

TEST VALLEY BOROUGH COUNCIL LOCAL DEVELOPMENT FRAMEWORK

NOTES OF CORE STRATEGY EXAMINATION EXPLORATORY MEETING

Conference Room 1, Beech Hurst, Andover

11.00am on Friday 1 May 2009

Present:

Jill Kingaby	Inspector
Steve Lees	Head of Planning Policy and Transport, Test Valley Borough Council
Graham Smith	Planning Policy Manager, Test Valley Borough Council
Marie O'Sullivan	Government Office for the South East (GOSE)

In attendance:

Liz Slade	Programme Officer
Observers	(See Appendix One)

1 Introductions

- 1.1 The Inspector opened the Exploratory Meeting concerning the Test Valley Core Strategy (CS) Development Plan document (DPD), (Pre-submission draft 2008 with Schedule of Amendments March 2009) which forms part of the Council's Local Development Framework (LDF).
- 1.2 The Inspector introduced herself; Mrs Slade, the Programme Officer; the Council's representatives, Messrs Lees and Smith as well as the representative from GOSE, Ms O'Sullivan.

2 Purpose of Meeting

- 2.1 The Inspector explained the purpose of the meeting as follows:
- 2.2 'The "Examination" of a DPD is the whole process from the time when a Council submits a DPD to the Secretary of State until the Inspector issues his/her binding report on the Council. Thus, this Examination actually started at the end of March, when the Council formally submitted the Test Valley CS DPD to the Secretary of State.
- 2.3 The starting point for the Examination is that the Council has submitted what it considers to be a sound DPD, having regard to the Planning and Compulsory Purchase Act 2004 and the Government's Planning Policy Statement 12: Local Spatial Planning (PPS12, 2008). At the independent examination the Inspector has to be satisfied that the DPD meets the legal requirements under the 2004 Act

and is sound. If the Inspector is so satisfied, then the DPD can proceed to adoption. However, there are other possible outcomes of the Examination. The most serious would be a finding of unsoundness in relation to a critically important part of the CS leading to a recommendation that it should be withdrawn.

2.4 Less serious outcomes may be that:

- Additional work needs to be undertaken before the Examination can be completed;
- Part of the CS should be excluded or changed and the remainder adopted (having regard to the implications in terms of community involvement and sustainability appraisal requirements); and the scope for leaving matters for a subsequent DPD.

2.5 You will be aware that I may only make a change to the submitted CS if that change is itself sound, i.e. accords with the requirements for community involvement and sustainability appraisal, national and regional policy, and would be justified and effective. Thus the extent of changes that I can make, if necessary to make the DPD sound, is limited.

2.6 From my initial examination of the CS, it appears to me that the document is unsound. The purpose of this meeting is to highlight my concerns to the Council at an early stage in order that it can consider the best way forward. I wish to hear its views as to whether additional work might be undertaken in response to these concerns, having regard to the implications for further Public Consultation and Sustainability Appraisal, and without causing undue delay to the LDF programme to achieve an adopted CS for the area.

2.7 You should appreciate that the matters I shall raise at this meeting do not cover all of those raised by representors, nor indeed all of the matters that I would wish to probe in detail in the examination. I consider those other matters would be adequately dealt with at any future Hearings sessions or through Written Representations.

2.8 In terms of the structure of this meeting, I shall explain each of my concerns, as set out in my earlier note. I shall give the Council and others the opportunity to ask questions of clarification and/or to respond as it wishes towards the end of the meeting after I have outlined my concerns. I am keen to hear from the Government Office for the South East, as they have raised a number of concerns not dissimilar to those that I have highlighted. They have been overseeing other LDF work within Hampshire and have been involved at early stages of preparation of this DPD. May I know who represents the Government Office today?'

2.9 Marie O'Sullivan from the Government Office for the South East introduced herself.

2.10 'It is not my intention to discuss detailed procedural or programming matters, or detailed aspects of the policies and proposals of the DPD today.

2.11 A note of this meeting, together with the Council's response will be produced and published on the Council's LDF website. A copy will also be kept in the Examination Library.'

3 The Core Strategy

3.1 The Inspector read her prepared statement which had been circulated earlier. This explained her earlier concerns that the CS (including the Schedule of Amendments) might not be found sound.

3.2 The Inspector asked the Council how it intends to consider her concerns.

3.3 Steve Lees thanked the Inspector for her comments and responded as follows:

3.4 The criticisms were fair but it was important to understand where the Council are:

3.5 The new Act came in in 2004 as the Council was holding its Public Local Inquiry which took place from September 2004 – March 2005. The Council made a conscious decision to focus on finishing its old style document because land had to be identified for housing, principally the Andover Major Development Area (MDA). Indeed, building work at East Anton has now started.

3.6 With little government guidance on the new system, the Council began work on its LDF in earnest, in 2006 having put in place the Local Development Scheme (LDS) and Statement of Community Involvement (SCI).

