



**Hall & Woodhouse Ltd c/o Southern Planning Practice (Lynne Evans)**

**ID No 748**

**ISSUE 1: Qs 1.5 and 1.7 – 1.11 (inclusive) – Removal of Settlement Boundaries outside of the Four Main Towns**

Questions 1.5 and particularly 1.7 – 1.11 (inclusive) are a series of related questions which relate to the strategic direction of policies towards all settlements outside of the four main towns, including the removal of their settlement boundaries so that they become 'countryside' where policies of strict restraint will apply.

For the reasons expanded upon below, it is contended that the strategic approach is not sound; it is certainly not consistent with national policy in the National Planning Policy Framework (Framework) or the Planning Practice Guidance (PPG); nor justified or positively prepared.

As a result of the detailed responses provided to Questions 1.7 to 1.11 below, it follows that the Council's core spatial strategy under Policy 2 is not considered justified and consistent with the Framework and in particular paragraphs 17 and 55. The policies and proposals in LP1 as they relate to all settlements outside of the four main towns will not contribute to the sustainable growth of the district.

**Q. 1.7**

If LP1 is adopted as proposed, the strategic background for all settlements outside of the four main towns would be that they would have no settlement boundaries and would for policy purposes be in the countryside with very restrictive policies applying in relation to future development. The strategic policy in terms of housing numbers (Policy 6) although couched as a minimum is only 230 across the plan period for all these settlements.

There is no justification for this figure - this figure is not based on any analysis but as paragraph 5.21 of LP1 indicates is simply the left over figure once the Council had distributed its overall figure to the main towns (basis of which is questioned elsewhere). It certainly does not reflect the proportion of the population living outside of the four main towns, nor previous demand for housing and employment in such areas, the development opportunities or any objectively assessed housing need. It certainly does not reflect national guidance to support thriving rural communities.

Whilst there may not be many opportunities for significant development in these settlements, it is clear from previous development rates that there is an opportunity for a steady flow of smaller scale development to assist the long term viability of these settlements and their services and facilities. This is important to ensure that the development plan is fully supporting thriving rural communities.

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### Q. 1.8

The Inspector, in this question, has highlighted the very real concern that the Council's policies to remove all settlement boundaries will indeed lead to uncertainty and act as an impediment to sustainable development in these locations. First there is no certainty as to if and when there will be a more detailed planning strategy developed for any one of the many settlements outside of the main towns, either through a Neighbourhood Plan or future Development Plan. The vast majority of the district would simply be left covered by policies of restraint with no positive encouragement to meet future change and growth. Secondly even if Neighbourhood Plans or a future Development Plan comes forward, there is no clear guidance as to how such plans could promote a more positive future for these settlements on the basis that these plans must be prepared in accordance with the strategic policies in LP1.

The Framework and the PPG are quite clear that in order to achieve thriving rural communities, the continued provision of a range of facilities and services is essential and goes on to advise that in order to achieve this rural housing is essential.

The fate of public houses is well documented at a national level and Hall & Woodhouse's experience is no exception, particular the decline of the rural pub. A tight policy of restraint which would offer little or no likelihood of future growth and limited opportunities for the pub itself to develop or diversify would only serve to accelerate this cycle of decline. To stand any prospect of success these rural pubs need to be in the heart of thriving communities and furthermore need to have the opportunity to develop and diversify to overcome the many economic hurdles they face. This will not be possible in the restraint framework being proposed.

### Q 1.9

This question highlights the concern that rural communities that are currently viable and thriving could face a downward spiral of decline, if no positive planning encourages appropriate housing and economic growth.

Furthermore, the proposal in LP1 that the future of these settlements would either be by way of neighbourhood plans or opting in to Local Plan Part 2 leaves most of these settlements in an unknown period of stagnation and uncertainty which is wholly against the national objective to support thriving rural communities.

The Council has indicated that only just over 50% of parishes expressed an interest in preparing a neighbourhood plan and on current evidence the take up has been relatively slow and progress also

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slow. This also adds to the uncertainty; the most certain outcome is that if LP1 is adopted as proposed, all these settlements are faced with a strategic framework of restraint. This is completely contrary to the objectives of the Framework.

Furthermore it is also contrary to paragraph 17 of the Framework which sets out that plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. The only outcome that could be certain for any application seeking to generate development in these settlements would be refusal against a strategic framework of very restrictive policies.

#### **Q.1.10**

Part of the question is primarily for the Council to address in terms of their justification for the removal of settlement boundaries and alternative options considered.

However, it is not considered that the approach taken by the Council can be justified; it is plainly not consistent with national guidance to secure thriving rural communities. It is quite clear from the Council's response to the Inspector's question 4 that most of these villages are not isolated small hamlets or groups of houses. There are over 50 villages affected, of which of the 10 facilities considered as of 2015, over half of them have 5 or more of the listed facilities, and many have other forms of employment development. Indeed only one is listed with only one facility. These are currently thriving communities and the approach is entirely contrary to Section 3 of the National Planning Policy Framework which specifically requires planning policies to support a prosperous rural economy.

The Council's approach is completely at variance with such an approach and without wishing to sound over dramatic, could push these villages and their communities into a downward spiral of decline by unnecessarily and inappropriately restricting change and development.

Whilst it is acknowledged that many of the villages are more reliant on the private car rather than public transport, this is a characteristic of most rural areas, and a policy to prevent further growth will not reverse this position. Indeed paragraph 29 of the Framework explicitly recognises that different policies and measures will be required in different communities and will vary between urban and rural areas. It is contended that it is an unrealistic and over simplified approach which appears to take the view that if there is not alternative public transport provision and therefore greater reliance on the private car then further growth within a settlement is not sustainable. Paragraph 34 of the Framework explicitly suggests that the objective of sustainable transport modes needs to take account of policies set out elsewhere in the Framework, particularly in rural areas.

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The Inspector has asked for the appropriate way forward and it is strongly argued that at the very least, the settlement boundaries for all the settlements should be retained until they can be reviewed in detail either through a neighbourhood plan or through a further Local Plan.

Furthermore the Plan should set out a settlement hierarchy to indicate the different roles of the various settlements recognising that some of the larger villages perform a role to support smaller villages and hamlets. This would be more in line with earlier drafts of the Plan. Whilst specific housing numbers may not be appropriate, a more positive policy framework needs to be provided to ensure that development is encouraged to support thriving rural communities.

There should be a presumption in favour of development within the settlement boundaries.

#### **Q1.11**

The strategic policies of LP1 do not offer sufficient and appropriate 'hooks' on which to 'hang' neighbourhood plans. Indeed paragraph 5.26 of LP1 purporting to offer supporting explanation of Policy 2 is indicative of the lack of a clear steer for the preparation of neighbourhood plans. It indicates that the figure of at least 230 homes should not be seen as a target or a cap on the overall level of housing that should take place in the countryside – it is simply the amount that needs to be provided outside of the four main towns to ensure that identified district-wide need is met.

This offers no guidance to individual communities and indeed the very restrictive policies that are applied to the countryside suggest that the only housing to be provided to meet local and essential rural needs.

The strategic policies of LP1 should set out a settlement hierarchy to indicate the different roles of the various settlements recognising that some of the larger villages perform a role to support smaller villages and hamlets. This would be more in line with earlier drafts of the Plan. Whilst specific housing numbers may not be appropriate, a more positive policy framework needs to be provided to ensure that development and redevelopment can be promoted within these boundaries and if appropriate further growth at the edges to support and endorse thriving rural communities.

LJE/Southern Planning Ltd 18/02/2015

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