area as a whole or in some specified part(s) of it. I am satisfied that that requirement is met.

### **National policy**

21. National policy is set out primarily in the National Planning Policy Framework (NPPF), a key theme being the need to achieve sustainable development. The NPPF is supported by Planning Practice Guidance (PPG), an online resource which is continually updated by Government. I have borne particularly in mind the advice in the PPG that a policy in a neighbourhood plan should be clear and unambiguous, concise, precise and supported by appropriate evidence<sup>4</sup>.

### **The existing Development Plan for the area**

22. The current development plan for the area includes the North Dorset Local Plan Part 1 (adopted January 2016), together with a number of policies “saved” from the North Dorset District-Wide Local Plan 2003. For convenience, throughout my report I will refer to these simply as parts of

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<sup>4</sup> The Hazelbury Bryan Neighbourhood Plan was prepared and submitted before the introduction of the current version of the National Planning Policy Framework, which was published on 24 July 2018. However, paragraph 214 of the new NPPF makes it clear that the policies in the previous Framework apply for the purpose of examining plans submitted on or before 24 January 2019. All references in this report to NPPF paragraph numbers therefore relate to the *original* (2012) version.

the (adopted) Local Plan.

23. The Council have embarked upon a review of the Local Plan, and have published an “Issues and Options” document on which consultation ended in January 2018. Basic Condition (e) requires neighbourhood plans to be “in general conformity with the strategic policies of the development plan for the area”: this clearly means the *adopted* development plan. However, I bear in mind the advice at paragraph 009<sup>5</sup> of the PPG, which says: “Although a draft neighbourhood plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested.”

#### **The consultation exercise (Regulation 14)**

24. This regulation requires the Parish Council to publicise details of their proposals “in a way that is likely to bring [them] to the attention of people who live, work or carry on business in the area”, and to provide details of how representations about them could be made. Regulation 15 requires the submission to the Local Planning Authority of a statement setting out the details of what was done in this respect, and how the qualifying body responded to any matters which arose as a result of the consultation process.
25. The Consultation Statement (described as a summary of the process, but containing a great deal of detail) is dated June 2018. It sets out the stages which the Plan’s Working Group followed, from raising local awareness in December 2015 (which acknowledged that there might have been limited enthusiasm for the project, given the fact that a Parish Plan had been produced in 2010, with a necessarily different agenda); a public meeting in April 2016 to decide whether or not to proceed with a neighbourhood plan; and a comprehensive consultation exercise carried out in October 2016, centering on broad questions about what the Plan’s key objectives should be. This was followed by a more detailed questionnaire at the end of 2016, and a “call for sites” in April 2017 which led subsequently to a public consultation on the options which emerged as a result. At this stage, about 270 people took part in the consultation, and 240 questionnaires were returned. The pre-submission consultation (including the involvement of statutory consultees) took place in April / May 2018. I have also noted that, throughout this process, a newsletter (which ran to eight editions) was hand-delivered to every household in the parish, in addition to regular updates on the Parish Council’s website.
26. I am more than satisfied, having read the Consultation Statement, that the requirements of Regulation 14 have been fully met by the Working Group’s activities.

#### **General observations about the Plan**

27. The following comments may be helpful in understanding the way I have approached my report on the Plan and the observations and recommendations which I make upon it:
  - the Plan Working Group have spent considerable time and energy, in full consultation with the local community at large, in identifying the issues and objectives that they wish to include in the Plan, and this entirely reflects the aims of the “localism” agenda;
  - the recommendations I make concentrate on the policies themselves, since that is what the basic conditions relate to;

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<sup>5</sup> Paragraph: 009 Reference ID: 41-009-20160211

- the Plan properly focuses on land use policies, reflecting Planning Practice Guidance;
  - I have addressed the policies broadly in the order that they appear in the submitted plan (the exception being that which is concerned with the scale and general location of the proposed new housing, which I have taken first). I have set out my views about each of the policies, irrespective of whether or not any modification is thought necessary;
  - my recommendations for changes to the policies and any associated or free-standing changes to the text of the Plan are highlighted in ***bold italic print***.
28. The Plan document begins with a summary of what local residents value most about living in Hazelbury Bryan (and what they think the key problems are). Crucially, it contains a recognition that a neighbourhood plan cannot provide all the answers – but that it can provide an opportunity to influence the changes that will inevitably affect the village in the future.
29. After summarising the relevance of the North Dorset Local Plan to the neighbourhood planning process, followed by a brief account of the way the HBNP was prepared, paragraph 2.20 makes the important point that the Plan “may be reviewed before its formal expiry date of 2031, to take account of changes in national or local policy, changing needs within the Parish, to reduce any adverse impacts identified through monitoring, or simply to roll it forward to cover the period beyond 2031.”
30. Paragraph 3.4 of the Plan records the vision for the village to be *“that the attributes of Hazelbury Bryan – its rural character and its strong sense of community – remain largely unchanged”*. This is then supported by two objectives:
- *“To protect, as far as possible, the current environment in all its aspects (individual hamlets, plenty of green spaces, diversity of design, etc.)..... and*
  - *To allow the village to grow at a rate that is sustainable and keeping pace with improvements to the infrastructure (roads, public transport etc) which cannot be directly influenced by the plan.”*
31. These objectives are then given detailed effect by the individual policies, each of which is clearly separated from their introductory and explanatory text by being printed in a different colour. There are three appendices, including one listing (with relevant web-links) the documents which formed the evidence base for the Plan and one which helpfully sets out the kind of information which design and access statements should include with any planning applications.
32. Overall, the Plan document is attractively set out, with generous use of plans and photographs, making it very user-friendly and easy to navigate. One or two of the plans could be made somewhat clearer – especially the way the numbering is handled in Figures 7 and 11 and the policies map (un-numbered) and ***I recommend that this be considered for the final version of the Plan.***