3.7 The Government had high expectations of the new system and what local planning authorities (LPAs) could deliver. It was a challenge to plot a course which the Council considered met the competing aims of government guidance, the strategic requirement for development emerging from the review of the Regional Spatial Strategy (RSS) and local aspirations and involvement of the community.

3.8 Lessons had been learnt on all sides that the system needed some serious adjustment. The new PPS12 came out just as the CS Pre-Submission Document was finalised. The Council asked the Inspector to take account of where it was at the time the document was drafted and not where we are today.

3.9 Speedy review of policy documents has been a consistent message from the Government. LPAs were told not to hold up process of preparing DPDs waiting for clear steer from RSS (PPS12 paras 4.53 – 4.58), a view shared by Inspectors in CS reports elsewhere.

3.10 In March 2007, the Council reviewed the LDS not knowing what development changes could arise from the SE Plan and deferred the submission version of the CS to September 2008. GOSE approved the revised timetable. The message from the Government was clear regarding the delivery of development and importance of having a healthy housing land supply.

- 3.11 Having moved it once, the Council were keen not to let that target slip, especially with the added issue of limited housing land supply in Southern Test Valley and the pressure to review the village boundaries. The Council has sought to take a reasonable course which delivers development, with room for manoeuvre at a later date i.e. in the Area Action Plans.
- 3.12 PPS1 came out in February 2005 and PPS3 (Treatment of Windfalls in Housing Land Supply) in November 2006. PPS1 Climate change Supplement was published in December 2007. In August 2007 the publication of the Panel report on SE Plan had an additional 600 houses at Andover which came out of the blue. In July 2008, PPS12 was revised and in the same month, Proposed Changes to the SE Plan published a total increase of 1,100 homes.
- 3.13 The SE Plan was due to be published in the spring of 2008, but this had not taken place at the time of the Exploratory Meeting. This presented difficulties; should the Council assume 600 houses needed to be found or should it wait for the SE Plan? The delay was very frustrating.
- 3.14 GOSE and TVBC take different approaches to the CS. GOSE have taken a microscopic view and scrutinised it in detail at various stages to see how it measures up to all the PPSs. The Council has taken a magnifying glass to national guidance, best practice and experience of others LPAs and sought to see how best it all fits in with local circumstances whilst keeping an eye on the bigger picture. There will always be tension due to the different approaches. The Council's main focus has always been to get the CS out.
- 3.15 It is important to reflect on where the Council has come from in 2½ years. The Issues and Options Paper was published in November 2006 along with the Scoping Report for the Strategic Environmental Assessment (SEA)/Sustainability Appraisal (SA). The LDF Bulletin reviewing options and SA was published in June 2006, the Preferred Options in January 2008 and the Pre-Submission in October 2008. From the documentation submitted it is apparent that there is an extensive evidence base and consultation with the community has been extensive and continuous.
- 3.16 There were only 670 responses to a document which contains proposals for a considerable amount of development, 8,910 homes. Some of those comments were in support of the CS which shows, given all that has taken place since 2006 the Council has met those key government aims, although others may have a different view.
- 3.17 The Inspector then asked the Council to address the nine points in her note.

Sufficiently Spatial

- 3.18 Steve Lees explained there are three documents to help LPAs with the term 'spatial', PPS1 and the two versions of PPS12, as the CS was well on the way to being finalised when revised PPS12 was published. It had used the Community Strategy to provide the headings. Like other LPAs, developing 'spatial plans' which

continue to perform the key task of influencing the development and use of land has been challenging. The Council accepts the CS could have been stronger in articulating all the work that has been undertaken and is proposed.

- 3.19 Graham Smith then explained that the Council sought to strike a balance between the expectation of GOSE and advice in PPS12. It considers, in terms of the relevant paragraphs in PPS1 and both old and current version of PPS12, that the CS is a 'spatial' plan. If required, the Council can turn to each specific paragraph but do not propose to do so. The Schedule of Amendments included a paragraph of locally specific objectives and improved signposting. Topic Paper 36b shows link between the Council and the Local Strategic Partnership (LSP).
- 3.20 Steve Lees then explained the difficulty with agencies e.g. the Fullerton issue. Water companies have five-year business plans and the CS is looking to 2026. His understanding is OFWAT regard a planning permission as a commitment, not the allocation in a DPD. The Council looked to see what was being done by other LPAs and although a number of Inspectors had criticised them for not doing more, they did not conclude it was a reason to make the DPD unsound.
- 3.21 Another example is with regard to skills and learning; Andover College were going to have a £30m refit when the Council wrote the DPD. However, this has now been delayed and that's why these two issues were not put in the CS. Unless Government funds essential services at the right time, the Council cannot put it in the CS. The Primary Care Trusts are another example; they cannot tell the LPA whether they want on-site or off-site facilities. That is why it was decided to make the strategic allocation to inform the decisions of providers.
- 3.22 The Best Practice that we looked at, did not appear fundamentally different from what we had outlined in the monitoring tables. CLG Paper 2008 "Infrastructure Delivery Spatial Plans in Practice" recognised the gap between expectations and current practice, that LPAs have a ringmaster role to play but that it would take a lot of time to achieve. The advice was "don't lose sight of good town planning". Test Valley has a good history of delivering large sites e.g. Chandler's Ford and Andover in the 1990s.
- 3.23 To realise the government's expectations would have resulted in delay and a bigger document to explain how all the other key strategies etc fitted together, with a severe risk of it becoming out-dated very quickly. The Council elected to go for the approach of putting in place the key land use elements and work through LSP to deliver, aiming for a separate living document on delivery.

