

2.0 Responses to the Refined Issues and Options Consultation Document

Plan Making and Possible Changes to the Planning System

- 2.1 The Council's timetable for producing the local plan is illustrated at paragraph 1.15 of the consultation document. This timeline introduces several additional steps to the statutory process, resulting in the plan taking at least six years to be produced. This length of timeframe has been criticised by the Government and has been a fundamental reason behind new proposed legislation in the White Paper: Planning for the Future, to speed up plan-making to 30 months (2.5 years).
- 2.2 Further, under the current system the Government expects local plans to be reviewed every five years, so they are up to date. Adoption of the new local plan is anticipated in Q3 2024, some three years after the adopted local plan becomes five years old, making the borough vulnerable, particularly given the new Standard Methodology calculations which will increase Test Valley's housing requirement by 48%, to 813 dwellings per year from the current Standard Methodology figure of 550, or a 38% increase from the adopted local plan figure of 588.
- 2.3 It is suggested that the plan-making process is reviewed and sped up and modified to anticipate the new proposed changes from Government, as far as possible at this stage. This can be best achieved by focussing on a sustainable spatial strategy and sustainable development criteria, along with borough-specific aspects that will influence the location and land use requirements such as SANG, nutrient neutrality, flood risk etc, along with aspects the Government is promoting such as biodiversity net gain, climate change, healthy communities and beautiful buildings. It seems that, if primary legislation is enacted by the end of 2021, Test Valley will have an adopted plan by Q3 2024 - but under the new system.

Plan Period

- 2.4 As local plans currently need to plan for a *minimum* of 15 years from adoption, this would mean a plan period up to 2039, not 2036 as previously suggested. However, it is recognised that the new proposed changes say that local plans should plan for a *minimum* of 10 years.
- 2.5 However, as highlighted in section 4, Test Valley is part of the Partnership for South Hampshire and has signed up to the (draft) Statement of Common Ground, which is potentially looking beyond the usual plan period in order to address some fundamental

- 1.5 The site's potential was identified in the Council's SHELAA, February 2018. It was identified as Site 82, a site that "*could contribute to the housing supply in Southern Test Valley that would require a change in policy.*" It was considered to be available, suitable, and achievable, and therefore deliverable for 700 new homes to be delivered over the lifetime of the plan.
- 1.6 These representations set out how through the appropriate distribution of development, the Local Plan can promote sustainable and energy efficient new communities that encourage healthy and active lifestyles within green and biodiverse landscape settings to benefit all its existing and future residents to help meet the Council's Vision and Objectives, as set out in the Refined Issues and Options document.

issues in the area. Wates Development agree with the Council's statement at paragraph 4.7,

"In determining the plan period a balance needs to be struck. This is between having a sufficient length of plan period to provide for a Borough's future planning strategy, and the level of certainty which can be assumed over future circumstances and development needs the further ahead the time horizon, consistent with a robust evidence base."

Duty to Cooperate

2.6 The Statement of Common Ground identifies a huge amount of unmet housing need in the PFSH area.

2.7 The identified shortfall to 2036 in each housing market area (HMA) is as follows:

Southampton HMA -12,926 dwellings

Portsmouth HMA - 4,828 dwellings

Total -17,754 dwellings

2.8 The southern part of Test Valley, including the site at Velmore Farm, lies within the Southampton HMA of PFSH, as currently defined.

2.9 With the various local plans at different stages in the statutory making process, and environmental and physical constraints of some local authorities, the choices of where this unmet need can/should go is limited. Within the Southampton HMA, the options are south Test Valley and south Winchester City.

2.10 Further, the new proposed Standard Methodology could increase the housing requirement in the PFSH area by an average of 25%, further exacerbating this housing crisis. Further, there is an issue about the type of housing that is required. The majority of new housing need is for family housing, which is difficult to provide within the cities and constrained urban areas.

2.11 The Statement of Common Ground currently sets out the workstreams, but no strategy as to how this unmet housing need will be resolved. Maybe the new proposed planning system will assist, as although it removes the duty to cooperate there is an option to consider strategic statutory planning, which PFSH would be in a good place to accommodate.

