

Our ref: SL/DUTS-00002-0001
 Your ref:
 Date: 21 March 2022

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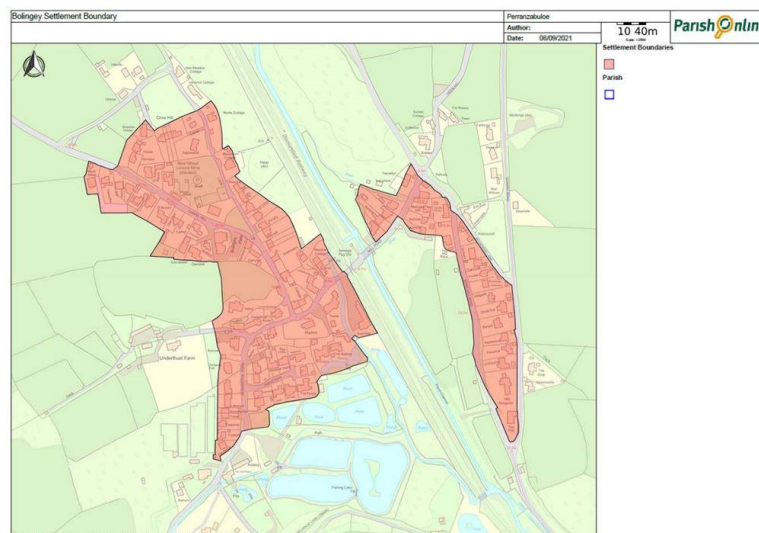
Dear Sirs

Perranzabuloe Neighbourhood Development Plan (NDP) - Settlement Boundary

We are instructed by [REDACTED] to provide the following representations on the proposed Neighbourhood Development Plan, in particular on the proposals around the Settlement Boundary.

Draft Definitive Settlement Boundary Maps – Bolingey Settlement Boundary

The Bolingey Settlement Boundary map image dated 6 September 2021 does not show both new developments PA18/04649 and PA19/08085 ("the Developments") and neither of the planning permissions PA20/08801 and PA21/02232 ("the Planning Permissions") which have been approved along the lower South-West edge of the Draft Definitive Settlement Boundary Map.




[Image A: As located in Appendix 2 – Draft Definitive Settlement Boundary Maps (Page 10)]

Please see a full scale version of this plan annexed to this letter]



KEY:
NDP Settlement Boundary (SB)
New Development S-W Boleingey
Proposed New SB for S-W Boleingey

Notes
REVISED Ref. Date Revision Detail 0 10/03/2020 Original
Client MR N DUTSON
Property Address PERRANZUBLOE NEIGHBOURHOOD
Drawing Title SETTLEMENT BOUNDARY ALTERNATIVE PROPOSAL
Job Number CH10188
Drawing No. 0001-88 Rev. 0
Scale: 1:1000 Paper Size: A3
Author: DH Checked By: DH
 Crossley Hill Chartered Surveyors Crossley Hill Chartered Surveyors 10a Lanyon Street, Truro, Cornwall, TR1 3LS enquiries@chsurveyors.com www.chsurveyors.com

[Image B: Plan demonstrating the new Developments and the Planning Permissions which lie outside of the NDP Settlement Boundary. Please see a full scale version of this plan annexed to this letter]

By reference to image B, whilst it is acknowledged that the planning application PA20/01675 lies within the edge of the proposed Neighbourhood Development Plan Settlement Boundary, both new Developments (PA18/04649 and PA19/08085) and the Planning Permissions (PA20/08801 and PA21/02232) which lie outside this boundary appear to have been omitted from consideration.

Defined Settlement Boundary Guidance and Settlement Boundary Review

Criterion 4¹ of the defined settlement boundary guidance document states that:

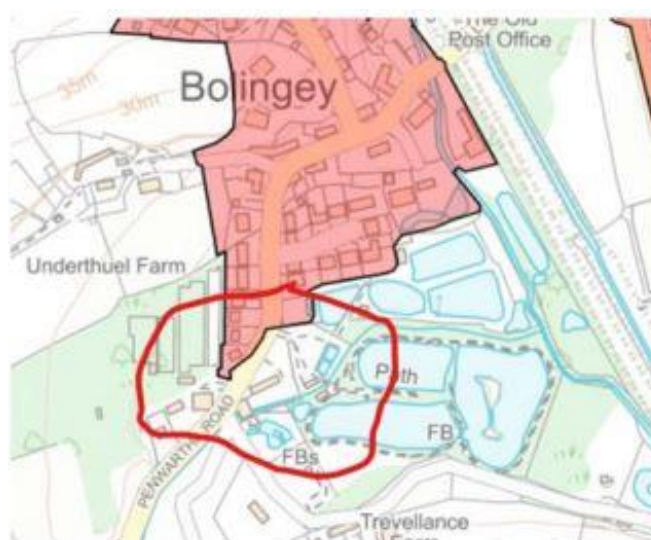
'Settlement boundaries should include commitments for built development on the edge of a settlement (e.g. outstanding but still valid planning consents for housing), except for Exception sites for housing that have not yet been built and similar situations where higher-than-standard proportions of AH have been successfully negotiated on existing permissions.'