Vision

- 3.24 Steve Lees explained the link between strategic objectives and key issues and why the Council has difficulty in including the Andover Vision within the document. Documents can be confusing for others as those working on it know how it works and fits together. However, Chapters 2, 3 and 4 of the CS are clear and the vision sits with objectives and issues. Monitoring tables include core objectives, SA/SEA objectives, indicators and delivery body which, in the Council's view, cover

everything. The reason why these are applicable, not just to Test Valley, is because they are based on SE Plan objectives, which in terms of developing the SA/SEA is what is advised as a good practice approach as commended by leading consultant Riki Therivel. The Vision is based on the one agreed by the Local Strategic Partnership in the Community Plan which covers the whole Borough, not just Andover.

- 3.25 The Inspector referred to her recent experience examining the Longbridge Area Action Plan (AAP), acknowledging that this was not a CS and was in a different part of the country. However, in her view this was a plan which was suitably forward looking, was spatial and intent on 'delivery'. Two LPAs were promoting regeneration jointly with developers and land owners; the plan included a re-located college part funded by the Learning Skills Council. She agreed there is a lot of uncertainty and it is often difficult to look too far ahead but the Longbridge AAP had sought to tackle these issues. Test Valley CS says hardly anything about funding and partnerships. Even though it is not a CS and plans are rarely directly comparable, it may be worth looking at the Longbridge AAP to see how they have framed their policies.
- 3.26 Graham Smith re-iterated the CS and the Community Plan do tie in together. Section A provides the context to the strategy; Section B, the spatial provision for the Borough, the core development policies for the whole Borough and the strategies for Andover, Southern Test Valley and the rural area and Section C, the development control policies. Each Chapter contains local reasons for the policy's inclusion.
- 3.27 Graham Smith also explained that, following advice from GOSE, the Council had put further signposts under the CS objective and thus satisfied PPS12.

Delivery Strategy

- 3.28 Steve Lees explained the delivery of the proposals of the CS has been central to its preparation (see chapters on Andover and Southern Test Valley) and a major factor in setting an ambitious timetable for submission. How much development, where and when are strong although the Council accepts that 'by what means?' could be stronger. Sites for 3,700 houses have been identified and have planning permission at Andover. The Council anticipated the changes made by PPS12 in order to have early, positive discussions with key infrastructure providers. Good examples of the Council being pro-active is the recently built ASDA store in Andover and the Taylor Wimpey development at East Anton, Andover where, as previously mentioned, building has now started. It is difficult for the Council to give clear commitments as most of the infrastructure would be funded by the private sector, out of which the development would flow. This is why the AAPs will be the forum for further detail.
- 3.29 The Council, by being clear as to where development could take place, was able to satisfy itself that there were no major infrastructure issues, with the important exception of Fullerton. The Council did not want to fall into the trap of attempting to

have a comprehensive view on role of other agencies and it would not have been possible to keep to the LDS timetable.

- 3.30 What the Council has achieved is significant progress via the LSP. The management board is committed to supporting the delivery of the CS. One example is the setting up of a Community Development Action Group with specific action groups for the major new neighbourhoods proposed at East Anton and Picket Twenty in Andover and Abbotswood in Romsey. If successful the Council will want to repeat it for other sites.
- 3.31 The Council was not in a position, given timescales of various infrastructure providers working and issues around funding, to, with certainty, set out in CS when investment will take place over the next 17 years. Government spending reviews are only looking three years ahead.
- 3.32 The Council is concerned about the Inspector's comments regarding paragraphs 7.8 and 7.9. The Council, with regard to Andover, has taken a pragmatic view with regard to additional housing at Andover. In the absence of clear advice from the Environment Agency (EA) on its impact on the River Test SSSI, it would not be doing its job as local planning authority to propose more housing. The Council has not said no to any more housing. There is currently around 13 years housing land supply so there is time to resolve the issue.

Clear Spatial Choices

- 3.33 Steve Lees then explained to the meeting why the Council considered that the CS meets advice in PPS12 paragraph 5.2(4). It has set out clearly where the Council considers development should take place i.e. Andover, Romsey, North Baddesley and Nursling and Rownhams. The Council were the first to allocate broad locations and strategic sites in Hampshire. If there is a case for more development, the CS, having set the strategic context, enables the AAPs to consider additional sites. This is an approach consistent with the emerging RSS guidance because Andover is identified by the Secretary of State as the most sustainable and, therefore, best place for additional development.
- 3.34 The CS is also clear, notwithstanding a debate on merits of gaps/settlement character, on where development would be inappropriate.
- 3.35 With regard to the rural villages, the CS is, again, very clear about where development is appropriate by proposing a settlement hierarchy consistent with the objective of sustainable development. It would provide a basis for a debate via the AAP of the scale of development, if any, in villages against a background of no strategic requirement.
- 3.36 Graham Smith explained the Council had tried to be more pro-active and this was highlighted in the Schedule of Amendments. The Spatial and Settlement Hierarchy included spatial allocations. Other changes follow local distinctiveness and outstanding issues of the SE Plan.