## Representations received (Regulation 16)

33. 16 representations were made in response to the submitted Plan<sup>6</sup>. Six of these were from public bodies, none of which involved objections. Five representations were from members of the public objecting to the failure of the Plan to allocate a site (referred to as Site 2) for development – this is also dealt with in more detail by consultants; and three further objections were received in connection with land allocation issues. I will deal with each of these in due course.
34. I note here that on 1 October, NDDC contacted respondents by email to say that the Strategic Environmental Assessment Pre-Submission Report plus Submission Addendum may not have been accessible on the Council's website for some part of the six-week Regulation 16 period. For this reason, they decided to extend the statutory period for a further two weeks, ending on 15 October 2018.
35. I have seen a response to this from Chapman Lily Planning Ltd which (to summarise it) suggests that a failure to advertise for a *consecutive* period of six weeks might result in non-compliance with the statutory regulations and that a further six-week consultation should therefore be undertaken. The company do not suggest that they or their clients have been put to any specific disadvantage by the (possible) non-appearance of the SEA on the Council's website for an (unspecified) period, although they have objected to the final results of the assessment itself, which I will come to in due course. For their part, NDDC have explained that no party contacted them during the consultation period to alert them to any problem with the online process. They do not consider that it is necessary for the consultation period to be extended.
36. In a formal sense, I am clear from the statutory arrangements that the ultimate decision on this procedural matter must lie with the District Council. Nevertheless, it seems to me that, in the absence of any evidence suggesting that a party has been put to any disadvantage by a technical problem of the kind described (indeed, in the absence of any evidence that such a problem actually existed), the broader public interest would not be served by introducing delay and uncertainty at this late stage in the preparation of the Plan.

## The Neighbourhood Plan's approach to determining housing need

37. Policy 2 of Part 1 of the adopted North Dorset Local Plan is the core spatial strategy for the District. In summary, it identifies the area's four main towns as the principal focus of future growth, with Stalbridge and 18 "larger villages" (of which Hazelbury Bryan is one) meeting local needs. Outside these identified settlements, the remainder of the District will be subject to countryside policies where development will be strictly controlled, unless it is required to enable essential rural needs to be met.
38. Local Plan Policy 6 describes the overall housing requirements for North Dorset during the Plan period (2011-2031), reiterating that the vast majority of the growth will be in the four main towns and allocating broad minimum housing numbers to each. Elsewhere, *"the level of housing and affordable housing provision will be the cumulative number of new homes delivered to contribute towards meeting identified local and essential rural needs. At least 825 dwellings will be provided in the countryside (including Stalbridge and the villages) during the period 2011 – 2031"*. Settlements such as Hazelbury Bryan therefore do not have specific "targets" for identifying land (either for housing or employment uses).

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<sup>6</sup> I include here those made after the closing date by Mr N Smith, which I have agreed to consider following consultation with NDDC