- 2.12 In the meantime, however, Test Valley has to plan for a fair proportion of the unmet need that's identified up to 2036 – whatever its local plan period is determined to be - taking into account the borough's location within and adjacent to the PFSH boundary and the relative unconstrained nature of its borough. Velmore Farm is ideally located to assist in providing for either the need of Test Valley and/or the unmet need in the Southampton HMA/PFSH area.

Housing Market Areas (Questions 1-3)

- 2.13 The main function of HMAs in the 2019 NPPF is to address cross boundary co-operation on strategic matters and the preparation of statements of common ground as set out in paragraph 61-017 and 61-018 of PPG. This is clearly acknowledged in the continued joint working by the signatory authorities of PFSH and the production of the current (draft) Statement of Common Ground.
- 2.14 The HMA is used to ensure that the key issue of housing needs and distribution across boundaries are addressed and met effectively. As such an HMA could indicate that any unmet needs that may arise in neighbouring authority areas, such as in Southampton, New Forest district or Park Authority, should be met as close as possible to where those needs arise and in line with commuting and migration patterns.
- 2.15 With regard to meeting Test Valley's own need, the 2019 NPPF no longer relies on HMAs for assessment of housing needs. Unmet need for housing similarly is not based solely on HMAs, with Councils being asked to consider this on the basis of neighbouring areas. As such, Test Valley can meet its own minimum housing needs *anywhere* in the borough if that approach is sustainable, there is no need to base delivery of its own needs on HMAs.
- 2.16 As such, it is suggested that the southern part of Test Valley borough could address a fair proportion of the unmet needs from the Southampton HMA and the rest of the borough addresses the borough's own need.

Sustainable Development

- 2.17 The refined Issues and Options document is framed as providing a high-level overview of the issues affecting the borough and the potential options to address them. However, in the questions it asks it primarily focusses on some quite detailed and narrowly defined housing

- matters as opposed to setting out and asking questions on some more fundamental issues. For example, it contains little on how the growth of the borough can best be balanced in a sustainable way or addressing climate change along with other known national priorities, such as healthy communities and biodiversity. It also does not address the significance of nutrient neutrality, one of the most crucial issues affecting the provision of new homes and land use in the borough. It also does not recognise its relationship with neighbouring authorities, not only in unmet housing need, but also in terms of environmental constraints such as the New Forest and Solent European protected areas which may also affect land use.
- 2.18 Paragraph 8 of NPPF 2019 sets out the overarching objectives of achieving sustainable development, which it states are interdependent and need to be pursued in mutually supportive ways, so that "*the opportunities can be taken to secure net gains across each of the different objectives*" of economic, social and environmental objectives.
- 2.19 The starting point for a local plan, once land has been identified as available, suitable and achievable, and therefore deliverable, should be considering how sustainable development can be achieved spatially, at different scales, to achieve the housing need of an area, taking into account where the need for development arises (including unmet need from neighbouring authorities) key infrastructure (existing and opportunities to improve or provide new) as well as relationships with the wider geography the area.
- 2.20 Further, to accord with the NPPF, the Local Plan should identify a spatial strategy that provides for healthier lifestyles by ensuring that new development provides all types of new homes in sustainable locations with good access to major economic hubs, large employment areas and key social infrastructure such as schools via means of walking, cycling and/or public transport. This way, the reliance on the car could be reduced, which would also support the Council's Climate Emergency Action Plan and Vision and Objectives for the local plan.
- 2.21 This is particularly important in a borough such as Test Valley which has acknowledged very high levels of car use in comparison to the national average. Whilst it is recognised that Test Valley's car ownership is likely to remain above the national average due to the rural nature of the borough, the spatial strategy should focus growth where reliance on the car can be minimised. For example, in locations with excellent access by sustainable modes to services, facilities and employment, where residents have a choice not to use their car.