Area Action Plans

- 3.37 Steve Lees sought to assure the Inspector that the Council were not ducking difficult decisions. It had sought to meet the emerging requirement of the SE Plan in the CS but, as mentioned earlier, the timing of key decisions for the Council and the stage reached by the SE Plan were important factors.
- 3.38 The Andover AAP is where a decision is to be made about additional development if the SE Plan increase were confirmed. It is worth remembering that the Panel said an extra 600 homes but the Secretary of State is saying 1,100 which is the figure the Council would have planned for in the AAP. In any event, the Council had an outstanding objection to Proposed Changes to the SE Plan.
- 3.39 For reasons above, the AAP is the place to make decisions given the issue of impact of a further increase in housing numbers has not been resolved. The EA has not formally advised the Council that the impact of the extra houses on the River Test SSSI is acceptable. In terms of the SA and Habitat Regulations (HA), it puts the Council in a difficult position if included within CS with no clear understanding of its impact.
- 3.40 In Romsey, the sports provision at Ganger Farm and new supermarket can also wait for the AAP as a decision needs to be made on scale and location of convenience retail floorspace. The retail study was not, in the Council's view, sufficiently robust to promote an allocation. Uncertainty over the scale of development for Romsey is not established and on retail forecasts for the later stages of the CS, consultants advised caution. Quite properly, the Council has decided to defer to AAP when there would be more certainty. To include more details on retail floorspace in Romsey or mix of uses in Andover town centre without robust evidence base would be contrary to government advice.
- 3.41 The Inspector appreciated that there are difficult decisions to be made but the CS should be looking forward 17 years. It is a large amount of housing but the CS should indicate where it is to be channelled. For example, bearing in mind what has been written in Chapter 14, could the additional 1,100 homes be accommodated around the centre of Andover? The CS should be bold. From the plan it is not clear how now much employment land is to be allocated and where. She could not see basic principles as to the direction and quantum of development over the longer plan period coming through in the CS.
- 3.42 Steve Lees said in Romsey the amount of convenience floor space is not stated as the forecast in the evidence base was not clear. Comparison goods figures, however, are given. In Chapter 15 of the CS it is clear how much and where development is going. There is also employment floor space provision at Whitenap and Nursling. Employment projections are speculative. The Council is committed to expansion of Walworth and Portway Industrial Estates in Andover. The AAP will provide further detail.

- 3.43 The Inspector agreed that in recent months and years it has not been easy to predict, but the CS should look at long-term planning and make adjustments along the way.
- 3.44 Steve Lees advised that the revised LDS in 2009 sets out the Council's approach and has been agreed with GOSE. It clearly sets out an approach which allows for further details to come forward.
- 3.45 With regard to water issues, the AAP is the best place to make decisions given the issue of the impact of a further increase in housing numbers has not been resolved. The EA has not formally advised the Council that the impact of the extra houses on the River Test SSSI is acceptable. In terms of the SA and HA, it puts the Council in a difficult position if included within the CS with no clear understanding of its impact.

Distinctiveness/Length of Document/Old Style Local Plan

- 3.46 Steve Lees advised that with regard to the length of the document, it is very difficult to produce a 30-50 page document with the advice now contained within the PPSs. A Word document could reduce the Council's CS by 60 pages. The earlier PPS12 para 2.12 supported the inclusion of policies which supported the delivery of the CS but was not continued in revised PPS12 which say national guidance should not be repeated. It is also worth mentioning that when tracking other Inspectors Reports, whilst they have not been entirely happy about repeating national policies in isolation, they have found that it did not make a plan unsound.
- 3.47 When one turns to national guidance, the PPSs and PPGs are very clear in advising LPAs that their local development documents (LDDs) should contain policies on a range of topics. A review of the relevant advice for the Borough suggests that potentially some 80 policies would be required to satisfy the PPSs.
- 3.48 The Inspector referred to the Mid Devon CS which had been found sound and had achieved conciseness i.e. a document about 50 pages in length. Whilst no two places are ever the same, the area was predominantly rural and in that respect not dissimilar to Test Valley.
- 3.49 Regarding the Inspector's concern that there is an old-style approach to the CS, Steve Lees said the current adopted local plan was already starting to go down the spatial route when published. The old style works for the geography of the Borough – Andover, Rural centre and Southern Test Valley is how the residents see it.
- 3.50 From a development control point of view, decisions need to be made in accordance with the DPD. The Council has struggled to devise a CS which satisfies the competing advice. The Council has sought to keep to a minimum number of policies and distinguished those it consider are core to the delivery of the strategy.

