

From: john pybus
Sent: 06 March 2023 14:43
To: Neighbourhood Planning
Subject: Kings Somborne Neighbourhood Plan - Regulation 16 Consultation

I have lived in Kings Somborne for 43 years, am a retired professional planner, and have a number of comments to make on the KSN DP Regulation 16 Consultation. I would have made these observations on the Consultation Form as requested, but with limited time I could not find one on either the Kings Somborne PC or TVBC websites, and so I trust these observations by direct email are in order and will be taken into account in the Borough Council's response to the Consultation (KSN DP Reg 16 Consultation). I was briefly involved with the NDP Steering Group at the very beginning of the process and have made comments at every stage since the original launch in 2015.

Overall, the progress of the NDP to this stage is the result of a great deal of work by a number of committed people in the Parish, for which we should all be very grateful, as well as acknowledging the professional support from Test Valley planning staff and external consultants. However, I have to say that I have a number of misgivings about aspects of the Plan as it is at this Regulation 16 stage.

- 1) A point of particular significance is that the NDP has been considerably delayed, and whereas I believe that Kings Somborne was the first Test Valley parish to launch its NDP, many parishes in the Borough have now overtaken it in terms of progress towards being 'made'. The pandemic, of course, has contributed to delay but it is now well over seven years since the launch on 16 December 2015 and the Parish was then promised a 'made' NDP in a year. What this delay means is that the initial 2016 general and subsequent Action Hampshire household surveys of 2016/17 are so now out of date that really little can be relied upon them. The population has changed to some degree, and people who expressed housing needs at the time will almost certainly by now have satisfied these needs here or elsewhere. Furthermore, with national concerns about housing especially and impending changes to the planning system, peoples' views about the Parish may also have changed. Realistically, these surveys can no longer be relied upon as a current representation of local views.
- 2) Notwithstanding the above, I have major reservations about the way that housing need in the Parish has been assessed, and I have said so constantly in written representations since the whole process started, effectively with the 2016 household survey. I am familiar with the relevant guidance in the *National Planning Policy Framework (NPPF)*, in the supporting *Planning Practice Guidance*, updated in June 2021, and in *Neighbourhood Planning – How to undertake a Housing Needs Assessment*. However, none of this advice really addresses the fundamental dilemma which I see at the heart of the KSN DP approach to housing, and probably many other NDPs, which is accommodating the market housing needs of households already living in Kings Somborne who may want to upsize or downsize to a more suitable dwelling in the village. At the time of the 2016 questionnaire survey, 77% of households in the whole Kings Somborne parish were owner occupied, although in Kings Somborne village this proportion is undoubtedly less because of the relatively high number of Local Authority dwellings, arising largely because of Sir Tommy Sopwith's legacy. However, owner occupation in the village is still predominant and very significant.
- 3) The narrative in paras 4.8 to 4.12 of the KSN DP Reg 16 Consultation is clear that the housing proposals are based fundamentally on the needs of local residents, both in terms of market and affordable housing. I suggest that this is an utterly erroneous approach. No local

authority, Borough or Parish, can have any control over the ownership or occupation of market dwellings, and developers will sell to whoever is willing and able to purchase at that point in time. Furthermore, depending on a variety of factors including the housing market generally, developers may not be willing to build to the dwelling mix postulated in policy KS/H2. I recognise that with affordable housing in its various forms the situation is very different and provision has to be made more locally. The Borough Council is able to quantify this need from its waiting list and other data. However, affordable housing is required to be provided under Review Borough Local Plan policies (RBLP) as part of any market housing scheme, and presumably there would be control of occupancy of such dwellings. Furthermore, there are community led schemes permitted beyond the settlement boundary as provided for in the RBLP which could provide for affordable housing. And so some affordable housing, whether or not for Kings Somborne residents specifically, would be provided in any site allocated for development.

- 4) A more appropriate assessment of housing need would be via a more simple approach. The RBLP provides for 648 new dwellings in the rural areas of Test Valley in the plan period to 2029. Kings Somborne, in common with the other more substantial and well serviced villages in Test Valley would need to consider whether in principle some contribution towards this overall need would be appropriate. And additionally, would the settlement benefit from some additional growth? In assessing future housing provision in the village, I suggest that regard should be had to paras 78 and 79 of the NPPF where it is suggested that development should be located such as to enhance the vitality of a community and provide for market housing where it would significantly increase affordable housing. An Infrastructure Group was set up to assist the preparation of the NDP, but whilst it provided a comprehensive assessment of existing facilities and services, it did not look specifically at their present viability. One thinks immediately of the three 'Ps' – the post office, the primary school and the public house, and these surely should have been the subject of individual examination, but there should be some similar assessment of all facilities and services. Any assessed need for additional housing would then be considered against environmental factors and constraints. In my view one is not looking for a precise number of new dwellings, rather, depending on the sustainability test and the public's general views about growth, one or more sites. Whilst census data, small area population forecasts, past building rates and population projections by age group are all very interesting and are very relevant in assessing housing need at the District/Borough level, I suggest that they have little significance at the 'macro' level of a Parish.
- 5) Turning to the housing site allocations, I view these against the background that Kings Somborne has some of the most outstanding surrounding countryside of any village in Test Valley, apart possibly from settlements in the north of the Borough within the North Wessex Downs Area of Outstanding Natural Beauty. And this countryside has no special protection other than the general national and Borough Plan policies for protecting the countryside. It follows in my view that one should look very critically at any proposal which involves development beyond the settlement boundary as established in the RBLP.
- 6) Site ALL 1 has been favoured since the beginning of the NDP process, but in my view it has significant shortcomings which have not been recognised in any of the stages of the Plan. The site is on rising ground and is part of a much larger area of open land bounded by the A3057, New Lane, and housing in Winchester Road, Riverside Green and Muss Lane, which has no significant internal boundaries and is seen as one large and very visible area of pasture traversed by a public footpath. In addition to the factors considered by the consultants employed to evaluate all possible sites, one must surely look also at the degree