¹ Microsoft Word - Appendix XX Criteria for defining SBs, Rev 3 June2021.docx (perranplan.co.uk)



By reference to the available planning permission information, neither of the Planning Permissions meet the affordable housing or exception site component of this exception; these planning permissions should therefore have been considered when establishing the settlement boundary for this Neighbourhood Development Plan. Whilst Martin Lee and two senior Cornwall Council planning officers considered there to be 'no hard and fast rules re setting SB's' and that 'the key was to have a consistent logic',² this is a clear diversion away from the established guidance published on the Parish NDP website.

It is acknowledged that page 9 of the Perranzabuloe Settlement Boundary Review highlights the 'lower density' and 'less integral' part of the South-West edge of the settlement boundary. Yet, it is not clear why these two new Developments and the two new Planning Permissions, whose information would have been available at the point of consideration at this meeting, have been excluded.



[Image C: Bolingey Settlement Boundary located (South-West edge) as located in the Perranzabuloe Settlement Boundary Review (Page 9) (2021-08-31)]

By reference to image C, the exclusion of the new Developments and Planning Permissions from the Settlement maps being reviewed by planning experts, perhaps places into question the objectivity of the analysis of the SW Bolingey Settlement Boundary. Where the plans on page 9 do not identify these planning developments,³ this puts into question whether these were seen and assessed by the panel of experts who reviewed Bolingey's settlement plan.

To stop at a point where known developments are due to take place is not logical. Whilst criteria 9 of the settlement boundary guidance states '*isolated or sporadic development which is clearly detached from the main built-up area of the settlement should be excluded,*' considerations of these new Developments and permissions would have further highlighted the lessening of any sporadic

² Microsoft Word - SB Review - 2021-08-31 - notes with CC + Martin Lee comments.docx (perranplan.co.uk) (Page 2)

³ Microsoft Word - SB Review - 2021-08-31 - notes with CC + Martin Lee comments.docx (perranplan.co.uk) (Page 9)



nature. By reference to the attached updated plan reflecting the positioning of the new Developments and the Planning Permissions, there is sufficient evidence that this area of land should not be considered 'isolated or sporadic' and justifies the extension of the proposed Settlement Boundary to include them.

These planned developments and permissions indicate the transition from an area of previously 'low density' to one which will imminently change. In connection with Criterion 1 of the settlement boundary guidance, these developments '*are likely to have a degree of permanence.*' Certainly, once built, these new Developments shall have the degree of permanence to satisfy this criterion. Although not all of these planned developments have been constructed yet, the Planning Permissions are indicative of upcoming change.

As per the Parish website, the Settlement Boundary Review by external experts was last updated on 6 August 2021. PA20/08801 was validated 21 October 2020 and the decision issued on 11 December 2020. PA21/02232 was validated on 17 March 2021 and the decision issued on 19 July 2021. As for the Developments, PA18/04649 was completed in 2019 and the structural work for PA19/08085 was completed early 2021. Such information demonstrates that there was ample time for these planning applications and the Developments to have been considered in the review of settlement boundaries for this NDP and for the map information to have been updated in accordance with such information. The observed omissions of the above planning information thus raises concerns that the review by the planning experts may have been prejudiced by the lack of up-to-date Settlement Maps available for analysis.

Ultimately, it is a matter of importance that the Settlement Boundary includes the new Developments and the approved Planning Permissions in order to apply the proposed policies (particularly 'Policy SD1: Settlement Boundaries') in the Neighbourhood Development Plan for Perranzabuloe effectively.