- 3.51 At the Preferred Options Stage, the Council was widely criticised but had made a conscious decision to write the CS in the old style as the public wanted to see a more traditional style document where they could readily see what was happening in their area. The Council has, however, tracked other Inspector's reports and if it were starting again today, would present it differently.
- 3.52 In terms of local distinctiveness, the Council has taken the view that whilst the Borough does have some issues which are different to other districts in Hampshire e.g. self containment of Andover, Southern Test Valley has a different settlement pattern to other south Hampshire districts although, in many respects, faces the same issues as any district across southern England within commuting distance of London.
- 3.53 It is difficult, as other LPAs have found, to produce a CS in as concise a form, as government would like. It is interesting to note that, in a meeting with GOSE and the Planning Inspectorate, a number of requests were made to add material to the CS. The document is a product of the feedback from previous local plan Inspectors who supported the geographic division of policies as per chapters 14, 15 and 16.

PPS3

- 3.54 Steve Lees explained the Council's view regarding the SE Plan was to accept the proposed figure in draft on the basis of capacity at Andover and advice from EA on the capacity of the Fullerton Waste Water Treatment Works. At the time of the SE Plan preparation in 2006, the regional planning committee received a paper which said capacity was in the order of 4,500 additional homes, effectively what was committed already in Andover.
- 3.55 The Council had no evidence or advice in preparing the CS that Andover could take more housing. The position was put to the EiP and repeated in commenting on changes to the SE Plan. Without the confidence of advice on Fullerton, any appraisal of options would be fundamentally undermined on SSSI/Habitats Regulations issues. As said earlier, the Council has yet to be advised by the EA what the capacity of Fullerton is, although we are aware the EA is testing figures higher than 4,500.

SHLAA

- 3.56 Steve Lees explained that in 2006, post PPS3, the Council took the view that it would not include windfall sites in housing land supply, that the strategic housing requirement would be met principally by strategic sites.
- 3.57 SHLAA was produced in 2008 as means to inform future decisions on provision of housing land. The Council consulted the development industry and as many landowners and developers as reasonable in terms of who it understood to have an aspiration to see their land come forward. It is currently being updated.

- 3.58 The Council's strategy was that the CS would identify greenfield sites to meet the submitted SE Plan and AAPs, informed by the SHLAA, would shape future allocations potentially needed later in the plan period or in review of the SE Plan.
- 3.59 The low figure of 25% PDL is a reflection of the scale of strategic requirement which is a reflection of its greenfield site potential taking account of the constraints. It would be perverse, therefore, for the Council to seek to achieve 60%, which is the national target, within a Borough where two main towns have a population of 40,000 and 17,000 and 95% is classified as rural.
- 3.60 All rural villages have been assessed via SHLAA. There is no strategic requirement to allocate development as CS identifies Andover as the most sustainable location. Any development would only be justified on the basis of sustaining rural communities. To allocate development in the villages instead of Andover would be in conflict with the SE Plan where Secretary of State is clear that Andover is where the housing should go.
- 3.61 The Inspector asked GOSE to respond.
- 3.62 Marie O'Sullivan clarified the situation regarding publication of the SE Plan. She indicated that she could not comment on the SE Plan due to the stage that it had reached in the process. At the time of the exploratory meeting, Marie O'Sullivan indicated that the document was due to be published shortly.
- 3.63 Regarding the length of the document, Marie O'Sullivan stated GOSE had looked at the document as a whole in making its comments. The Council had taken forward the points they had raised and that was welcomed.
- 3.64 With regard to the timing of difficulties with the new PPS12, Marie O'Sullivan stated that all LPAs were in the same position. The finalised version of PPS12 was produced in June 2008. A draft consultation document setting out revised guidance and indicating a change to PPS12 had been produced some time earlier, approximately six months before.
- 3.65 With regard to increased housing figures in the SE Plan, these were public three months before the Regulation 27 stage. PPS3 refers to taking account of the level of housing provision proposed in the relevant emerging RSS (paragraph 53 refers). PPS12 (paragraph 4.14) also states that the need for frequent updating of housing figures may be reduced by taking a long term view and providing some flexibility. The document would not therefore need to be updated simply because there had been a change in the housing numbers in the RSS.
- 3.66 Regarding the issue at Fullerton, Marie O'Sullivan referred to the Council's schedule of amendments, stating that the revised text did not reflect PPS12 paragraph 4.10 which provides advice on infrastructure provision and uncertainty over its provision:

"The need for infrastructure to support housing growth and the associated need for an infrastructure delivery planning process has been highlighted further in the

Government's recent Housing Green Paper. The outcome of the infrastructure planning process should inform the core strategy and should be part of a robust evidence base. It will greatly assist the overall planning process for all participants if the agencies responsible for infrastructure delivery and the local authority producing the core strategy were to align their planning processes. Local authorities should undertake timely, effective and conclusive discussion with key infrastructure providers when preparing a core strategy. Key infrastructure stakeholders are encouraged to engage in such discussions and to reflect the core strategy within their own future planning. However the Government recognises that the budgeting processes of different agencies may mean that less information may be available when the core strategy is being prepared than would be ideal. It is important therefore that the core strategy makes proper provision for such uncertainty and does not place undue reliance on critical elements of infrastructure whose funding is unknown. The test should be whether there is a reasonable prospect of provision. Contingency planning – showing how the objectives will be achieved under different scenarios – may be necessary in circumstances where provision is uncertain.”

