



Purbeck District Council's Regulation 16 publication of Bere Regis Neighbourhood Plan 2018 Representations form

Bere Regis Neighbourhood Plan have submitted the final draft of their Neighbourhood Plan to Purbeck District Council. The regulation 16 publication period is carried out by the District council and is an opportunity for the council to ask the public and specific consultees for their opinions on how well the Bere Regis Neighbourhood Plan meets the basic conditions.

This is an important stage as it is the last opportunity for you to make comments on the Plan. Following this consultation the plan will be submitted to a planning inspector for examination.

Before responding, we recommend reading the plan paying particular attention to the policies, then reading the evidence base that has informed the plan.

Section 1: Personal details

This section of the form must be completed thoroughly to enable the Council to consider your response.

	Your contact details	Agent's Details (if applicable)
*Name	Mr Eddie Butterfield	Mr Diccon Carpendale
Organisation / Group <small>(if applicable)</small>		Brimble Lea & Partners
*Address line 1		Wessex House
Address line 2		High Street
*Town / City		Gillingham
County		Dorset
*Post Code		SP8 4AG
Telephone number		01747 823232
*1E-mail address		diccon.carpendale@brimblelea.com

* Fields are required *1 Field is preferred

Group Representations

If your representation is on behalf of a group, ensure the lead representative completes the contact details box above. Also, please state here how many people supports the representation.

Section 2: Please note:

- The consultation period starts on **Monday 15 October** and will last for 6 weeks until **Monday 26 November**.
- Responses must be made using this form.
- All respondents must provide their name and address and/or email address.
- All forms must be signed and dated.
- Forms will be available from your Neighbourhood Plan representatives, the District council and you can download the form to print out yourself.
- These representations cannot be treated as confidential. By completing a representation, you agree to your name and comments being made available for public viewing. They will be displayed on the website prior to and during examination.
- Information on the Council's privacy policy is available on our website at www.dorsetforyou.gov.uk/your-council/about-your-council/data-protection/privacy-statements-for-purbeck-district-council.
- The Council will not accept any responsibility for the contents of comments submitted. We reserve the right to remove any comments containing defamatory, abusive or malicious allegations.
- If you are part of a group that shares a common view, please include a list of the contact details of each person (including names, addresses, emails, telephone numbers and signatures) along with a completed form providing details of the named lead representative.
- The Bere Regis Neighbourhood Plan and relevant supporting documents are available to view on the Council's website at www.dorsetforyou.gov.uk/neighbourhood-plans-in-progress. Hard copies are available to view at Westport House.
- Should you require any further information or assistance, please contact the Planning Policy team on 01929 557384 or francessummers@purbeck-dc.gov.uk.
- Send your completed forms to Neighbourhood Planning, Planning Policy, Purbeck District Council, Westport House, Worgret Road, Wareham, BH20 4PP or francessummers@purbeck-dc.gov.uk.
- Please tick this box if you would like to be notified of the decision following examination and referendum of the Neighbourhood Plan.



For Office Use Only
Processed:
Comment ID's:

Section 3: Basic conditions

Use this section to make comment on how well the plan meets the basic conditions. The basic conditions are what the plan will be tested against at examination stage. They are:

- Having regard to national policy;
- Having regard to local policy;
- Contributing to the achievement of sustainable development;
- Preserving and enhancing Conservation Areas;
- Preserving and enhancing designated historical assets; and
- Compatibility with EU obligations; and
- Meeting prescribed conditions related to the plan and prescribed matters complied with in connection with the proposal for the Neighbourhood Plan.

1. How well does the plan meet the basic conditions?

Comment – please use box below

We act on behalf of Mr E Butterfield of 1, Shitterton, Bere Regis.
In our professional opinion the Neighbourhood Plan does not meet the basic conditions.
The background to this matter is as follows:
Please see attached word document.

Please continue on a separate sheet if necessary

Please sign and date this form:

Signature: Diccon Carpendale

Date: 8th November 2018

How well does the plan meet the basic conditions?

Policy BR1 simply states “ the settlement boundary will be amended as shown on the proposals map (SE11)”.

The revision to the settlement boundary appears to be somewhat arbitrary but, more significantly, based on a false premise/understanding of the purpose that such a boundary should play and appears to have been as a result of a somewhat piecemeal approach looking at individual areas rather than applying a consistent methodology to the settlement as a whole.

It is noted that Purbeck District Council, when undertaking a settlement boundary review as part of the Purbeck Local Plan partial review in 2015, proposed the following approach to reviewing settlement boundaries.