Yours faithfully



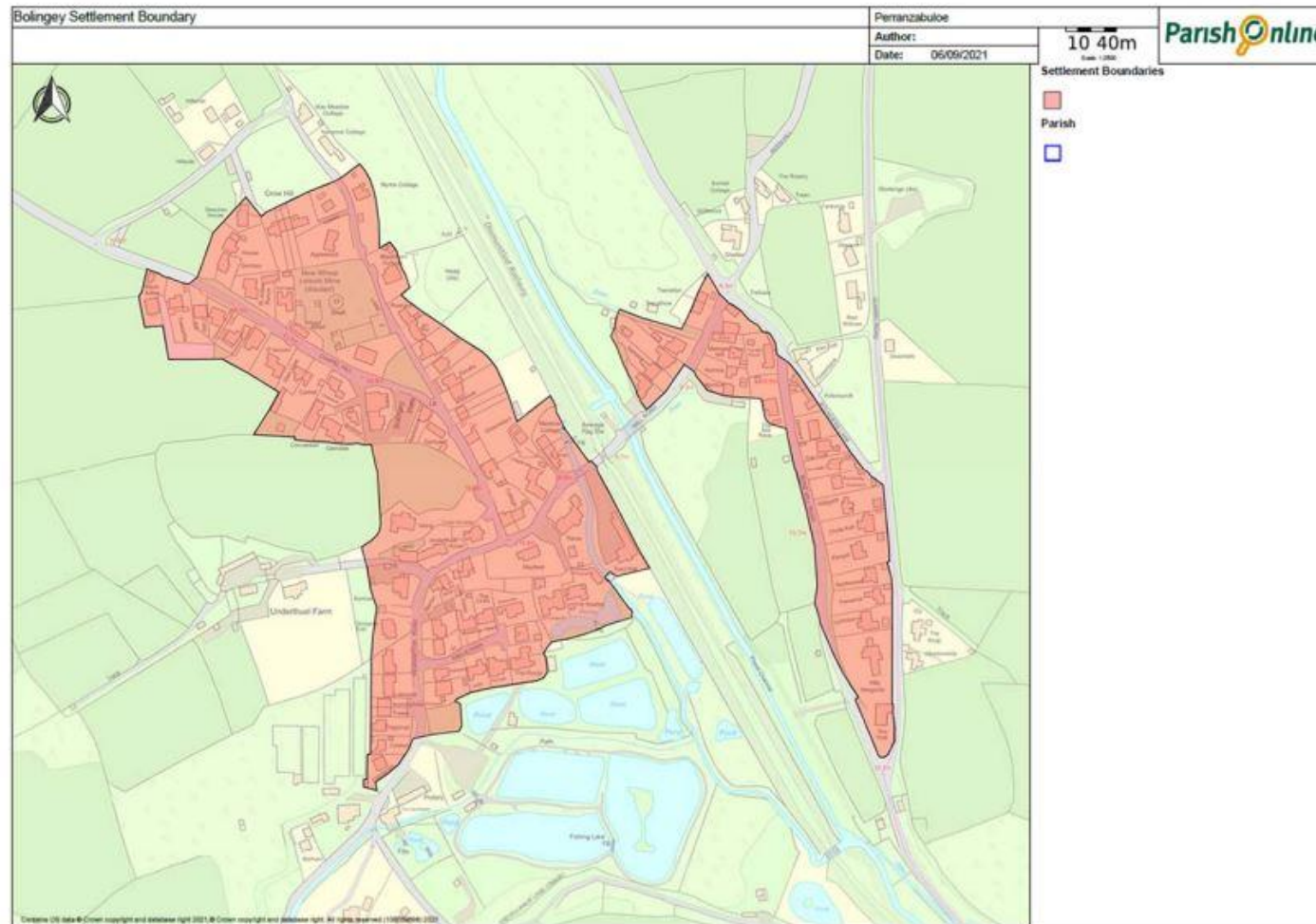
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ANNEX 1 – Image A

As located in Appendix 2 – Draft Definitive Settlement Boundary Maps (Page 10)




ANNEX 2 – Image B

Plan demonstrating the new Developments and the Planning Permissions which lie outside of the NDP Settlement Boundary



KEY:

- NDP Settlement Boundary (SB)
- New Development S-W Boleingey
- Proposed New SB for S-W Boleingey

Notes		
Revisions		
Ref	Date	Revision Detail
0	XX/XX/XXXX	Original
Client		
MR N DUTSON		
Property Address		
PERRANZUBLOE NEIGHBOURHOOD		
Drawing Title		
SETTLEMENT BOUNDARY ALTERNATIVE PROPOSAL		
Job Number		
CH19188		
Drawing No: 0001-08 Rev: 0		
Scale: 1:1250 Paper Size: A3		
Author: DH Checked By: DH		
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