- 3.67 Marie O'Sullivan referred to the Council's comments that development to be included in the Andover and Romsey AAPs were not strategic in nature and would be addressed in the respective AAPs. If the Council had not completed the work, how could they be certain that their proposals would not go to the heart of the document. The Inspector reiterated this point.
- 3.68 Regarding a Plan B for Andover, Steve Lees agreed that the Secretary of State said it is a sustainable location for development. It is very difficult to have a Plan B when guidance says housing has to go to Andover first and when the second biggest settlement is Wellow which is next to a National Park has a population of under 3,000.
- 3.69 Steve Lees advised that consultants had only identified a case for 4ha of employment land in addition to commitments and had not considered it to be an issue for the AAP.

Flexibility

- 3.70 Steve Lees explained that Council strategy has been to identify sustainable locations e.g. Andover, Romsey, North Baddesley and Nursling and Rownhams, then identify sites which can be delivered within the plan period. Contingency planning can be provided via the AAPs as a consequence of monitoring performance. In addition, the potential supply from windfalls would be in addition to the strategic allocations. The figure quoted in para 7.5 of 2,000 was included to gauge the scale of what might come forward.
- 3.71 The Inspector asked if the Council understood 'plan, monitor, manage'?
- 3.72 Steve Lees said the Council fully understood but PPG3 guidance had been replaced by PPS3. Test Valley wanted certainty so allocated greenfield first.

- 3.73 The Inspector drew attention to paragraph 40 of PPS3 which confirms that LPAs should continue to make effective use of land by re-using previously developed land. Whilst the formal sequential approach to site selection outlined in PPG3 has gone, re-use remains important. Indeed, the emerging SE Plan sets a target of at least 60% of development on previously developed land. She was unclear whether Test Valley's approach to site selection for new development or its 25% figure was consistent with this.
- 3.74 Steve Lees assured the Inspector that the Council had not forgotten about brownfield sites.

Consistent with Government Advice

- 3.75 The Council did not respond on detailed points given the Inspector's comment that she wanted to focus on the other issues.
- 3.76 The Inspector then asked the observers present if they had any questions.
- 3.77 Phil Bird, Town Planner asked what is and what isn't strategic as there seems to be little regard for the needs of villages and how do we make them more sustainable?
- 3.78 Barbara Clark from The British Horse Society asked if farming interests could be considered if development is to take place on adjoining land. She also asked at the end of the meeting if the British Horse Society, a non-statutory consultee, could be consulted early if bridleways were involved.
- 3.79 Peter Spurgeon asked if a solution could be found about showmen's sites.
- 3.80 The Inspector concluded these were not issues for the Exploratory Meeting but would be considered at another time in the examination. A short break took place at 1.10pm and the meeting reconvened at 1.48pm.

4 The Next Steps

- 4.1 The Inspector remained concerned about place shaping, delivery and looking at the longer term which do not go far enough. She considered that the DPD as it stands is unsound and was unconvinced that it could be made sound solely by amendments which could be put forward for discussion at early Hearing Sessions.
- 4.2 The Inspector had given some thought as to whether and how this CS could be rescued. In view of the considerable work that has been undertaken on forming the database, it seemed to her that every effort should be made to do so. She suggested the following:
- a) There has to be a change in thought processes; this is not another revision of the Local Plan. The main task is not to produce a hefty written document, it is to provide a delivery orientated, concise CS which provides the basis for collaborative working with other agencies and local people to achieve its vision and objectives on the ground.

- b) The vision, strategic objectives and key issues need to be re-drafted so that they are more dynamic and locally focussed.
- c) Part B should outline the strategy for the future: it could be written around the key issues, beginning with the most important, which seemed to her to be how to accommodate the growth which is expected by the SE Plan. It seems sensible to consider the 3 geographical areas of the Borough individually, but make sure that the “how much” question – for new homes, jobs and employment land, town centre floorspace etc in all areas including the rural area is spelt out. Of course, these numbers will need to be justified by the evidence base, and internally consistent.
- d) In Part B, make sure that the policies are forward looking and strategic, not repetitive of each other or national and regional policies, and not development control policies. Ensure that the where, when and by whom new development and supporting infrastructure will be delivered questions are addressed.
- e) Go back to the SHLAA and make sure that it has been carried out in accordance with Government guidance and has engaged all stakeholders and covered all relevant parts of the Borough. Look very carefully again at the proposals for new housing development having regard for the split between previously developed land and Greenfield sites. Look at the strategic allocations to ensure that they are the best available of alternatives, and are all justified. If they are not, make changes.
- f) Review Part C of the CS and reduce it substantially, bearing in mind the advice about development management rather than DC policies. It may be appropriate to change the title of the DPD.
- g) Ensure that the document is as succinct and readable as possible – remember the 30-50 page guide. A key diagram would be most helpful assisting the reader to see where major change is intended and areas are to be protected.
- h) If a way forward can be found, this should be timetabled so that it is clear when the Examination might resume and future PHM and Hearing sessions held.