Key features:	<ul style="list-style-type: none">• Boundary must be logical, easily identifiable and (normally) follow property boundaries and permanent features• Relates to the urban area and prevent undesirable sprawl• Adhere to settlement hierarchy by directing development towards the most sustainable location• Uses and developments with a clear social or economic relationship with the settlement (including sites within unimplemented planning permission)
Includes:	<ul style="list-style-type: none">• Uses and buildings (including sites with unimplemented planning permission) that have a clear social or economic function• Uses and buildings that relate better to the built form of the settlement than the countryside
Excludes:	<ul style="list-style-type: none">• Outlying development or small pockets of development that are clearly detached from the settlement• Rural exception sites for affordable housing• Open spaces at the edge of settlements, e.g. sports fields or allotments• Large, open residential gardens or paddocks• Important gaps• Uses that would not normally be found within the settlement boundary, e.g. agriculture or forestry• Camping and caravanning sites unless permanent year round residential occupancy
Methodology:	<ul style="list-style-type: none">• Public consultation• Meetings with town and parish councils

This provides a clear methodology so that a consistent approach can be taken to considering the position of settlement boundaries – particularly when these are being reviewed.

A Neighbourhood Plan is required to be in conformity with the Local Plan and it is respectfully suggested that the review of the settlement boundary should be re-visited applying this methodology.

Our objection is made on behalf of Mr E Butterfield and his land comprising residential property and garden and established business use (B2) at 1, Shitterton, Bere Regis.

It is clear that both in terms of the land use and physical development on the ground all of his land ownership (as previously submitted in objection to the draft Neighbourhood Plan) should be included. Whilst the revised settlement boundary now includes his dwelling and associated garden area it does not include the business use and associated buildings on land beyond his garden which have a clear economic function. Similarly, this use and the associated buildings relate better to the built form of the settlement than the countryside.

It is of interest that in reviewing the position of the settlement boundary at Shitterton, a significant area of land has been included to the south of Bridge House and Shitterton House which was excluded within the draft plan. Inclusion of this land runs counter to the established Purbeck District Council approach which makes it clear that large, open residential gardens or paddocks should be excluded from within the settlement boundary.

In the circumstances the LPA is requested to ensure this matter is re-visited and the boundary re-drawn as shown on the attached drawing 16114-01B which shows the proposed alteration with a red dashed line.

Officers of the LPA are well aware of the existence, extent and established nature of the commercial premises to the rear of 1, Shitterton. The LPA is therefore requested to ensure that Planning Officers are consulted regarding this site. Furthermore, the land owner and his representative are very happy to meet with the Neighbourhood Plan Officer on-site in order that she can appraise herself of the situation "on the ground".

Overall with the absence of any clearly defined/expressed methodology and criteria to be applied and utilised when undertaking the settlement boundary review, it is considered that the boundary review has, unfortunately, been somewhat inconsistent and arbitrary in its approach and should be re-visited.

The explanation within the supporting text that settlement boundaries (simply) identify the envelope within which development will be allowed is considered to be far too simplistic failing to recognise that it will also encompass all uses and developments with a clear social or economic relationship with the settlement (including sites with unimplemented planning permission). Similarly, it should also explain that the settlement boundary includes all uses and buildings that relate better to the built form of the settlement than the countryside and exclude large, open residential gardens or paddocks or small pockets of development that are clearly detached from the settlement.

