

Part A: Personal Details

*If an agent is appointed, please complete only the Name and Organisation boxes for the client in 'Your Details', but complete the full contact details of the agent.

	Your Details	Agent's Details* (if applicable)
Name (including title):	STEVE LUMB	/
Organisation (where relevant):	/	
Address:		
Post Code:		
Telephone number:		
Email address:		

NOTE:

Representations will only be accepted that refer to a proposed change shown in the *Schedule of Proposed Main Modifications to the Pre-Submission Draft Local Plan (2017)*, the map changes or to the Habitats Regulations Assessment Report, incorporating Main Modifications (2017) or Sustainability Appraisal Report, incorporating Main Modifications (2017).

Your responses on the above documents will be sent to the Planning Inspector without prejudice to the Inspectors final report.

You should not repeat or re-submit your previous representations, these have already been considered by the Inspector during the examination process.

PART B: Your representations

Please use a separate form for each representation.

B1. To which proposed Main Modification does your representation relate?

Please state the relevant reference number that you are commenting on from the Schedule of Proposed Main Modifications (e.g. MM01):

MM 532-SP4

Description of the proposed Main Modification (e.g. Page 60, Section 8)

PAGE 19 OF SCHEDULE HOUSING IN INLAND MEDIUM AND SMALL VILLAGES.

Please complete a separate form for each representation.

B2. Do you consider this proposed Main Modification is:

Legally compliant?
Please select one answer

Yes

No

Sound?
Please select one answer

Yes

No

B3: If you consider the proposed Main Modification to be unsound, please identify which test of soundness your representation relates to?
'Sound' means: is the Main Modification justified, effective, positively prepared and consistent with national policy?

Positively prepared?
Please select one answer

Yes

No

Justified?
Please select one answer

Yes

No

Effective?
Please select one answer

Yes

No

Consistent with national policy?
Please select one answer

Yes

No

Your representation should succinctly cover all the information, evidence and supporting information necessary to support/justify your representation and any suggested changes.

B4. Please give details of why you consider the Local Plan is not legally compliant or is unsound?

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representations.

There is sometimes reason to support the development of a site/eyesore in a small otherwise unsustainable location/village, if the proven benefits outweigh the wider/regional/district/local consequences. But unless these benefits are evidence based, are tangible and are supported locally (eg by the Parish Council), it is impossible to see the positives, benefits or justifications for the proposed modification in the smaller settlements. Thus the modification is not sound. The wording is also imprecise and open to wide interpretation and abuse.

The modification, would simply open the door for speculative, mostly small scale landowners, to maximise land value, resulting in new housing in those locations without infrastructure and providing property for an ageing population, wishing to move into small villages. It is an unnecessary policy and it is a policy worded in a way which is woolly, lacking criteria and would be a Development Management nightmare in terms of practical interpretation and definition.

I consider the modification:

Not to be positively prepared – it does not meet any strategy need, is not based on any assessed development need or unmet requirement and it does not achieve sustainable development. Its wording is unclear and open to the widest of interpretations. Further – the modification proposes ‘no more than 2 dwellings’. How is that number arrived at – justification/evidence? Is it no more than ‘2 dwellings’ per application, or per frontage, or per site, or per year? Once an application for two dwellings is permitted, how is a further application for another two houses adjacent say, considered if submitted a year later? There is nothing in the modification to assess this and there are no criteria. There is no strategy. The modification is not sound.

Not to be justified – there is no evidence that additional houses on gap and infill sites in small villages achieve any unmet housing need, other than to serve landowners and those moving into the area – mostly retirees. If this were specifically intended to providing housing to retain young people or to meet affordable needs the modification may have justification and if the evidence supported that.

Not effective – the modification as worded is difficult to deliver effectively due to the subjective nature of the terminology and by its very ‘wooliness’. It would be a Development Managers nightmare to deliver. What is “appropriate” – the definition as detailed remains woolly and unclear – what does, “not conflict, when taken as a whole with national policy or policies of the local plan” (*what*

Please be as precise as possible.

CONT.