39. The HBNP is clearly an appropriate vehicle for taking the issue further. Table 5 sets out the conclusions reached by a housing needs review dated November 2017 (with an update in June 2018). The exercise was carried out by the Hazelbury Bryan Neighbourhood Plan Group, in conjunction with Dorset Planning Consultant Ltd, and in consultation with NDDC. The process took the adopted Local Plan as the starting point, but reference is also made to the Bournemouth/Poole Housing Market Area Strategic Housing Market Assessment, 2012, which informed the objectively assessed needs of the adopted local plan; the Eastern Dorset SHMA (2015) and the DCLG household projections (2017), which are likely to inform the same in respect of the emerging local plan; past rates of development in the area; 2011 Census data; data from the North Dorset District Council Housing Register; and local survey work.
40. The 2011 Census records 1059 people (454 households) living in Hazelbury Bryan, occupying 480 dwellings. The Plan notes that, since then, a further eight dwellings have been built and an additional 30 have received planning permission. Table 5 summarises the position by noting that a pro-rata target from the Local Plan, the two SHMAs and demographic projections<sup>7</sup> results in a need for 44 to 56 dwellings between 2011 and 2031; past build rates suggest 40-60; and the local data (including the Housing Register) 30 dwellings on larger sites of 10+ homes, and provision for smaller self-build plots. Noting also that the consultation process suggested local support for new houses in the range 11-50, the Plan is based on 45-52 dwellings in total, which is at the upper end of the average of the indicators used. When the 38 dwellings already built or approved during the Plan period are subtracted, the result is 14 dwellings on sites to be identified.
41. The approach summarised above is considered flawed by some respondents to the Plan. Chapman Lily Planning, acting on behalf of local landowners, while supporting the Plan's overall vision, consider that the 2011 Census is not an appropriate starting-point for a calculation of housing need; that caution should be used in averaging-out local opinion following consultation; relying on past build-out rates also raises difficulties; taking data from the housing register can only give a picture of existing, not future, needs; and, as far as the affordable element is concerned, it would not be appropriate for the Plan to differentiate between the needs of people with a local connection and others, especially since the 2015 Eastern Dorset Strategic Housing Market Assessment found an increasing demand for affordable housing in the wider area. This analysis leads the agents to argue that the HBNP should be increasing the amount of land allocated for housing, in the absence of which it fails to satisfy basic conditions a), e) and g).
42. I have noted the advice at paragraph 040 of the PPG<sup>8</sup>, to the effect that: *"there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan ..."*; and also that, where neighbourhood plans contain policies relevant to housing supply, *"these policies should take account of latest and up-to-date evidence of housing need..."*. I consider that, so far as the HBNP's approach to the identification of housing need is concerned, these requirements are met. I see no clear support for Chapman Lily's contention that the Plan constrains the delivery of important national policy objectives (PPG para 69), that it fails to be in general conformity with the strategic policies of the development plan (basic condition e), or that it fails to address the general matters of compliance as set out in basic condition g).

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<sup>7</sup> using the Draft Indicative Assessment of Housing Need Based on Proposed Formula, 2016 to 2026, 2017 (Department for Communities and Local Government)

<sup>8</sup> Reference ID: 41-040-20160211

43. As for the comment that it is inappropriate for the Plan to differentiate between those with and those without a local connection to the parish, I have taken this to be part of the broader critique of the methodology outlined above; it is common practice for neighbourhood plans to prioritise affordable housing negotiated through the planning system. HBNP policy HB16 contains such a provision, as does paragraph 9.6 (which explicitly describes a “cascading” approach).
44. I am satisfied that the Parish Council understand the need for monitoring of the HBNP in due course (see paragraphs 2.19 and 2.20), something that may well be brought into sharper focus as progress is made on the review of the North Dorset Local Plan. Meanwhile, it also remains the case that any planning application for development of land not allocated in the HBNP would need to be assessed on its merits, and in the light not just of the development plan, but all other material planning considerations – such as the latest information about the supply of, and need for, housing land.
45. Chapman Lily also point out that policy HB15 proposes a cap on housing delivery: I take this to refer to the phrase “Provision is made for up to 52 dwellings...” [my emphasis]. I agree with them that it would be preferable to describe this in more positive terms, for the reasons they give (while also noting that the actual figure is capable of being enhanced by infill schemes that would normally comply with established policy for villages such as this). NDDC make a separate point – if the 30 dwellings with planning permission are added to the 26 provided for in the allocations, the total (ignoring infill) would be 56, not 52). ***I therefore recommend that the words “up to” be removed from the policy wording, and that the figure “56” is substituted for “52”.***
46. Similar concerns about the context for the housing land calculations and allocations are raised by Savills, also acting on behalf of local landowners. More specifically, they say that the intended plan period (2018-2031) should be extended; that preparation of the HBNP is in any event premature, given the fact that the Local Plan is in the process of being reviewed; that there is reason to believe that the housing requirements for North Dorset will increase (including as a result of the recent standardisation of the methodology); and that NDDC are not able to demonstrate a five-year land supply.
47. I have already noted the advice about the evidence base at paragraph 040 of the PPG. It is clear to me that this cannot be interpreted in such a way as to result in neighbourhood plans effectively being in a permanent state of uncertainty. In my opinion, the HBNP has been prepared on the basis of a reasonable understanding of the evidence about housing need as it existed at the time, and that is as much as could be asked of it.
48. Savills also reject a pro-rata “sharing out” of the North Dorset Local Plan requirements among the villages, since this fails to take account of what they see as the particular ability of Hazelbury Bryan to accommodate housing growth. In addition, they take the view that the Local Plan’s strategy of concentrating most development in the larger towns “is not working”, and add a generalised opinion which expresses doubt as to whether the existing planning permissions in the village will be implemented. This thinking leads them to put the appropriate housing requirement for the Neighbourhood Plan as 73 to 97 new dwellings.
49. None of these arguments has any bearing on my assessment of the HBNP in terms of its compliance with the basic conditions, the appropriate forum for them clearly being in the context of the Local Plan examination. Savills also have specific objections to the HBNP’s site allocations, and I will deal with these under policy HB15.

