

Test Valley Borough Council Next Local Plan - Refined Issues and Options Consultation

COMMENTS FORM

Test Valley Borough Council has published for public participation its Refined Issues and Options document. This is the second stage of preparing the next Local Plan, which follows the Issues and Options consultation in 2018.

You can respond to our consultation by filling out the form below. Further information can be found on our website at: www.testvalley.gov.uk/nextlocalplan

The consultation period runs from Friday 3 July 2020 to 4.30pm on 28 August 2020. Please respond before the close of the consultation period.

Once the form has been completed, please send to

If you are unable to send via email, please send a postal copy to our address below.

Contacting us

We are happy to help. If you have any queries, please contact us at:
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Test Valley Borough Council
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Weyhill Road
Andover
SP10 3AJ

Tel: 01264 368000

Website: www.testvalley.gov.uk/nextlocalplan

Part A: Your Details

Please fill in all boxes marked with an *

Title*		First Name*	
Surname*			
Organisation* <i>(If responding on behalf of an organisation)</i>			

If you wish your comments to be acknowledged and to be kept informed of progress, please provide your email address below:

Email Address*	
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If you don't have an email address and wish your comments to be acknowledged and to be kept informed of progress, please provide your postal address.

Address*			
	Postcode		

If you are an agent please give the name/company/organisation you are representing:

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Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment. All representations and related documents will be held by the Council for a period of 6months after the next Local Plan is adopted.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are available on our website

<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

Part B: Your Comments

Please use the boxes below to state your comments and questions. Please make it clear which paragraph or question your comments relate to where possible.

Paragraph / Question Ref	Comments
2	<p>Answers to the set of questions posed by the consultation document are given the end of this response by CPRE, however we hope that you will take note of the wider points made below. The numbers below relate to the sections in the I&O document.</p> <p>As well as the social and economic turmoil caused by Covid 19, there is considerable uncertainty about the future form of local plans caused by the publication of the government's First Homes Initiative in February and their planning reforms announced this month. As it is unclear when, and in what state, these measures will eventually make it into planning law we have responded to this consultation only in the light of current planning guidance.</p> <p>TVBC is right to highlight the importance of climate change to future planning; climate change and resource shortages will enforce massive changes on our entire way of life over the next few decades (the horizon for the next local plan), and so sustainable energy (heat and power devices, insulation etc) and water saving/recycling devices need to be incorporated into all new housing stock as soon as practically possible, even ahead of the slow-to-change Building Regs. However it is also important to consider the natural capital of the borough (water, habitats, wildlife, air quality, undeveloped land) and consideration of this should underpin all thinking and implementation of planning policy.</p> <p>The objective of planning should be to achieve sustainable development and the above needs and aspirations should be met by the local plan incorporating a (Bruntland) declaration which defines development as sustainable if it meets the needs of the present without compromising the ability of future generations to meet their own needs, with equal weight on environment, economy and society. Such a declaration needs to be backed up by with goals that can be quantified such as water consumption (in Test Valley), proportion of waste recycled, length of housing waiting list, percentage of development on brownfield land, amount of car travel and percentage of non-car travel (this is not intended to be an exhaustive list).</p> <p>We concur that town centres are very important and that active planning steps are needed to maintain their vitality and viability.</p>

