

Test Valley Borough Council: Refined Issues and Options Consultation (August 2020)

Hampshire County Council, as a landowner, offers the following comments, in the spirit of its duty to cooperate, in line with the Town Planning (Local Plan) Regulations and to ensure future Test Valley Borough Council's development plan documents would be positively prepared, justified, and consistent with national policy.

Consultation question / ref	Comments
Housing Market Areas	
Question 1: Should (a) we maintain the two existing HMAs, but perhaps with a revised boundary between them, such as enlarging the area within STV HMA. If so, what additional area(s) of the Borough should be included within STV HMA? Alternatively, (b) should a single HMA for the whole of Test Valley be used? Or (c) should additional HMAs be created, increasing the number to 3 or 4, with the additional HMA(s) applying to the rural area?	<u>Comment:</u> The County Council in its view as a landowner considers that Test Valley Borough comprises two rather distinct Housing Market Areas (HMAs) in the north and south. On this basis the County Council, as landowner, considers that there could be at least two HMAs in the Borough or more, based on appropriate evidence (see Question 3 response), and not a single HMA for the whole of Test Valley.
Question 3: Should an alternative approach to using parish boundaries be used for HMAs? If so, would this be easily be identifiable and practical for monitoring purposes?	<u>Comment:</u> The County Council in its view as a landowner, does not support the approach of using parish boundaries for Housing Market Areas (HMAs) because the division HMAs at the parish boundaries level is too fine-grained and it is not strategic. The National Planning Policy Framework (NPPF) 2019, paragraph 35(a) states that local plan should "seeks to meet the area's objectively assessed needs..." and "where this relates to housing, such need should be assessed using a clear and justified methods....". To provide further context, the previous Planning Practice Guidance (2014) defines HMAs as: "A housing market area is geographical area defined by household demand and

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	<i>preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It might be the case that housing market areas overlap"</i> (MHCLG, Housing and economic development needs assessments, Paragraph 010 Reference ID: 2a-010-20140306). Additionally, an analysis provided by Geography of Housing Market Areas, a study commissioned by the former National Housing and Planning Advice Unit (NHPAU) and published by CLG in 2010 highlights that the drawing of HMAs boundaries should include considerations of a variety of information sources and factors, such as house prices, household migration and commuting patterns, and level of self-containment. It should be noted that social-economic activities could be cross-boundary at local and strategic levels. Hence, the County Council considers that the approach of defining HMAs based on local parish administrative boundaries would not be in line with the NPPF (2019).
Settlement Hierarchy Question 4: Should the number steps of the settlement hierarchy be increased, for example by sub-dividing the 'rural villages' into two separate tiers?	<u>Comment:</u> The County Council as a landowner agrees that it could be appropriate to sub-divide the rural villages into two separate tiers where the range of facilities are greater and support the daily needs of residents. For example, the more sustainable rural villages could accommodate small scale employment development and strategic allocations of proportionate scale. This could contribute to maintaining the vitality and sustain critical population mass to maintain existing services.

Consultation question / ref	Comments
Question 5: How should we decide which settlements to include within each step of the settlement hierarchy?	<u>Comment:</u> The County Council as a landowner considers that the inclusion of settlements in the hierarchy should be based upon a detail settlement hierarchy analysis, based on audits of the types of facilities and services in all settlements, frequency of usage and levels of accessibility to these services. One approach the Borough Council might want to consider is the '20-minute neighbourhood' principles. Settlements with evidence of good provision of amenities and accessibility should be given higher tier in the settlement hierarchy. The County Council suggests that under 'Leisure Facilities' settlement hierarchy criteria, it could include green infrastructure such as right of way footpaths, cycle lanes and a graded approach may be appropriate (similar to the public transport provision criteria).
Question 6: Should we consider groups of rural settlements together, where these are closely related to each other and/or share facilities and services?	<u>Comment:</u> As a landowner, the County Council's general view is that it may be appropriate to group rural settlements together, but there are a number of factors to be carefully considered. This not only includes factors such as size and population of the settlements, but also accessibility to services and facilities, as well as physical connectivity in terms of walking, cycling and public transport.
Question 7: How should we treat rural settlements which are close to other larger settlements and can therefore also easily access their facilities and services?	<u>Comment:</u> The Borough Council should have regard to rural settlements' accessibility to the larger settlements' facilities, as well as the proximity when assessing potential for sustainable growth. Refer to Question 6 response.