50. Finally under this heading, CPA chartered surveyors, acting for the owner of land known as Site 20 in the plan process, support the general objections covered in the previous paragraphs, adding a further one in relation to the loss of employment land (see my comments on policies HB15/17/18 below).

## The policies

### Policy HB1: Reinforcing local landscape character

51. This policy simply sets down the five key characteristics of Hazelbury Bryan which the Plan seeks to ensure are respected and enhanced by new development. These include the area's general tranquility, the dark skies, and a range of local landscape features. Opportunities are to be taken to reinstate historic field boundaries and the like, where feasible.
52. The policy clearly reflects national and local objectives, including NPPF at paragraph 109 and Local Plan policies 4 and 5. While it satisfies the basic conditions, to avoid being too prescriptive in relation to enhancements, ***I recommend that the preamble to the policy read: "Development should respect and, wherever practicable, enhance local landscape character...."***

### Policy HB2: Protecting local wildlife

53. As with the previous policy, HB2 properly reflects national and local policies to protect and enhance biodiversity. It specifies five situations where a development proposal should be accompanied by a biodiversity mitigation and enhancement plan, including works close to the existing or potential "ecological network" shown on Figure 5. Since the scope of policy HB2 includes measures relating both to fauna and flora, its title should be expressed more generally to reflect this; in addition, and again as with policy HB1, there should be some separation of the concepts of protection and enhancement. ***I therefore recommend that policy HB2 be re-titled "Protecting and enhancing local biodiversity", and that the opening words of the policy itself should read "Development should protect and, wherever practicable, enhance biodiversity through an understanding....."***

### Policy HB3: Local Green Spaces

54. This policy relates to eight parcels of land which the Plan seeks to designate as Local Green Spaces. NPPF paragraph 76 states that: *"Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space, local communities will be able to rule out new development other than in very special circumstances"*. Paragraph 77 of the NPPF goes on to say that the Local Green Space (LGS) designation will not be appropriate for most green areas or open space, and should only be used where three criteria are met, namely:
- *where the green space is in reasonably close proximity to the community it serves;*
  - *where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquility or richness of its wildlife; and*
  - *where the green area concerned is local in character and is not an extensive tract of land.*

55. Table 1 of the Plan gives an explanation as to why each of the eight sites is considered important in these terms. I inspected all of them on my visit to the area (although some were difficult to see in their entirety from within the public realm), and it seemed to me that, while one or two are very small and unlikely in practical terms to be subject to development pressures, all satisfied the broad criteria set out in the NPPF. I also note that the last paragraph of Local Plan policy 15 encourages neighbourhood plans to examine the scope for designating local green spaces. There have been no objections to any of the sites being so identified in the HBNP.

#### **Policy HB4: Key rural views**

56. Policy HB4 simply states an intention to resist development which would harm appreciation of four key views identified and described in Table 2 and shown in diagrammatic form on Figure 7. Such an objective reflects the overall character of the village and clearly meets national and local planning policy objectives.

#### **Policies HB5 to HB12: Locally distinctive development**

57. I have taken these policies together, since they all relate to a key intention of the Plan, which is to recognise and maintain the individuality of the seven constituent parts of Hazelbury Bryan. Policy HB5 is an over-arching statement designed to bring this about, focusing on five aspects of the physical environment to which particular attention must be given when development is brought forward. These are developed in considerably more detail in Table 3 (“General Design Principles”); in addition, policies HB6 to HB12 are, as the Plan explains, bespoke to each of the seven hamlets. The material preceding the policies themselves includes descriptions of the various settlements (together with photographs) which highlight their various attributes, all set in a historical context.
58. Historic England suggest that consideration be given to raising the status of Table 3 to that of a policy, but I have concluded that the explicit link which is made within policy HB5 to its relevance is adequate to deal with the point.
59. I am satisfied that these policies all meet the basic conditions. More generally, I consider that they are generally written in a way which avoids over-prescription.

#### **Policy HB13: Settlement boundaries and important gaps**

60. Paragraphs 7.48 – 7.49 of the Plan explains that the 2003 Local Plan for North Dorset drew settlement boundaries around Kingston, Wonston/Pleck and Pidney/Partway, but not around the other three hamlets. This arrangement did not change in the 2016 version but the Neighbourhood Plan has taken the opportunity to make some adjustments, principally by separating out Pidney and Partway, each of which would now have their own defined boundary in order to preserve the gap which exists between them. These are clearly judgements which it is within the scope of neighbourhood plans to make, and there are no difficulties with the basic conditions.
61. However, there is a particular significance in the process of defining settlement boundaries which the Plan does not adequately highlight. While paragraph 7.47 notes that they “are a well-

known planning tool that helps to define those built-up areas where further infill development will in principle be acceptable” (something which is reiterated in the Basic Conditions Statement and is in any event in line with Local Plan policy), there is no reference to this in policy HB13 itself. ***I therefore recommend that, as well as dealing with the development management approach to proposals within the defined gaps between the settlements, the policy states that infill development will be acceptable in principle within the four hamlets of Kingston, Wonston/Pleck, Pidney and Partway, subject to the criteria referred to in paragraph 7.47 (expanded as considered appropriate). For the avoidance of any doubt, the opportunity should also be taken to explain clearly what the attitude to infill would be within Woodrow, Droop and Park Gate.***