4.3 In answer to a question by the Inspector, Marie O’Sullivan sought clarification that the Inspector was referring to withdrawal of the document, in view of the work recommended for completion before examination. The Inspector indicated that, if the Council required more than 6 months to re-write the CS, this was the case.

4.4 Steve Lees then answered the eight points as follows:

- a) The views expressed are those of the Head of Planning Policy and Transport who would need to consult the Portfolio Holder and Cabinet before a formal response would be made to address the Inspector’s concerns. Redrafting can be done but would be subject to concerns raised about degree of certainty to achieve on delivery involving infrastructure providers.

- b) The Council can review the concerns about the CS not being local enough. It has taken the lead from the Community Plan regarding its vision and it is difficult to see how it could be different to that vision. If objectives were changed, the Council would have to completely change the SA which is just over 500 pages in length. Up to now, the Council have been happy with it. Riki Therivel from Levett-Therivel Consultants acted as advisor to the Council and considered the approach to sustainability appraisal was compliant with the guidance.
- c) The Council could redraft and deliver a clearer picture but would be relying on the same evidence base. The SHLAA can be reviewed but the issue of sustainability of rural villages remains.
- d) Redrafting of policies can be undertaken but as said before, there remain concerns that the Council can't influence the delivery strategies to the extent the Inspector is seeking; certainty is unachievable.
- e) The SHLAA comments could be taken on board. If the Council did include the 1,100 houses, it would wait for the SE Plan to be published as it wouldn't want to be caught out again. The Council would also need to allocate greenfield sites causing more work needing to be done and further consultation. It would also need the EA and water services to advise that the houses could be serviced. A Plan B cannot be found as this would be in conflict and out of conformity with national guidance.
- f) The Council accepts that 'development management' would be a better phrase and there is scope to make changes but development control officers do need clear policies.
- g) The Council can have a go at reducing the size of the document as there are similarities to Mid Devon. However, previous Inspectors' reports have not found the length of the document a reason for unsoundness.
- h) Regarding the timetable, assuming the RSS comes out in the next few weeks and states 10,020 new homes for Test Valley, the Council will need service providers to advise they can be accommodated. We would be looking at a Council meeting in September 2009 at the absolute earliest. With some community support, we could submit a document in February/March 2010.

4.5 The Inspector asked Marie O'Sullivan for her views.

4.6 Marie O'Sullivan stated that GOSE doesn't want to see Inspectors finding any CS unsound. Unsound CSs are not helpful for the local community, businesses, etc and GOSE would continue to work with Test Valley to take forward their document, as had been the case to date.

4.7 Marie O'Sullivan stated that GOSE would advise that the Council look at points raised by them at Regulation 26 stage, during the preparation of the current document and at Regulation 27.

- 4.8 Phoebe Merrick asked for an explanation of these Regulations.
- 4.9 Marie O'Sullivan explained that Regulation 26 was the Preferred Options Stage and Regulation 27, the Pre-Submission Stage of the CS.
- 4.10 Steve Lees stated that if the Council is to meet RSS figure in the CS and not the AAPs, this is the reason for delay in the CS.
- 4.11 Marie O'Sullivan stated she was happy to work with the Council in order to expedite putting in place a revised LDS and reminded the Council of the need for "real time" information in order to keep the public informed of timescales.
- 4.12 The Inspector stated she would not be pursuing the hearings and would await the outcome of meetings between GOSE and the Council. It was important to deal with concerns at this early stage.
- 4.13 Neville Surtees was interested to hear from the EA, Southern Water or OFWAT if they were here today.
- 4.14 Wesley Jones from the EA was in attendance but was standing in for colleagues in an observational capacity only. He was sure his colleagues would be happy to meet with GOSE and the Council.
- 4.15 Steve Lees is aware the EA have undertaken further studies but the results are still uncertain. The Council have been promised a new report and are awaiting clearance regarding rivers etc.
- 4.16 The Inspector suggested the Council and EA should meet soon.
- 4.17 Simon Neate from Indigo Planning asked for an explanation between a delayed document and a withdrawal.
- 4.18 The Inspector explained that a delay of up to six months is allowed but after that the document should be withdrawn. Marie O'Sullivan clarified that under the 2008 Regulations, Test Valley had the option to withdraw the CS before submitting it for examination, but they had not done so. She indicated that at submission, the document should be the finished article but was aware that Mr Smith had tried to be helpful by preparing a schedule of amendments for the examination. Marie O'Sullivan offered to discuss the details of withdrawal procedures with the Council outside the exploratory meeting. It was agreed that, because of the timetable outlined by Mr Lees, the Inspector would expect the current CS document to be withdrawn. However, she would await confirmation of the way ahead, after Test Valley and GOSE had held a further meeting.
- 4.19 The Inspector thanked everyone for attending and the meeting closed at 14.20.