- 2.22 It is accepted in NPPF 2019, paragraph 72, that *"the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities."*
- 2.23 These types of sites, such as Velmore Farm, can also provide opportunities to enhance existing or create new areas of public open space, community facilities and employment to enhance biodiversity, support mental wellbeing and social cohesion, as well as promoting sustainable, resilient and healthy lifestyles, by encouraging people to use local, walkable co-located uses that are well connected and easily accessible.
- 2.24 The Covid-19 pandemic has led to a new way of working, living, shopping, and getting exercise. In the housebuilding industry there has been a notable increase in demand for houses as opposed to flats, flexible living and working space, good size private outdoor space and easily accessed public open space which provides variety and interest for all ages and the opportunity to exercise from the front door. Large sites, such as Velmore Farm can offer all this as well as accommodating other needs of a new community. Opportunities in town centres or on small sites will not be readily able to provide such requirements.
- 2.25 Such development proposals would help address most of the key issues raised by respondents in the last consultation as set in paragraph 2.20 of the Refined Issues and Options document (accessibility by public transport and cycle routes, a need for more affordable housing and housing for an ageing population, infrastructure including broadband and community facilities and services, climate change, renewable energy, open spaces for healthy lifestyles, the natural environment and biodiversity, and the protection of natural resources and assets).

Living in Test Valley (Questions 4-12)

- 2.26 Section 5 of the consultation document addresses 'Living in Test Valley'. Paragraph 5.7 states that at present there is no evidence of any unmet need in neighbouring local authority areas which would potentially need to be considered. Clearly this does not take into account the draft PfSH Statement of Common Ground referenced earlier in the consultation document, which sets out the unmet housing need in the PfSH area, authority by authority, in Table 3 (of draft document presented to PfSH Joint Committee on 14 October 2019). See paragraphs 2.6-2.12 of these representations for more comment on this issue.

- Paragraph 5.8 refers to the next stage of a Preferred Options (Reg 18) being a full draft local plan. This is welcomed. It will be good to see the ambitions for the borough and all the key policy matters that must be addressed and balanced.
- 2.27 The Local Plan should be ambitious and seek to plan to ensure that existing and future communities thrive. The Local Plan should embed the economic growth plans of the area and ensure that it supports a strong and competitive economy. The NPPF (2018) paragraph 92 highlights that local policies should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. Wates believes that the emerging Local Plan should be seeking to guide development towards the most sustainable locations in the Borough to ensure that healthy and resilient communities are achieved.
- 2.28 It is noted that there is no reference in Section 5 to sustainable development. Paragraph 2.21, however, states that, "*New development should be in sustainable locations, with public transport access and designed to respect the character of the place. This should also be designed to minimise carbon emissions and mitigate against climate change. The mix of new housing should also greater reflect local needs*". It is suggested that this is the basis for determining the hierarchy of settlements. Settlement boundaries should reflect existing, consented, and proposed development, as planning permissions and allocations should/would have been considered against sustainable development criteria.
- 2.29 It is important for any town, urban area or village to receive proportionate growth, providing they are in a sustainable location and have, or could have, services and facilities to support a growing community throughout the plan period and beyond. Development should enhance the community and not just impact on it; therefore, size and location must be carefully considered. Not every settlement in Test Valley will have the appropriate level of services and facilities to be considered appropriate for development under a sustainable spatial strategy.
- 2.30 Whilst most of the strategic growth has previously been focused around the towns of Romsey and Andover, it is important that the Council focuses future growth in the most sustainable locations and not just the two major centres.
- 2.31 For the reasons set out above regarding unmet need in neighbouring authorities, the Council must place weight on considering how these unmet needs can be met in the area where the need arises and play its part in providing much needed housing for the

its own community and the wider area, in addition to meeting its own housing needs in this part of the borough.