62. A specific representation was made by Savills on behalf of clients with an interest in land at Pleck Farm, Coney Lane. Coney Lane is a marked footpath running eastwards from a point on Partway Lane at the northern edge of the Wonston/Pleck built-up area. There is a large single-storey structure alongside and to the north of the footpath, together with an area of hard-standing, which at the time of my visit appeared to be at least partially vacant. There was a sign saying that it was available to let. To the north of the site, the land is open, and forms part of the protected gap being proposed to separate Wonston/Pleck from Partway.
63. At the Regulation 14 stage, Savills objected to the inclusion of reference to their clients’ site found in the text (paragraph 10.4 of the submitted version of the Plan) supporting policy HB20 (Employment development opportunities): “...some sites may not be suitable for expansion, depending on their location and surrounding constraints. For example, the expansion of the former chicken shed at Pleck Farm, Coney Lane, Wonston would be likely to intrude further into an important open gap, and its expansion beyond the current area of hard-standing is unlikely to be supported due to this constraint.” The objectors saw this as an unreasonable restriction which pre-judged the merits of any development proposal which might come forward.
64. The agents’ response to the submitted Plan records the fact that some modification to the policy boundary had been made “to exclude all existing buildings and hard-standing at Pleck Farm, Coney Lane”<sup>9</sup>, but argue that more land should be excluded to enable some small-scale expansion of the existing employment use, which they say can be achieved without compromising the value of the gap between the hamlets. In addition, they note that their objection to the specific reference to the former chicken-shed has not been met.
65. As to the first of these points, I see nothing in the way that the basic conditions are framed which, of themselves, supports the objectors’ case. My understanding is that the settlement boundary in this part of the village would remain largely unchanged from the time of the 2003 Local Plan, and consequently that there is a long-standing policy to treat the open land between Wonston/Pleck and Partway as being in the open countryside for planning purposes, and therefore subject to development restraint. In any event, policy HB13 does not represent a complete ban on new development: there remains some flexibility to enable a proposal of the type suggested to be considered on its merits.
66. I do, however, have some sympathy with the objectors’ concerns about the specific reference to the farm at paragraph 10.4. I can see no clear reason for identifying this particular land (even as an “example”) when the general approach to development affecting the important local gaps is made sufficiently clear in policy HB13.

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<sup>9</sup> I have had difficulty in establishing what these modifications were, since the boundaries of the defined gap shown on the March 2018 (Pre-submission) version of the Plan (Figure 8) and those shown in the Submission version (re-numbered as Figure 9) seem to me to be identical.

67. ***I therefore recommend that no change be made to the boundaries of the defined gap between Wonston/Pleck and Partway, but that the second sentence of paragraph 10.4 be deleted.***
68. NDDC point out that there is a discrepancy between paragraph 7.51 of the Plan (which says that the settlement boundaries have not been re-drawn in order to reflect the green field site-specific allocations) and Figure 11 (which appears to show the opposite). NDDC suggest the deletion of paragraph 7.51; in my view, there is a rather stronger argument for retaining it and re-drawing the boundaries in Figure 11 instead. ***I am content to leave the decision on this choice to the working group, but recommend that the anomaly be removed.***

#### **Policy HB14: Supporting community facilities**

69. The preamble to this policy summarises the range of community facilities serving Hazelbury Bryan (including some, such as health care and secondary education which, unsurprisingly, are located some distance away in larger settlements such as Sturminster Newton). Policy HB14 sets out to protect and, where appropriate, enhance social, educational, recreational and other community assets within the village. Developer contributions may be sought in order to achieve this. Figure 10 locates the existing facilities<sup>10</sup>; it also shows existing and proposed key footpaths, with paragraph 8.21 noting the importance of these as a way of avoiding the often narrow and winding roads which characterise all the hamlets and the links between them. Policy HB14 clearly satisfies the basic conditions by reflecting (for example) NPPF section 8 and a range of policies in the Local Plan.
70. In my discussion of policy HB15 below, I refer to an objection by Chapman Lily. This includes a consideration of the Plan's stated community needs, with specific reference to footpath links and parking for the village hall.