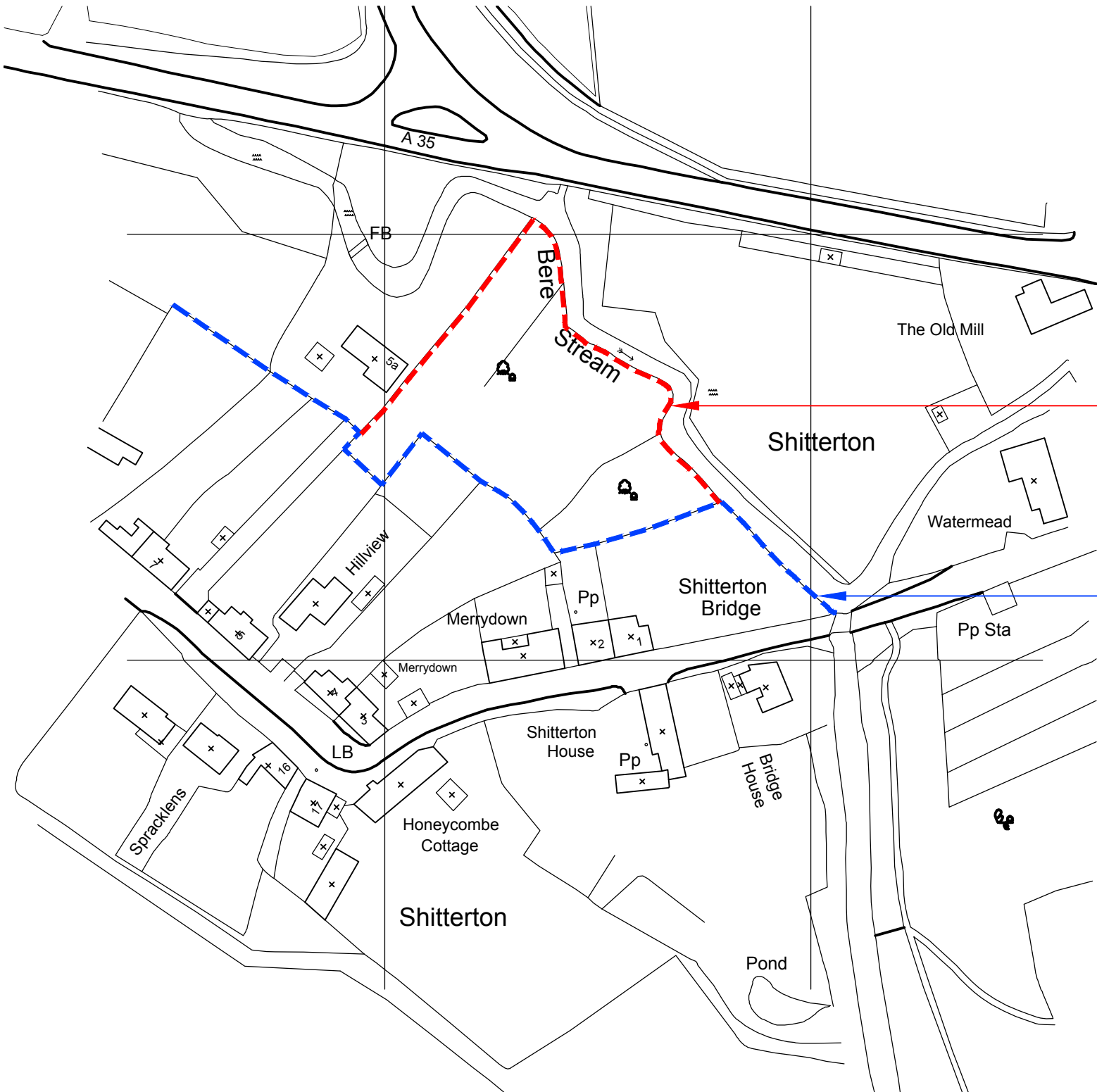
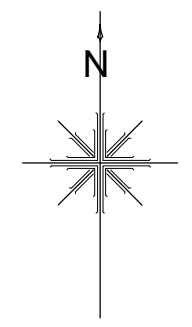
For the reasons set out above, the plan fails to properly contribute to the achievement of sustainable development as it fails to fully assess and consider how the plan will contribute to improvements in environmental, economic and social conditions by failing to give proper weight to existing business premises that form part of the settlement and should therefore be included within the settlement boundary. The lack of an appropriate methodology and assessment criteria when reviewing the boundary means that the plan is inadequate and inconsistent in this regard.

The Neighbourhood Plan cannot be in general conformity with the strategic policies contained in the development plan (and how these seek to secure sustainable development) if its approach to assessing the extent of settlement boundaries (within which development is likely to be found to be sustainable) is entirely inconsistent with the approach adopted by Purbeck District Council. In the absence of any rationale for the approach taken in the draft

Neighbourhood Plan or any substantive evidence to justify why the somewhat arbitrary approach has been taken, the plan must be considered not in general conformity with the strategic policies contained in the development plan.

This objection can be overcome by applying an appropriate methodology to the review of the settlement boundary and amending the position of the boundary as indicated on drawing 16114-01B.

Rev	Drn	Date	Description
-	-	-	-



Proposed alteration to settlement boundary.

Settlement Boundary in neighborhood plan regulation 16 Consultation.

Please note this plan shows only the proposed alteration to the settlement boundary for land Adj. to 1 Shitterton.

**BRIMBLE
LEA**

Chartered Architects
Planning Consultants & Surveyors
Wessex House, High Street, Gillingham, Dorset SP8 4AG
Telephone (01747) 823232

PROJECT
Shitterton,
Bere Regis,
Wareham,
Dorset

DRAWING
Proposed extension to
settlement boundary

SCALE 1:1250 @ A3

DRAWING ORIGINATOR DWR	DRAWING No. 16114 - 01	REVISION B
---------------------------	---------------------------	---------------

DATE 10.08.2018	
--------------------	--

© Crown Copyright 2007. All rights reserved. Licence number 100020449

