



## Part B – Representation

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

<input checked="" type="checkbox"/>	Submission Plan
<input type="checkbox"/>	Consultation Statement
<input type="checkbox"/>	Basic Conditions Statement
<input type="checkbox"/>	Other <i>Please specify:</i>

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

	<i>Location of Text</i>
Whole document	
Section	
Policy	39
Page	101 - 103
Appendix	

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

<input type="checkbox"/>	Support
<input checked="" type="checkbox"/>	Object
<input type="checkbox"/>	Make an observation

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

### Policy 39: Land adjoining the Bull Tavern

In our response to the Regulation 14 consultation on the Plan in January 2017 we highlighted the need for improved evidence to substantiate the sites proposed for development. We recommended liaison with North Dorset District Council's conservation team to verify their suitability.

We subsequently became aware of concerns which that team had over the allocation of land adjoining the Bull Tavern and in the autumn of last year carried out visits of the proposed sites with the Council's conservation officer. This confirmed that only the site in question generated significant heritage concerns and we provided detailed advice to the Council as to the reasons for this.

We are not aware of how this advice may have been passed on the community but we note that the Submission version of the Plan is dated September 2017 – before that advice was produced. SEA and related evidence documents were also produced before this date and while the Consultation Statement is dated February 2018 this makes no reference to further advice which may have come from the Council. That report does however make reference to the Council's original concerns on the site expressed in response to the Regulation 14 consultation (p9), and the community's response to that in terms of why it believes the allocation should remain and proposed modification of the policy wording to better reflect heritage issues (p27).

Based on our site visit last autumn it is our view that the site is unsuitable for allocation in principle.

The site lies at the eastern extreme of the conservation area on the south side of the A357. It sits between the Listed Bull Tavern and the unlisted historic Chapel. The latter in its location and set back from the road would have provided a discrete and (at the time of construction) relatively tranquil setting as a place of worship and contemplation as well as quiet respect for those buried in the associated graveyard. This character is not compromised by the workers cottages in front of the site

and the undeveloped green space all around the remaining three sides plays an important part in defining the positive contribution made by the chapel to the character and appearance of the conservation area.

The distance between the chapel and graveyard and the Bull as undeveloped open space is therefore key to protecting this character, especially given the Tavern's diametrically opposite social character. Development which effectively bridges the open gap between these two features and creates independent units of permanent human activity will as a consequence cause significant harm to the conservation area, exacerbated by the creation of any new access and car parking.

The agenda with the Bull itself is somewhat different. The building as a tavern is valued by the community and the primary purpose of the policy appears to be to facilitate enabling development which will assist in its resurrection as a viable commercial concern and secure its future as a Listed Building. A basic policy which confirmed a willingness to explore development which could achieve those objectives subject to criteria which sought to limit the amount of development to the minimum necessary would in principle be difficult to object to. But the policy conflates that objective – of development ancillary to and operationally necessary to the functioning of a tavern – with housing development for which there is no apparent need or justification in this area. The combination of ancillary development and standalone housing will no doubt create a critical mass of built form which encroaches severely on the open space separating the tavern from the chapel.

It is always difficult determining viability exercises for A3 or licensed premises as market value is determined by turnover and profit which itself is usually the product of individual management approaches. In the absence of a proposal from a specific operator with financial information to demonstrate as evidence what is necessary for their business to function effectively it is almost impossible to draft a one size fits all provision for the site in detail.

Our site visit showed that ancillary development along Common Lane and behind the site eating into the rising land to the east to a limited degree may be possible without causing undue harm to the conservation area or the setting of the Bull itself. Some level of harm to its heritage significance may be justified or offset by the benefits that would arise from securing its future, with clever and careful design helping to mitigate that which is generated.

This all suggests that a policy aimed at securing the future of the Bull would be acceptable in principle but worded in such a way that it did not open the door to speculative and unrelated development such as independent housing, with the quantum and type to be limited and justified by evidence on, and operational linkage to, commercial viability.

As the policy stands we do not believe that there is sufficient evidence to justify the level of significant harm to the conservation area or demonstrate that such development is necessary - and the only way - to ensure the delivery of public benefits ie securing the future of the Bull Tavern. As such we do not believe that the policy and thereby the Plan is in conformity with the provisions for the protection and enhancement of the historic environment as set out in Section 12 of the National Planning Policy Framework (NPPF).



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