#### **Policy HB15: Meeting housing needs – amount and location of new dwellings**

71. The introduction to this policy records those sites where unimplemented planning permission exists for new housing (30 dwellings in total) and, in Table 5, sets out the range of figures which indicate the overall housing need for the village over the Plan period. As summarised in the section of my report describing the Plan's overall approach to determining the local need for housing, the conclusion of this exercise is that it should accommodate between 45 and 52 dwellings, with the upper end of this range being described as "a reasonable target". When the houses already built (8) and recent planning permissions (yielding 30) are taken into account, new sites for a further 14 dwellings needed to be found. Policy HB15 identifies land which is expected to yield a total of 26 new units, which is more than the calculated need.
72. The Strategic Environmental Assessment (see above) incorporated the results of the subsequent "call for sites". This is a comprehensive analysis of the broader likely effects of the HBNP on the environment, both positive and negative, including consideration of a range of sustainability objectives. The SEA then considered each of the potential development sites (26 in all) against a total of eight objectives, and carried out a similar exercise in relation to the Plan's policies. The result of this work is the allocations for housing and employment shown on Figure 11 and (so far as the housing elements are concerned) in policy HB15.

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<sup>10</sup> Open areas such as allotments and recreation areas are all shown as Local Green Spaces (Figure 7)

73. There have been a number objections to this aspect of the Plan, principally involving concerns about the site selection process. I will deal with each of these in turn, but first there is a need to set down my understanding of the status of land at the higher field to the rear of the Village Hall on Partway Lane, identified in the site assessment process as "Site 2". My understanding of the history of the consideration of this land as a possible housing site is as follows:
- at the pre-submission stage (March 2018), it was referred to in policy HB15 "as a reserve site for up to 13 dwellings" whose release "...should be phased through the review of the Neighbourhood Plan, or alternatively it may be permitted after 2026 if there is clear evidence that the minimum target of 45 homes will not be achieved without its release". Figure 10 identified the location (although without describing it as a "reserve" allocation). The draft plan referred to the site again in policy HB20, where detailed criteria for its development were set out;
  - the SEA report (also March 2018) included an assessment of the site along with the others at that stage being considered. A detailed commentary on its characteristics is set out at paragraph 9.25;
  - an addendum to the SEA, dealing with the main issues raised through the subsequent consultation on it, summarised and briefly commented on Chapman Lily's objections to the designation of Site 2 as a reserve allocation, rather than a firm one (see details below);
  - the Basic Conditions Statement dated June 2018, in dealing with the issue of general conformity with the strategic policies of the development plan, comments in parentheses (page 8), that "the reserve allocation has been deleted from the plan as a result of recent permissions". I take this to be a reference to Site 2;
  - the Consultation Statement also records this action, at pages 5, 65 and 66, citing what was now seen as the lack of need for the site;
  - there is therefore no mention of Site 2 in the submission version of the Plan.
74. Based on the above summary, my examination of the Plan has proceeded on the basis that Site 2 is no longer being considered as a housing opportunity, either as a reserve site or otherwise.
75. Chapman Lily Planning Ltd, on behalf of the owners the Partway Lane land, consider that the HBNP as a whole does not achieve sustainable development and is not deliverable. They base this largely on the failure to allocate Site 2, which is now the subject of an outline planning application (undetermined at the time of writing) for the construction of up to 13 new homes. The agents also suggest that there are serious concerns about the deliverability of the surviving allocations and, more generally, that there are "discrepancies" in the SEA which informed the final version of the Plan. Five individual responses support the reinstatement of Site 2 as a firm allocation, although there was also some objection to its even being considered as a reserve site.
76. Chapman Lily's representation on the submission version of the Plan (dated 18 September 2018) states that their clients were disappointed to find that Site 2 had been relegated from being shortlisted for housing to the status of a "reserve" site, a matter which they had raised with the Parish Council at the Regulation 14 stage. They state that their position has not changed (the representation does not explicitly refer to the fact that the Plan now makes no provision at all in relation to Site 2, but I have nevertheless taken it to be logical that objection is raised on those

grounds).

77. While, given the history, I can understand the disappointment of the site owners about the eventual outcome of the site assessment process, this does not support a conclusion that the basic conditions are not met. It is clear from my reading of the SEA that there were pros and cons with all of the potential sites and, to a large degree, little to choose between them in terms of their overall “scores”. PPG paragraph 042<sup>11</sup> states: “A qualifying body should carry out an appraisal of options and an assessment of individual sites against clearly identified criteria”. These are therefore matters which it is within the discretion of the qualifying body to examine in detail. While there may be scope for disputing the judgements arrived at, it seems to me that the Working Group’s approach overall is rational and clearly explained (see my summary of the approach taken, set out above), and thus that the PPG’s expectations are fully met. It is for the Neighbourhood Plan to determine the “best fit” in dealing with detailed matters of this kind, having regard to the full range of local considerations and its chosen set of criteria.
78. To support further the case for a firm allocation of site 2 for housing, Chapman Lily also note the Plan’s wish to create a new footpath link from the village hall to the existing network to the west of the village (Figure 10 shows this as one of only two such proposals), as well as to provide additional off-road parking for the village hall. These elements are included in the planning application referred to. They say that the footpath link would cross their clients’ land and that they have not agreed to such a scheme, adding that “this aspect of the Plan is not deliverable, so it fails the first basic condition”.
79. This conclusion is based upon two misconceptions. The first is that basic condition a) requires neighbourhood plans to “conform to the NPPF”, whereas the requirement is for them to “(have) regard to national policies...”; and the second is that the reference to paragraph 16 of the NPPF (“Plans should....be prepared positively, in a way that is aspirational but deliverable”) is not in a formal sense relevant, since this wording is taken from the revised version of the document, not the 2012 version which, as explained earlier, is the appropriate one for this examination. I accept that deliverability should be a general consideration in plan-making, but I do not accept that the HBNP fails basic condition a) for the reasons stated: there is nothing in the document to suggest that the footpath link in question is a high-priority project that is central to the achievement of any of the plan’s key objectives, nor is there any evidence to suggest that any other avenues for pursuing the implementation of such a scheme could not be explored.
80. I come to similar conclusions about the second issue. There is no reason to conclude that the Plan “is not able to address” the parking needs of the village hall in the absence of the immediate allocation of site 2 for housing, still less that basic condition d) is not met as a consequence.
81. I also take into account the stated commitment of the Parish Council to review the Plan as necessary in the light of changed circumstances<sup>12</sup> (which, crucially, would include the emerging evidence base in connection with the roll-forward of the Local Plan). In any event, as I pointed out in relation to another representation, any planning application to develop the land would have to be determined on its merits at the point in time when it is made.
82. Mr. N Smith, a local resident, also expresses concerns about the site selection process: he states that it should be based primarily on a robust assessment of their technical strengths and