B4. Please give details of why you consider the Local Plan is not legally compliant or is unsound?

If you wish to support the legal compliance or soundness of the Local Plan, please also use this box to set out your representations.

CONTINUED

'whole? – the national/local policy' and which of those?). This wording will not mean a lot to most people and gives no clarity or certainty. It can be interpreted widely and differently, depending if one is developer/landowner, community, or planning officer. This leaves far too much room for uncertainty and when there is no clear objective or evidence to justify speculative housing. When is "garden ground" not garden ground? In my own village of "Old Bolingbroke" a house was sold separately from its large side garden area many years ago. That garden has now since become an attractive meadow.

So is it a garden still or is it a meadow? And if a meadow, it could be classed as 'infill' or 'frontage development' and the 'site' might be considered as an "appropriate location". Too many judgements to be made here and with no criteria.

As already set out above - the modification proposes 'no more than 2 dwellings'. How is that number arrived at – justification/evidence? Is it no more than '2 dwellings' per application, or per frontage, or per site, or per year? Once an application for two dwellings is permitted, how is a further application for another two houses adjacent say, considered if submitted a year later? There is nothing in the modification to assess this and there are no criteria. There is no strategy. The modification is not sound.

These small villages – e.g. Old Bolingbroke - have no facilities, mostly no transport links other than car and they have open spaces and character which is usually very much valued, is intrinsic and respected locally. Yet these spaces would come under intense pressure from this modification, with loud landowner voices and the tendency would be for permissions to be forthcoming. Cumulatively, 2 dwellings on 2 dwellings on 2 dwellings would lead to a creeping form of over-development and lead to further unattainability and a draw from the housing required in those places with infrastructure. Some 'small village' locations, might be able to accept development, where they were considered by the community to positively enhance and support the settlement. But in such cases that lead and input should come primarily from the community itself. In such cases applications could, in development management terms be considered as a justifiable departure from policy – those instances do not need a policy modification such as is proposed. It is not necessary.

Finally, national policies are not met with this modification as such small villages without infrastructure, transport links or facilities is an unsustainable location.

Please be as precise as possible.

B5. Please set out what changes you consider necessary to make the proposed Main Modification to the Local Plan legally compliant or sound. Having regard to the test you have identified at B3 above where this relates to soundness?

You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

If the policy was based on positively enhancing the character of a small village and when also supported by the local community, village plan or Parish Council then a policy along such lines could have some vigour. It would also be based on what is considered important locally and in an otherwise unsustainable location. Any reference to "2" without reference to distances, context will lead to problems with potentially cumulative planning applications.

A suggested policy wording to enable appropriate small-scale development which is appropriate could be:

"Small scale housing will be supported in the medium and small villages, when such development is located and designed in a way which positively enhances the character of that village area and village as a whole and which does not take away locally valued open spaces or established valued landscapes. Any such development should be supported by a locally adopted village plan or by the local Parish Council, in addition to the normal development considerations and national and local policies".

Please be as precise as possible.

B6. Do you have any comments on the updated Addendum to the Sustainability Appraisal or Addendum to the Habitats Regulations Assessment in respect of this particular modification?

NO

Please be as precise as possible.

PART C: Notification request

You can request to be notified at an address or email address of any future stages relating to the Local Plan.

C1. Would you like to be notified of future stages?

Yes No

C2. How would you like to be notified?

By post to my address:

By post to my agent's address:

By email to my email address:

By email to my agent's address:

Please select one answer.

C3. Which stages would you like to be notified about:

The publication of the recommendations of Planning Inspector?

The adoption of the Local Plan?

Data Protection Act 1988 and Freedom of Information Act 2000

Representations cannot be treated in confidence. Please see the attached privacy notice. The Town and Country Planning (Local Planning) (England) Regulations 2012, requires copies of all representations to be made publically available, this will be done via the Council's website. The Council will not publish personal information such as addresses, telephone numbers, or email addresses. By submitting a representation you confirm that you agree to this and accept responsibility for your representations.

Signature:

Steve Hunt

Date:

14/02/18

Please sign and date your representations.