to which any site can be 'contained' given its particular location and physical features. What concerns me about most about this site is what it would lead to. Given a more buoyant economy and the more concerted pressures from the housebuilding industry which have been seen in past building 'booms', it is difficult to see how the further development of this large area could be resisted, notwithstanding the constraints which the NDP proposes with the 40m contour restriction. As a simple illustration of the potential precedent implications of the ALL 1 site, no developer surely will be prepared to construct a long access road from the A3057 to the site, which as presently proposed in the NDP would serve nothing for most of its length, without some more development to justify its considerable cost? In my view this site should be dropped as a housing site.

- 7) Site ALL2 was introduced as a housing site at the Regulation 14 stage, and quite frankly it shocked not only myself but several others who have a keen interest in planning matters in the Parish. It is part of the larger site which was the subject of fairly recent planning applications for housing development by Gladman, and which was roundly opposed by the local residents, the Parish Council and refused twice by the Borough Council. An appeal against the first refusal was withdrawn. To permit housing on part of the site – which does not appear to follow any logical boundary – would be to substantially weaken any case against the remaining land being developed. The main and most compelling argument against the Gladman proposals, namely the visual impact and lack of sympathy with the form of the village, would be largely lost if permission was sought on the remaining land. For these reasons I feel that this site is also unacceptable.
- 8) Site ALL 3 now has planning permission for 18 dwellings and a relocation of the existing allotments, but with an area of 1 hectare this represents a fairly low density, and in some measure represents a wasted opportunity. Given that housing needs generally, whether from within the Parish or elsewhere, are predominantly for lower cost market housing as well as affordable housing, the NDP could be used to encourage a larger number of dwellings. I realise that the developer Shoreditch Homes specialises in the lower density end of the market and with permission granted may well want to build to that scheme. However, more houses here on a site which is within the settlement boundary would reduce needs elsewhere.
- 9) The site KS3 in the Regulation 14 NDP, and now removed, seems a far better site overall than either ALL 1 or ALL 2. It is low lying, better related to the centre of the village, and has sufficient natural features for it to be contained and not lead to other development.
- 10) With regard to policy KS/E3 and the identification of Local Green Spaces (LGSs), I am sure that residents welcome this policy as a means of protecting these areas. However, three to my knowledge are in private ownership, namely LGS4 (opposite the Old Vicarage), LGS11 (Behind Manor Farm) and LGS9 (Up Somborne Down). I understand that any proposed development is treated as though the site is in a Green Belt, but what control is there if work not constituting development but harmful to the appearance and character of the LGS is carried out? Has there been prior discussion with the owners of the areas with a view to them accepting the designation and managing these areas responsibly? I believe historically the owner of LGS4 accepted its designation as an important open area in the 1987 Conservation Area review, but I am not sure whether this remains the position. But what of the other two? It is noteworthy that LGS11 is I believe a SHEELA site and so one would hardly expect much cooperation there.

- 11) The sections of the NDP on Conservation, Flooding and Water Management and Biodiversity appear acceptable and are well supported with specialised input from Consultants. The section on Community Facilities and Infrastructure I feel, as stated, should have examined their viability based on the existing population. I feel the Design Guidance in Appendix 4 is excellent and much needed. Possibly it could be used as a 'template' for other parishes preparing NDPs, suitably adapted? I think it unfortunate that the NDP doesn't really deal with employment in the village, which might have resulted in the allocation of a small site for appropriate uses and helped in the general quest for sustainability.

- 12) Finally, it is not for me to question whether this Regulation 16 NDP meets the 7 tests required for it to proceed to a referendum but obviously the Council has to do so. I understand that these observations will be made public and I give my contact details below. I would appreciate being informed of the Council's decision to make the NDP. Should the Independent Examiner hold a Public Hearing, I would be pleased to attend, or alternatively provide any further information that he or she might require.

John Pybus