OBSERVERS' ATTENDANCE LIST

Name	Organisation	In Attendance
Alan High		Yes
Elinor Munday		Yes
Julia Lloyd		Yes
Kath Tilling		Yes
Mr Akerman		Yes
Mr AWJ Hyde		Yes
Mr Elderfield		Yes
Mr Spurgeon		Yes
Professor Bryn Bridges		Yes
Stuart Aiken		Yes
Tom Hanslip		Yes
Tony Farthing		No
Patricia Leggett	15th Romsey (North Baddesley) Scout Group	Yes
Vincent Leggett	15th Romsey (North Baddesley) Scout Group	Yes
Paul Robinson	Architect	Yes
Michael Harris	Baker Tilly Tax and Accounting Limited	Yes
Neville Surtees	Barton Willmore	Yes
Anthony Hawkins	Bell Cornwell Partnership	Yes
Shelley Clark	Brimble, Lea & Partners	No
Bryan Jezeph	Bryan Jezeph Consultancy	Yes
Chris Ward	Bryan Jezeph Consultancy	Yes
Jonathan Stoddart	CB Richard Ellis Ltd	No
Noel Erskine	Charlton Parish Council	Yes
Anna Chivers	Chivers Partnership Architects	Yes
John Tarvit	Client of Barton Willmore	No
Gareth Williams	Cluttons	Yes
Jon Allen	Commercial Estates Group	Yes
John Cooper	CPRE	Yes
Dique Li	DC Li (Builders) Ltd	No
Jo Li	DC Li (Builders) Ltd	Yes
Doug Cramond	DCP Limited	Yes
Kevin Ayrton	Dreweatt Neate	Yes
Alistair Speirs	East Hampshire District Council	Yes
Julia Norman	Eastleigh Borough Council	Yes
Wesley Jones	Environment Agency	Yes
Selina Crocombe	Fareham Borough Council	Yes
Steve Carrington	Foreman Homes Limited	Yes
David Keys	GL Hearn	Yes
Sophia Thorp	Gleesons	Yes
Natalie Starmer	Hallam Land Management	Yes
Ruth McKeown	Hallam Land Management	Yes

Dr Pauline Holmes	Hampshire & Isle of Wight Trust	Yes
Toby Ayling	Hampshire County Council Environment	Yes
Mark Biles	Hampshire County Council Estates	Yes
Hannah Baker	Hampshire County Council Transport	No
June Addison	Hampshire Police	No
Asher Ross	Indigo Planning	Yes
Nick Lee	Indigo Planning	Yes
Simon Neate	Indigo Planning	Yes
Jonathan Kamm	Jonathan Kamm Consultancy	Yes
John Powell	JPPMS	Yes
Graham Beck	Luken Beck Ltd	Yes
Debbie Allan	Marques	Yes
Cllr Nigel Anderdon	Nursling & Rownhams Parish Council	Yes
Lorraine Wheeler	Nursling & Rownhams Parish Council	Yes
Paul Grant	Paris Smith	Yes
Jim Tarzey	Pegasus Planning Group LLP	Yes
Sarah Hamilton-Foyn	Pegasus Planning Group LLP	Yes
Barry Permain	Perbury	Yes
Paul Bedford	Persimmon Homes	Yes
Phil Bird	Phil Bird Town Planner	Yes
Alan Sale	Planning Consultant	Yes
Chris Amery	Romsey & District Society	Apologies
Phoebe Merrick	Romsey 2020	Yes
Fiona Taylor	Romsey Friends of the Earth	Yes
Cllr Mark Cooper	Romsey Town, Borough and County Councillor	Yes
Tim Hoskinson	Savills	Yes
John Shone	Swinghold Ltd	Yes
Mr ?	Taylor Wimpey	Yes
Barbara Clarke	The British Horse Society	Yes
Daniel Wiseman	Turley Associates	Yes
Stuart Irvine	Turley Associates	No
Cllr Dowden	TVBC and HCC Councillor	Yes
Cllr Mrs Baverstock	TVBC Councillor	Yes
Cllr Hatley	TVBC Councillor	Yes
Cllr Mrs Hawke	TVBC Councillor	Yes
Cllr Mrs Lovell	TVBC Councillor	No
Cllr Stallard	TVBC Councillor	Yes
Sarah McCullough	West Berkshire Council	Yes
Trevor Moody	White Young Green	Yes
Ian Webb	Wilky Property Holdings	No
William Penny	William J Penny Architects	Yes

Yes = Attended

No = Asked to attend but did not sign Attendance List, therefore marked as absent

Apologies = Asked to attend but tendered apologies before the meeting