<p>5</p>	<p>Living in Test Valley (Housing and Communities)</p> <p>CPRE is of the view that Test Valley is near saturation for housing, apart from providing for its own locally-generated needs, if the essential character and natural capital of the borough are to be preserved. However we recognise that central government is highly likely to impose its own housing target on the borough. The task of TVBC should therefore be to try to match the provision with what is needed in terms of location, size and affordability. TVBC should definitely not be bidding for more housing than the government specifies.</p>
<p>5.11-5.16</p>	<p>Housing distribution</p> <p>We support moves to allocate some housing to one or two other larger settlements, rather than to just Andover and Romsey. TVBC should make the allocations and then leave it to the individual parishes to decide where it should go via their neighbourhood plans and village design statements. A settlement hierarchy will help identify which settlements can support/need more housing. As well as facilities and services in the settlements, in drawing up the hierarchy consideration should be given to the amount of in/out commuting to/from the settlements since one of the aims should be to minimise car travel. It should also be recognised that the Covid 19 crisis looks certain to result in more working from home, which could result in more opportunities for local facilities to thrive. See also our answers to Q4, Q5, Q6 and Q7.</p>
<p>5.25-5.29</p>	<p>Settlement boundaries</p> <p>These should be made more permeable for council-funded or community initiated affordable property construction, but not for private market housing. See also our answers to Q8 to Q12.</p>
<p>5.30-5.35</p>	<p>Housing Mix and Affordable Housing</p> <p>There seems little point in the SHMA attempting to determine the numbers of dwellings required if government is going to impose its own standard method algorithm on the borough and in this connection TVBC should lobby MHCLG to use the most up-to-date ONS projections (2018-based) in their current review of the Standard Method. However, the SHMA does have an important role in determining the amount and distribution of affordable housing. What is needed is an assessment of the need in different affordability bands. The plan then needs to determine how these are going to be provided. Again the SHMA should use the latest ONS household projections.</p> <p>The last SHMA estimated that 292 new affordable dwellings per year were needed whereas TVBC admit (para. 5.30) to delivering around 200 pa. So</p>

ways of increasing the supply (probably, depending on output of the next SHMA) need to be found, especially in the light of the fact that there are also around 2,000 on the housing waiting list.

The latest NPPG (Sept. 2019, Paragraph: 023 Reference ID: 23b-023-20190901) states that LPAs can set their own threshold in rural areas. In our view affordable housing should be sought on all rural sites accommodating 3 or more dwellings be compatible with the current overall TVBC aim of around 1/3 affordable. Developments in rural areas are often highly sought after and we see no need for the proportion of affordable housing to be reduced with development size in designated rural areas. It is also surely highly undesirable that affordable housing in a small development should be replaced by a financial contribution. The affordable houses are needed in the particular rural community, to keep diversity and provide local accommodation for those in need, not in some nearby town.

TVBC should embrace two of the measures recommended by the Affordable Housing Commission (AHC) – “Making Housing Affordable Again: Rebalancing the Nation’s Housing System Making Housing” published in March 2020. Two major recommendations from the AHC are to:

(1) Redefine affordable housing to reflect incomes not market prices. The Commission proposes a new definition and alternative measures of housing affordability, focused on incomes and personal circumstances, rather than market prices. So that homes would be defined as affordable if they consumed no more than 35% of net household income for lowest quartile income groups in each local authority area. In the next SHMA TVBC should use this definition as well as that in the current NPPF.

(2) Focus on the social rented sector. The Commission highlights that the most striking change in housing over recent decades is the more than doubling in the size of the Private Rental Sector (PRS) – up from less than one in 10 homes to around one in five, in just 20 years. Meanwhile the social housing sector has halved from its peak and shrunk from being three times the size of the PRS to appreciably smaller than it. CPRE believes that TVBC should embrace the concept of council-funded housing to boost the supply of social rented homes.

6

Working in Test Valley (Town Centres and Local Economy)

6.1-6.6

Town centres

Covid-19 is could impact on the viability of town centres as it likely to lead to a permanent reduction in the footfall in some shops with more people opting to buy goods on-line. We endorse the view (I&O para. 6.2) that town centres are likely to move away from being solely retail-led locations to those which offer a wider range of amenities. We endorse many aspects of the Hemmingway plan and also suggest the following measures to improve the

vitality of town centres: (1) business rates and rentals need to be more flexible to stimulate uptake, (2) do more to bring out of town centre shopping into the centre e.g. by giving less permissions for out of centre retail and equalising parking charges between out-of-centre and in-centre car parks, and (3) have policies which encourage more people to live in or close to the town centre. This will directly boost retail trade, boost the evening economy, reduce car use and help minimise greenfield development.

6.7-6.11

Tourism.

See our responses to questions 17 and 18.

7

Enjoying Test Valley (Environment and Quality of Life)

Natural capital and environmental services must underpin decisions in this policy area; no questions are asked on this section but we wish to offer the following opinions

South Hampshire Green Belt

We are disappointed to see no reference to the proposed South Hampshire Green Belt in this report. Green Belt, we believe, is currently the only effective way to prevent urban sprawl in South Hampshire and strongly believe that the exceptional circumstances needed for the designation of a green belt exist in South Hampshire.