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Settlement Boundaries	
Question 8: In updating the settlement boundaries to reflect recent development which has built and development with planning permission, should we also include new allocations?	<u>Comment:</u> The County Council, as a landowner, supports the approach that new allocations are included in settlement boundaries. It is the County Council's view, as landowner, that the purpose of a new allocation is for the change of use of a site to development from agricultural land uses. By including new allocations in settlement boundaries, the presumption in favour of sustainable development would apply. This means that development within new allocations are generally acceptable in principle. Settlement boundaries therefore should be amended to reflect this change to avoid any potential conflicting planning policy intentions. This would provide greater confidence for landowners, such as the County Council, to bring forward sites within its control for developments more readily. This in turns enhances certainty of delivery. As a landowner, the County Council has been supporting the Borough Council by putting forward public land for development by responding to the Borough Council's SHELAA and call-for-sites consultations.
Question 9: How should we define settlement boundaries? What types of land uses should be included, such as public open space?	<u>Comment:</u> The County Council in its role, as both a public landowner and service provider support the current approach where settlement boundaries are based upon identifiable boundaries and physical features. In addition to the approach, the County Council suggest that when determining settlement boundaries, an element of flexibility could be included, where consideration could be given on a case-by-case basis, based on particular area and land uses. The County Council supports the inclusion of public open spaces in settlement boundaries, as well as the current approach where full curtilages are included in settlement boundaries, for example, a school site and its playing field. The County Council as an education authority

Consultation question / ref	Comments
	has on-going responsibilities in managing its education facilities (including school playing field) and securing future improvements. Paragraph 94 of the National Planning Policy Framework (NPPF) states that <i>"it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement"</i>. Where central government funding is not available, the only way that education improvements can be funded is through developer contributions and through the disposal of surplus land within school sites. According to Section 77 of the School Standards and Framework Act 1998 (as amended), the County Council is able to promote the disposal of surplus school facilities for alternative development where it can be demonstrated the land is surplus to the requirements of both the subject school and other Local Education Authority (LEA) schools within the local area, and that the proceeds from the sale of the surplus land is re-invested by the LEA into education, sport and/or recreational facilities. Hence, the inclusion of school playing field in settlement boundaries would provide the County Council's role as landowner and service provider agility and flexibility to respond to unexpected changes (i.e. investment of refurbishment or reconfiguration of school site) during the Local Plan period.
Question 10: Should the approach to using whole curtilages for defining settlement boundaries be retained, or should we take account of physical boundaries which extend beyond curtilages, or limit settlement boundaries to only parts of curtilages?	<u>Comment:</u> The County Council as a landowner is supportive of the Borough Council's current approach where settlement boundaries are determined based on the whole curtilages. The County Council considers that with whole curtilages retained when defining settlement boundaries, it will enable comprehensive development and holistic approach to design. Refer to Question 9 response.

Consultation question / ref	Comments
Question 11: Should settlement boundaries be drawn more tightly or more loosely, and perhaps reflecting which tier settlement is within the settlement hierarchy?	<u>Comment:</u> The County Council as a landowner considers that the settlement boundaries should be more loosely defined to provide agility and flexibility for unexpected changes throughout the Local Plan period, which could come about in response to the need for strategic infrastructure, maintaining the supply of housing, or unexpected physical or environmental constraints.
Question 12: Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment?	<u>Comment:</u> The County Council is supportive of this approach which the settlement boundaries would provide further opportunities for further limited growth beyond infill and redevelopment. The County Council considers that these further opportunities would help continue to meet housing market demand and needs (i.e. windfalls), and support the delivery of local public services and infrastructure.
Self-build and Custom-build housing	
Question 16: Could the introduction of a self-build housing policy also be an opportunity for the Council to tackle the issue of climate change?	<u>Comment:</u> The County Council as a landowner considers that all new housing should contribute to tackling the issues of climate change through e.g. high-quality design and energy efficient standards rather than just through self-build housing. The quantity of self-build housing alone is much smaller in comparison to the proportion of new homes that are likely to come forward from private house builders / developers during the Plan period and hence the contribution of self-build housing towards climate change is likely to be limited.