- 2.32 In southern Test Valley, there is the opportunity to provide well located new homes adjacent to sustainable settlements and communities outside the borough boundary, where there is a wide range of facilities, services, transport infrastructure and employment and a fantastic relationship with the wider PfSH area. A new community, at Velmore Farm would be designed to create a sustainable place that would reflect Test Valley's historic development pattern and would not be just another extension to Chandler's Ford.
- 2.33 The Local Plan should strive to provide affordable housing in sustainable locations with good accessibility to public transport to help reduce the reliance on the private car. Velmore Farm is located very close to major centres and is highly accessible via public transport. Focusing new development in highly accessible, sustainable locations may increase the use of public transport.
- 2.34 It should also be noted that Romsey accommodated a significant amount of the borough's growth in the last plan period. The emerging Local Plan's spatial strategy needs to be mindful of the need for sites to maintain a rolling housing land supply. It is considered that given the recent growth at Romsey, additional locations in southern Test Valley are required to meet the housing needs of the Borough's residents, the Housing Market Area, and any neighbouring unmet needs. Velmore Farm is located within a sustainable, accessible part of southern Test Valley and as such should be considered as a site for future growth to support the Borough's needs.

Self Build Housing (Questions 13-16)

- 2.35 Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties can also provide market or affordable housing. So, yes, there should be a specific policy for self-build homes.

Working in Test Valley (Town Centres and Local Economy)

- 2.36 Town centre local plan policies need to be more future-focussed, flexible and resilient to reflect the way people will use town centres in the future.
- 2.37 Given the changes in retail that have happened in the last couple of years, it is unlikely that existing centres will operate on the traditional model of being 'anchored' by convenience and comparison retail premises.
- 2.38 Centres should be planned around people interacting, bonding, growing, and becoming more empowered. Centres should be focussed on the co-location of uses such as education, sport, leisure and recreation (formal and informal), employment, civic/governance, cultural health, community, retail, social (informal and formal) open spaces and transport interchanges. They should not be fixed by boundaries so that they become stagnant or even obsolete, but fluid and flexible to allow for a variety of uses and the centre for events, pop-ups or meanwhile uses.
- 2.39 Paragraph 6.12 of the consultation document states, "A strong and robust local economy is key to delivering prosperity and quality of life. The next Local Plan will aim to be positive in supporting future economic growth and productivity, alongside quality of life and protecting the Borough's environmental assets which are also important in making the area an attractive business location". This statement is welcomed.
- 2.40 It is considered that the location of new employment areas should be located where there is an identified need and demand. The Local Plan should provide clear evidence to guide an economic growth strategy for the Borough, in particular the strategy should identify the types of employment that are required and where such employment should be focused.
- 2.41 In line with paragraph 92 of the NPPF (2018), opportunities to integrate housing with employment should be maximised. This is particularly relevant where there is the opportunity to deliver expansions of already successful employment locations alongside housing and community facilities as there is an established demand for employment in that location. In addition, new employment must be located in sustainable locations, with good access to public transport to attract both employers and employees. For example, the land promoted by our client at Velmore Farm offers the opportunity to expand existing successful business parks alongside the delivery of housing and community facilities in a sustainable location.

Enjoying Test Valley (Environment and Quality of Life)

- 2.42 The Test Valley landscape is varied and greatly appreciated by its residents and should be protected and enhanced through local plan policy where there are recognised valued landscapes such as National Parks and AONBs, as set out in the NPPF.
- 2.43 In order to minimise impact and create a special living environment, the proposal at Velmore Farm would be landscape-led in its layout and design, responding to its context and assimilating into the landscape; providing buffers of open space and a green infrastructure network; protecting and enhancing natural landscape and biodiversity features and the footpath; and strengthening the site's links and relationship with its surroundings.
- 2.44 It is good to see in paragraph 7.13 of the consultation document, that the Council recognises that there is no reference to local gaps in the NPPF and as such has no formal basis for inclusion in the local plan, regardless of local support.
- 2.45 If the local plan is going to continue such a designation, which could render the plan unsound as it would not be in accordance with national policy, it should clearly evidence what it is that requires extra protection and justifying why the land is essential to prevent the coalescence of settlements having regard to maintaining their physical and visual separation, and include a criteria policy that accords with the NPPF.