There is a strong public feeling towards the green spaces on their doorsteps. CPRE has collected over 14,000 signatures on a petition to establish a Green Belt. The Covid-19 pandemic has emphasised that people depend on the countryside for their mental and physical well-being more than ever.

We are also facing a Climate Emergency and we know that the countryside plays an important part in mitigating climate change. In 2019 CPRE commissioned NEF Consulting, to write a report exploring the Socioeconomic and Environmental Value of the Green Belt area, see <https://www.cprehampshire.org.uk/wp-content/uploads/sites/3/2020/06/NEF-Consulting-Introducing-a-South-Hampshire-Green-Belt-Study-June-2020.pdf>

The report looks into three elements;

- Health and Well-being
- The Economy (including recreation)
- The value of nature and ecosystem services, for example carbon sequestration.

The main message is that the countryside has a quantifiable value in its own

	<p>right. It is also a crucial part of our armoury against climate change.</p>
7.12	<p>Gaps</p> <p>Gaps, local or otherwise, are much valued by local communities and serve a useful purpose in maintaining the separation of settlements, particularly the separation of villages from nearby large towns. As well as helping foster feelings of community within villages, the gaps also have an important and overlooked role as wildlife corridors. So policies should maintain significant gaps between settlements, even when not named gaps and even if the NPPF makes no mention of gaps – the NPPF does not define an exhaustive list of acceptable policies.</p>
7.15	<p>Local green spaces</p> <p>These are identified in Neighbourhood Plans and Village Design Statements and should be protected by policy as they are important to local communities.</p>
7.26-7.30	<p>Sustainable construction and renewable energy</p> <p>Zero carbon housing should be the aim, to be specified by policy, and policies favouring low carbon and renewable energy sources plus water saving and recycling devices should specified now rather than waiting for government 2025 building regulations. Roof solar, house insulation and water recycling are the 3 key factors which need incorporating into all new housing from now on.</p>
7.31-7.32	<p>Biodiversity</p> <p>Wildlife connectivity networks are essential and, as noted above, will be enhanced if local gaps are supported.</p>
7.33	<p>Biodiversity net gains</p> <p>These must be natural habitat gains and not just species count gains which e.g. could allow flowers in gardens to outscore cereal fields.</p>
7.34	<p>Protection of special habitats etc.</p> <p>Nitrates, and their effect on rivers and the Solent, are an important issue and TVBC's intentions here need clarifying and strengthening. Nitrate mitigation measures must relate to the same catchment and not nebulous mitigation many miles away.</p>

7.35-7.38	<p>Public open space</p> <p>The Covid-19 crisis has highlighted the importance of public open spaces and opportunities for informal recreation. With careful thought such spaces can also contribute environmental benefits (e.g. the pollinator strips and wildflower areas at Picket Twenty).</p>
7.39	<p>Trees</p> <p>In urban locations tree planting can help mitigate carbon emissions and also improve air quality; in rural and semi-rural locations increasing tree cover via natural regeneration is preferable to tree planting as it will lead to less plastic tubes in the countryside and more natural woodland.</p>
7.40-7.44	<p>Water supply and quality</p> <p>In our view this part of Issues and Options needs to be considerably strengthened. Water sustainability in Test Valley depends on correct management of water resources (aquifers) and surface stores (streams, rivers).</p> <p>The natural water capital must be protected and issues of water supply and waste water disposal cannot just be passed on to Southern Water. There will be no additional water sources available and rainfall inputs are likely to be fewer and heavier resulting in less infiltration to the aquifers and TVBC should plan accordingly. No reliance should be placed on putative imports from other areas which in any case are examples of robbing Peter to pay Paul. The ageing sewage treatment plants at Fullerton and Chilbolton are near capacity and already leading to over-eutrophication and a decline in the water quality of the Test, notionally one of the UK's most iconic rivers (see https://www.salmon-trout.org/2018/12/17/test-itchen-report).</p> <p>Ways of reducing demand, not just limiting the impact of new development, must be investigated e.g. promoting the use of grey water systems which have the potential to considerably reduce domestic demand for water. Groundwater protection is vital and stronger controls of domestic and industrial liquid waste are needed. BREEAM "excellent" standard must be insisted on and enforced without any 'if financially viable' get out clauses. If TVBC cannot initiate water saving measures then new development must be constrained and resisted.</p>
8	<p>Infrastructure and Community Facilities</p> <p>CPRE supports moves to increase facilities for walking and cyclists and we hope that TVBC will work with HCC to prioritise walking and cycling</p>

