

Comments on document PS/05/MF15 (Neighbourhood Planning)

The proposed changes to policy SS5 are unsound for the following reasons.

Replacing “approximately” by “at least”

The change is not “justified”. The reason given is to “promote flexibility and ensure that the figures are not considered as a ceiling for development levels by Neighbourhood Planning Groups”. There is no evidence that there is any real risk of NPGs treating the numbers specified in the policy as a ceiling. Indeed, the Oakley NPG held a public consultation in April 2014 in which they asked the question “How many extra houses should the parish have?” and gave residents a range of possible answers which went from 150 (as in SS5) to 350.

The emerging Oakley Neighbourhood Plan allocates 150 dwellings over five sites. In each case, the site is allocated “approximately” a number of dwellings and the numbers allocated total 150. The word “approximately” was used to comply with the LPA’s response to the Pre-Submission draft of the plan and to allow for the possibility that developers would be able to develop more houses than anticipated on the land allocated.

Of course, “approximately” also allows for the possibility that developers might bring forward slightly less than the number allocated. It is not at all clear how this would fit with the use of “at least” in policy SS5. The revised SS5 might not be “effective” – given that the Oakley NP is with the examiner and the other NPs are at an advanced stage. The new wording might well fail the requirement in NPPF 154 that policies should provide a clear indication of how a decision maker should react to a development proposal.

Making the proposed change at this late stage in the development of the relevant Neighbourhood Plans – and without any evidence that the change is needed – would be contrary to the support for Neighbourhood Planning which is in the NPPF and would undermine the support already given by the LPA to the NPGs – contrary to the opening words of SS5.

Setting a minimum of 10 homes for all villages with a SPB

Setting the same minimum for all villages – irrespective of size – cannot be “justified” as there is no evidence to support it. There has been no identification of the “objectively assessed development” needs of the relevant villages.

Villages with SPBs – other than the settlements listed in SS5 – range from:

- small villages like Dummer, Burghclere, Preston Candover and Upton Grey with about 200 dwellings, through
- medium sized villages like Sherfield on Loddon and Sherborne St John with 500 or 600 dwellings, to
- Old Basing with over 1,600 dwellings

If there is to be a minimum for villages not listed in SS5 it needs to be based on evidence and reflect the size of the village.

It cannot be “justified” to just impose a 5% increase in size on the smallest villages.