

**From:** Andrew McGrenra <[REDACTED]>

**Date:** 7 April 2022 at 20:11:54 HKT

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** Local Plan 2040 - Comments

I have the following comments to make regarding the draft Local Plan 2040 and I would be grateful if these could be carefully considered:

#### Spatial Strategy

- the issues and options consultation paper purports that there is support for more housing allocation to rural areas/villages. In my view, this seems in large part to be supported by those with a financial interest in this happening, either developers or those landowners with ownership of potential sites, and is clearly not settled or supported consensus amongst residents. The draft plan housing allocation would appear to strongly indicate development outside settlements boundaries and on green field sites will be TVBC policy in the future. This is not a positive policy as it is contradictory to responses published in the issues and options consultations paper with regard to settlement boundaries (upon which the draft plan is now specifically silent) and does not allow for a democratic process in local decision making. A more positive policy would be to propose a democratic system whereby residents of rural settlements would have an irrevocable final say on development proposals and allocation of sites;

- further to the above, the issues and options consultation paper concedes that there was broad support for maintaining the settlement boundaries, although TVBC makes absolutely no mention of this in the Local Plan 2040, nor indeed is there any further discussion on this matter in the draft. And yet it now proposes allocating sites from the SHELAA, the vast majority of which clearly lie outside the settlement boundaries. This is not a positive policy as there is no consistency to this approach, which tends to suggest consultation responses are hand picked to support given objectives. I would also note that once the principle of building outside settlement boundaries has been accepted there will inevitably be a deluge of planning applications for development on sites surrounding many rural settlements. These will be extremely difficult to resist legally once precedent has been established. Unfortunately this has been seen time and again across other parts of the country with villages practically encircled in a matter of a few short years. This is not a positive policy and does not sufficiently recognise the potentially unintended consequences of such a plan. A more positive policy would be to clearly recognise this possibility and make it transparent to residents of rural settlements in order that they may make more informed decisions;

#### Settlement Hierarchy Assessment

- the definition of "good transport links" in the assessment of settlement hierarchy is not realistic and does not reflect that these intermittent bus services will not discourage car usage. Nor does it truly represent the additional car usage that will inevitably arise by allocating relatively large housing developments adjacent to small rural communities. It is not a positive policy as it is not realistic. A more positive policy would be to recognise the reality that additional housing should be located much closer to large towns that are visited on a far more regular basis and provide much more in-demand services and destinations such as workplaces, main line rail services, larger more competitively priced shops, cinemas, gyms, theatres etc. These are indisputably the services and destinations that are predominantly used by residents of rural settlements ;

- the points system for the Settlement Hierarchy makes no sense as described, and is seriously flawed in its predicted outcomes in terms of reducing car usage. Small rural shops, for example, are

largely unable to be competitive in their pricing and do not discourage car usage for the vast majority of residents. This is not a positive policy as it ignores the day-to-day reality of travel and means of travel. A more positive policy would be to more comprehensively research and recognise these realities and adopt a housing allocation strategy to match;

- the settlement hierarchy assessment, as expounded in the draft plan, assumes that this points based system reflects what residents want and what is needed to maintain and sustain the facilities that are identified. It also assumes that additional development is needed to sustain these facilities. This is a seriously flawed assumption. Residents of rural settlements are fully aware of what it takes to sustain their facilities and, where they are threatened, they make considered choices in terms of the need for development. They are, when all said and done, the guardians of their communities and the people with the most to gain and the most to lose. With reference to Goodworth Clatford, all of the physical facilities are functioning well. Residents are also fully capable of recognising the very real possibility of certain facilities being overwhelmed by overdevelopment. As proof, 95% of residents who voted approved the positively prepared Neighbourhood Plan which very clearly and specifically advocated maintaining the settlement boundary. This overwhelming democratic decision has been replicated in many other rural settlements that have undertaken similar planning exercises. The settlement hierarchy assessment is not a positive policy as it seems to assume that residents of rural settlements are not the best judges of the viability and sustainability of the facilities in their settlements and are not considered capable of making decisions on these matters. A more positive policy would be to accept that residents of these settlements are the best informed to decide these matters at a local level and to accept the democratic process by way of positively prepared and accepted Neighbourhood Plans;