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<sup>11</sup> Reference ID: 41-042-20170728

<sup>12</sup> Paragraphs 2.19 and 2.20

weaknesses, not simply on the basis of a popular “vote” (which he asserts is what happened here). As I have indicated, it is not within my remit to come to a view on the detailed way in which the consultation process was carried out, nor to question the weight that the Working Group chose to give to particular factors in the final selection process.

83. Savills, on behalf of Messrs Williamson-Jones, put forward a number of reasons why land at “The Ferns”, Kingston (known as Site 18 during the assessment process) should be preferred as an allocated site against Sites 7 and 11: these are identified in policy HB15 as the former Frank Martin’s agricultural depot, intended to yield up to 11 dwellings, and Martin Richard’s Tractor UK land, to produce up to 13 dwellings. Savills raise concerns about the site assessment process, concluding that the way Site 18 was presented to the public might have influenced its eventual rating. They also cast doubt about the deliverability of the hoped-for affordable housing.
84. In addition, the consultants question the allocation of Sites 7 and 11 for housing, since each is currently in employment use, of the type that the Local Plan seeks to retain. They point out that NDDC recently refused outline planning permission for the construction of nine houses on Site 11, on those grounds alone. They conclude that this results in the HBNP failing to satisfy basic condition e), adding that the compensatory provision of the identification of Site 12 for employment use (see policy HB12<sup>13</sup>) is also unsatisfactory since this is greenfield land and thus its development would negate the benefit of the use of brownfield sites for housing.
85. I have noted Savills’ reference to the fact that NDDC recently refused planning permission for the development of Site 12 on a number of grounds, but that of itself does not preclude the Plan from taking a broader view of its potential role in meeting its stated objectives. As far as the specific point about employment land is concerned, it seems to me to be within the proper remit of neighbourhood plans to consider the best way for strategic policies to be applied. In any event, I note that while Local Plan policy 11 does say that “*existing employment sites and sites identified for future employment use will be protected from other forms of development*”, it also provides some element of local discretion: “*Economic development in the countryside (including at Stalbridge and the District’s villages) will be supported by.....enabling rural communities to plan to meet their own local needs, particularly through neighbourhood planning*”. I further note that NDDC have not raised any objections to this aspect of the HBNP.
86. On the specific point about the merits of Site 18, my response is similar to that set out above in respect of Chapman Lily’s objections – principally that I see no reason to conclude that the basic conditions are not met because of the way the site comparisons were carried out.

#### **Policy HB16: Meeting housing needs – dwelling types**

87. Policy HB16 states that priority should be given to lower cost / smaller houses, with particular support for affordable dwellings above the level set by the Local Plan, starter homes, self-build plots, live-work units and accommodation specifically designed for people with limited mobility. Larger houses would generally be acceptable only where the physical context might require such an approach in design terms. More specific guidelines are provided in the following three policies relating to Sites 11, 7 and 13.
88. I am satisfied that the broad intention here relates well to both local and national policies in respect of housing provision in rural areas, and thus that the relevant basic conditions are met.

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<sup>13</sup> referred to as policy HB22 in Savills’ original representation, which is where the proposal was located in the pre-submission version of the Plan

## Policies HB17 – HB19: Sites 11, 7 and 13

89. These three policies set out the more detailed planning requirements in respect of land at Martin Richard's Tractors UK, Kingston (site 11); the former Frank Martin's agricultural depot, Kingston (Site 7); and land adjoining the Retreat, Coney Lane, Pidney (Site 13). All are preceded by tables clearly setting out the characteristics of each site, and their estimated housing capacity. There are no concerns here so far as the basic conditions are concerned.