infrastructure over new road construction and new Government funding is available for this purpose. The possibility of using disused railway lines for this purpose should be investigated; additional cycling/walking infrastructure would have health benefits and also act as an additional tourist attraction. Alternative (to the car) transport should be designed into new developments from the start. It would be better to fund transport systems that last rather than to give subsidies to transport operators.

EV charging: there is a need for public and domestic charging points for electric vehicles as the use of petrol and diesel fuel is phased out. However, in the longer term, TVBC also needs to consider the infrastructure to support hydrogen-powered fuel cell electric vehicles (FCEV) which are tipped by many experts to succeed EVs within a decade or so.

Responses to TVBC's questions on Issues and Options paper

- Q1** In general we favour persisting with the two HMAs, although some consideration should be given to defining an HMA for Stockbridge since this is a major employment centre. The main purpose of a separate HMA for STV is that it relates to that part of Test Valley included in the PFSH area. It is also justified by its economic and social links with Southampton and the fact that it naturally forms part of the Southampton HMA. The extent of the social and economic links with Southampton should be used to define the parishes within the STV HMA boundary.
- Q2** Apart from the links with Southampton mentioned above, there is no reason for considering the relationships with other major towns outside of the borough such as Winchester, Salisbury or Basingstoke. These have a lesser influence on the parishes and, in any case, it would be difficult to disentangle the relationships that many parishes have with more than one of these various towns.
- Q3** No, the parish boundaries should be used.
- Q4** Yes, there should be more than one tier for the rural villages.
- Q5** On the basis of current facilities and on the need for additional facilities. It seems illogical to deny villages the possibility of additional facilities that are wanted and which some new development might bring.
- Q6** Yes, physically-close rural villages should be considered together if the shared facilities can mostly be accessed by foot.
- Q7** These are special cases which need careful consideration. If the settlement hierarchy is being used to determine potential to absorb more housing then this would be an undesirable outcome. We do not want Andover and Romsey to effectively decamp some of their housing to the neighbouring villages as

	<p>this will just result in increased car use and detract from the vitality of the town centre.</p>
Q8	<p>No, it implies TVBC is being prescriptive about where all new allocations should go – rather than leaving it to the community to decide whenever possible.</p>
Q9	<p>The present approach should be maintained except that it makes no sense to exclude public open spaces from the settlement areas. Such spaces should be protected from development by other policies within the plan.</p>
Q10	<p>Use whole curtilages plus physical boundaries; this question is linked to Qs 11 & 12.</p>
Q11	<p>A more permeable settlement boundary is appropriate but development within the new permeable boundaries should be limited to affordable housing, except in the situation when a housing target is allocated to the parish on account of its position in the settlement hierarchy.</p>
Q12	<p>No, if an essentially strategic allocation has been made to a parish then this development will be a special case and should not affect other aspects of development within the parish. It should be the role of TVBC to allocate a housing target and the role of the local community to decide where it is to go.</p>
Q13	<p>Pass</p>
Q14	<p>Yes, if there is a demand for such plots.</p>
Q15	<p>Only if there is a local demand for them.</p>
Q16	<p>No, TVBC should tackle the issue of climate change by broad policies on building standards and development location. Self-build houses can only form a minute proportion of the total housing development.</p>
Q17-Q18	<p>Needs some flexibility, but want attractions that are open to the general public and not just to cliques e.g. fishing lakes and clay pigeon shoots. Also need to be compatible with their local rural surroundings. Since tourism is an important part of the economy, consideration should also be given to constraining types of development that are unattractive to tourists e.g. storage and distribution centres that disgorge heavy goods traffic onto rural roads</p>