#### Housing Policy

- the language and tenor of the whole draft Local Plan indicates that this push to allocate significant further development towards rural communities is no longer a consultation, but rather settled policy. This is not a positive policy. I believe it would be more positive to assure residents of villages that their views will be taken into account and that they will be given a final say on development locations, by way of referendum or other means. This should be seen as a very positive policy in those villages which have expressed an overwhelming desire to maintain local gaps and/or settlement boundaries through democratic means;

- the dismissal of any further consultation or consideration of building new garden villages/towns is confusing and contradictory. The claim within the housing policy documents that these cannot be developed within a reasonable time frame bears no scrutiny. The Local Plan 2040 is effectively a 16 year plan, and to suggest this is not a sufficient time scale to potentially enact these proposals is scarcely credible. This is not a positive, proactive or enlightened policy. A positive policy would be to seriously further investigate these proposals, especially given the prolonged time scales available;

- additional reasons put forward by TVBC for discounting the proposal to construct new garden villages/towns in the draft plan are that they may entail additional building on green field sites and outside settlement boundaries/ or within local gaps. And yet the spatial strategy and settlement hierarchy documents clearly indicate that new development is highly likely to be allocated to rural settlements, and clearly to be allocated from the SHELAA list. A considerable majority of these proposed developments on the SHELAA list are either outside current settlement boundaries, fall within current local gaps, would involve the use of currently green field sites, or often all of the above. This policy is not positive as it is contradictory. A more positive policy would be to clear up any contradictions and clearly confirm a policy that avoids any plans for development on green field sites or outside current settlement boundaries/within local gaps also applies to SHELAA sites;

- potential new garden villages/towns allow for a considered and holistic planning policy , whereby the necessary infrastructure and sustainable facilities can be planned from the ground up. Disregarding this development potential is not a positive policy. A more positive policy would be to further investigate these proposals in order to not circumvent the clearly stated democratic wishes of the residents of rural settlements such as Goodworth Clatford;

- the broader draft Local Plan is also silent on the very important and specific subject of settlement boundaries, of which I can find no mention, even though replies to the issues and options consultation paper clearly showed a positive response across the Test Valley borough to maintain current settlement boundaries. This was especially true of villages such as Goodworth Clatford and their positively prepared Neighbourhood Plan, which bears repeating voted by over 95% in favour of maintaining the current settlement boundaries. This is not a positive policy as it seems to deliberately ignore, by exclusion, the views expressed in the issues and options consultation paper. A more positive policy would continue to recognise and include these democratically endorsed views, and assure rural settlements that they will be afforded a democratic final say on proposed developments;

- according to the draft plan, the Northern Test Valley (NTV) area will attract a significantly disproportionate number of future development sites according to both the settlement hierarchy assessment and the broader calculations of housing need between NTV and Southern Test Valley (STV). Overall, NTV will be required to provide almost 400% more housing allocation than STV. This will be especially true of the NTV rural settlements which will be required to build significantly more homes than similar STV settlements as there are only three Tier 3 settlements identified In NTV. This is not a positive policy and may attract considerable resentment due to this unfair and unequal distribution of housing across TVBC. A more positive policy would be to further re-assess the distribution of housing in the interests of proportionality and fairness.

I fully understand that the Local Plan needs to be a positively prepared policy document. I hope that where I believe the draft plan is not a positive document, my comments on where positive improvements can be made will be carefully considered.

I would be grateful if confirmation of receipt of this message could be sent.

Yours sincerely,

Andrew McGrenra

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Sent from my iPad