## Policy HB20: Economic development opportunities

### Policy HB21: Site 12 – Land adjoining King Stag Mill, The Common

90. The preamble to these policies lists existing sources of employment within the parish. Paragraph 10.3 notes that the Local Plan encourages the retention and small-scale extension of employment sites located outside settlement boundaries, so long as certain conditions are met, and HBNP Figure 11 shows the location of these within Hazelbury Bryan (paragraph 10.4 contains a specific reference to the former chicken shed at Pleck Farm about which I commented when dealing with Policy HB13).
91. Policy HB20 gives effect to these objectives. However it also includes support for the redevelopment of sites 11 and 7 (ie for housing): this is potentially confusing and ***I therefore recommend that the second sentence of policy HB20 be deleted.***
92. Policy HB21 addresses the potential loss of existing employment land at these two sites by allocating land adjoining King Stag Mill, at The Common, for Class B uses and similar, subject to a number of detailed requirements. Paragraph 10.5 states that this land is in the same ownership as Site 11; that the owner's intention is to effect the move; and that there are environmental benefits to Kingston in terms of traffic impact. I have already commented on the objection to this proposal (see under Policy HB15).

## Policy HB22: Parking provision

93. This policy seeks to address local concerns about the inadequacy of off-street parking within the parish. It simply states that development should include sufficient parking to meet the anticipated need, and provides some guidance on the design of parking areas. I accept that these requirements present no difficulties from the point of view of the basic conditions, and also that people living in rural areas with poor (or even non-existent) local bus services will be very dependent on the private car. Nevertheless, the policy's requirement that all new dwellings must have a minimum of two on-site parking spaces seems to me to be too prescriptive, and some flexibility is needed. ***I therefore recommend that the phrase in brackets be amended to read: "... (with new dwellings normally being required to provide a minimum of two parking spaces within their grounds...)".***

## Policy HB23: Supporting highway infrastructure improvements

94. Policy HB23 simply states that “developer contributions may be sought where reasonable and necessary for improvements to the road infrastructure as identified through Project HPB1”. The intention to address the problems of highway safety in the village clearly accords with national and local planning policies. The preamble to HB23, and the policy itself, appear to me realistic in the sense that they accept that the opportunities for significant improvements by this means will be few; but as a clear statement of intent, the policy is an appropriate one in its context.

## Project HBP1: Traffic management in Hazelbury Bryan

95. This is correctly described in the Plan as a “project” rather than a policy. It deals with a range of low-cost measures, such as increased signage etc which (strictly speaking) should be better dealt with as an aspiration, since it does not directly involve land-use issues – but this is a minor matter and I see no need to make a specific recommendation to that effect.

### Conclusions on the basic conditions

96. I am satisfied that the Hazelbury Bryan Neighbourhood Plan makes appropriate provision for sustainable development. I conclude that in this and in all other material respects, subject to my recommended modifications, it has appropriate regard to national policy. Similarly, and again subject to my recommended modifications, I conclude that the Plan is in general conformity with the strategic policies in the development plan for the local area. There is no evidence before me to suggest that the Plan is not compatible with EU obligations, including human rights requirements.

### Formal recommendation

97. I have concluded that, provided that the recommendations set out above are followed, the Hazelbury Bryan Neighbourhood Plan would meet the basic conditions, and I therefore recommend that, as modified, it should proceed to a referendum. Finally, I am required to consider whether the referendum area should be extended beyond the Neighbourhood Plan Area, but I have been given no reason to think this is necessary.

*David Kaiserman*

David Kaiserman BA DipTP MRTPI  
Independent Examiner

21 November 2018

## APPENDIX 1 – SUMMARY TABLE OF RECOMMENDATIONS

Examiner's report paragraph	NP reference	Recommendation
12	Paragraph 9.1 / Table 5	<ul style="list-style-type: none"> <li>• resolve discrepancy in number of houses built</li> </ul>
32	general	<ul style="list-style-type: none"> <li>• improve legibility of certain maps</li> </ul>
45	Policy HB15	<ul style="list-style-type: none"> <li>• in first sentence, remove “up to” and change number of dwellings from 52 to 56</li> </ul>
52	Policy HB1	<ul style="list-style-type: none"> <li>• minor re-wording</li> </ul>
53	Policy HB2	<ul style="list-style-type: none"> <li>• re-word title and opening sentence</li> </ul>
61	Policy HB13	<ul style="list-style-type: none"> <li>• include reference to infilling</li> </ul>
67	Para 10.4	<ul style="list-style-type: none"> <li>• remove reference to Pleck Farm (Employment section)</li> </ul>
68	Paragraph 7.51 / Figure 11	<ul style="list-style-type: none"> <li>• remove anomaly over settlement boundaries</li> </ul>
91	Policy HB20	<ul style="list-style-type: none"> <li>• delete second sentence</li> </ul>
93	Policy HB22	<ul style="list-style-type: none"> <li>• minor re-wording</li> </ul>