



# PRE-SUBMISSION SOUTH DOWNS LOCAL PLAN

## Position statement on behalf of Ms F Hodell (R233)

### Matter 2 Strategy (policy SD25)

#### **Introduction**

1. This position paper concerns the SDNPA proposal to redraw the settlement policy boundary (SPB). It should be read in conjunction with the representations previously submitted on behalf of Ms F Hodell. The current SPB for Buriton was established in the Petersfield Area Local Plan in the 1980s, then the East Hampshire District Local Plan in the 1990s and into the subsequent First and Second Review Plans. The adopted East Hampshire Joint Core Strategy carried the SPB forward to 2028. Buriton's SPB is thus some 30 years old.
2. The SDNPA has reviewed the Buriton SPB and proposes to redraw it to exclude my clients land at Windyridge, Bones Lane. The settlements with SPBs are listed in policy SD25.

#### **General Approach**

3. The NPA justifies its proposed redrawing of the SPB on the basis of a *Settlements Facilities Study* in 2015 and an earlier *Settlement Hierarchy Study* in 2013. Both documents are flawed and unsound to form the basis of a development strategy. The original representations explain why that is. That aside neither of those documents have any bearing on redrawing the boundary as they are more to do with the existence of SPBs for settlements.
4. The redrawing of the Buriton SPB and other SPBs for that matter is a key issue for the SDNP and is counter to the Government's aim to fix the broken housing market. This is because for every redrawing of the SPD they are almost all a reduction in the area enclosed by an SPB and the opportunity for windfall development through infilling or a little

rounding off is lost. Adjusting and shrinking SPBs across the settlements of the SDNP works against the principle of boosting the supply of land for housing (let alone significantly boosting supply) and compensating for under provision for housing and not meeting the objectively assessed need (OAN) for housing.

5. The double whammy of under provision and then weakening the ability for windfall development flies in the face of fostering the social well-being of the communities of the NP. The SPB for Buriton has been in existence for over 30 years and has facilitated a modest level of redevelopment and infill development. None of that development has had an adverse effect on the wider landscape of the former AONB now NP.
6. There is a national Housing crisis and a primary objective of the Framework is to 'boost significantly the supply of housing'. Reducing the extent of SPBs runs counter to that objective if it stifles the provision of further housing especially when sites within or on the edge of villages have little effect on the wider landscape of the NP.

#### **The settlement policy boundary**

7. The first point to reiterate is that shrinking the SPB works against what should be an underlying principle for the SDNP LP to make the best of the opportunities the physical lie of the land makes to contribute to housing provision. This is especially important when SDNPA will not be meeting its OAN for housing. Indeed it almost becomes imperative that development opportunities within existing settlements are not overlooked and no stone is left unturned in delivering as much new housing as possible consistent with the duty to foster the social and economic well-being of the Park's communities.
8. Placing the whole property at Windyridge in the countryside is uncalled for and not justified by the methodology used to assess settlement policy boundaries - *SDNPA Settlement Policy Boundary Review: Methodology Paper* - extract at [Appendix 1](#). The justification was stated to be the exclusion of a large house in a large plot, set back from the road. Windyridge is not a large house, neither is it set back from the road. Furthermore it is not affected by the proposed local greenspace designation nearby.
9. Looking at the methodology and applying it to Windyridge it is apparent that the house recognisably forms part of the settlement pattern and does not have a large or long rear or side garden stretching away from the rest of the settlement. It has a generous side garden that runs towards and up to an adjacent dwelling which is within the proposed redrawn SPB and the established curtilage is distinct from the agricultural landscape beyond. What is proposed is precisely that which the methodology paper says is to be avoided - "*petty*

*deviations from physical boundary features*". Moreover the whole of the land at Windyridge is orientated towards the village not the countryside beyond and an additional single dwelling at the side would have no adverse consequences for the transition of the village into the agricultural landscape beyond.

10. The redrawing of settlement boundaries should have been accompanied by a risk assessment of what the reduced areas might mean for future windfall development because taking away such potential across the settlements of the NP and then relying on a high level of windfall homes being produced is unsound and has no robust basis. Indeed it casts doubt on whether the reliance on a substantial contribution to housing supply from windfall development has been properly thought through.
11. The rationale for settlement policy boundaries should be to include the built form of the settlement and exclude open land that measurably adds to the landscape surrounds of the settlement. Windridge clearly meets the former and does not fall within the latter. Moreover the SPB is over 30 years old and during which the site has rightly been considered to be within the envelope of the village and not in open or the wider rural landscape.
12. There is also a grave inconsistency in the planning policy approach of the SDNP LP that under policy SD30 will allow one dwelling in the countryside to be replaced by two or more new dwellings provided the overall increase in floor area is not greater than 30% of that existing but where the SPB is seemingly being withdrawn to limit development opportunities. If two or more dwellings can be built at Windridge under policy SD30 then why redraw the SPB?
13. Reducing the extent of SPBs will curtail the potential development of individual homes in sustainable settlement locations where there will be far less landscape impact. If additional homes in the countryside are acceptable in the circumstances of policy SD30 then there is no reason why additional homes at settlements should be prevented by tightly drawn settlement policy boundaries.
14. The redrawing and reducing the SPB for Buriton should be reconsidered and the boundary returned to that which has existed for 30 years so that all land that does not contribute to the wider landscape and arguably and meaningfully contributes to the settlement pattern is left inside. In that respect Windyridge, Bones Lane should be included within the SPB.
15. The tighter drawing of SPBs flies in the face of the named settlements being identified as settlements that are truly well placed to accommodate some level of growth. The proposed settlement policy boundaries for settlements have in a number of instances, including that

for Buriton, been too narrowly defined. That has an impact on the level of windfall development that the SDNPA is heavily reliant on to meet its make up part of its reduced housing requirement numbers.

16. The Pre-submission Plan should be withdrawn and the settlement strategy meaningfully and robustly reviewed. Consideration should also be given to the advice in paragraph 55 of the NPPF to look at the role larger settlements play in supporting smaller communities and focusing on development opportunities to the mutual benefit of a group of settlements.
17. Without a sound approach to development strategy it cannot be said that the SDNPA has met its duty to seek to foster the social and economic wellbeing of the local communities within the National Park.

**Contact Details**

Title: Ian Ellis BA MRTPI

Organisation: Southern Planning Practice

Address: Youngs Yard

Churchfields

Twyford

Winchester

Hampshire

SO21 1NN

Email: [ian@southernplanning.co.uk](mailto:ian@southernplanning.co.uk)

Tel: 01962 715770