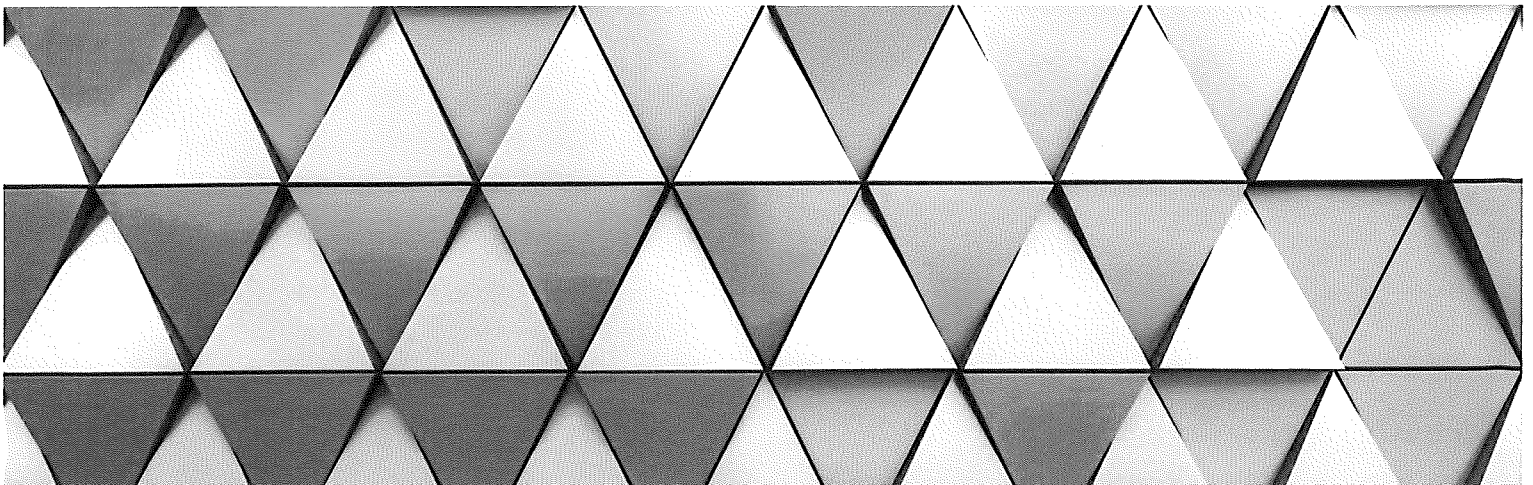


# Test Valley Borough Council

## Next Local Plan – Refined Issues and Options Consultation

**Representations on behalf of CEG**

August 2020



**Contact**

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## 1. Introduction

- 1.1 These representations are made to Test Valley Borough Council's ("**the Council**") 'Next Local Plan – Refined Issues and Options Consultation' ("**the Consultation**") on behalf of CEG.
- 1.2 The Consultation is a key stage in the Council's preparation of its new Local Plan ("**the Emerging LP**"), which will provide for future growth and development in the Borough, whether this is up to 2036 or for a longer plan period.
- 1.3 The Consultation seeks to build upon the outcomes of the previous 'Issues and Options Consultation' in 2018 (to which CEG responded to), providing further detail on key plan-making matters going forwards.
- 1.4 One focus of the Consultation is that the Emerging LP must provide for the right number of new houses in the right location – to ensure a sufficient supply of market and affordable homes for current and future generations. As well as discussion of the Council's housing need, questions are raised by the Consultation in relation to the distribution of housing across the Borough; the future role of neighbourhood plans; and how the settlement hierarchy should be considered.
- 1.5 The Government's standardised methodology will prescribe the Council's housing requirement, along with any unmet need from other authorities, but it is the relationship of Test Valley to its neighbouring authorities that should influence where those new homes should go. In particular that the south of the Borough has strong functional connections with Southampton and the Solent sub-region.
- 1.6 CEG's interest in the Emerging LP is that it is the sole freehold owner of land at Rownhams Lane, Rownhams ("**the Site**"), identified as ID210 in the Council's Strategic Housing and Economic Land Availability Assessment (February 2018) ("**the SHELAA**").
- 1.7 A detailed submission setting out the suitability of the Site, together with the development opportunity and vision, was presented in response to the Council's call for sites in October 2017. This explains that:
  - the Site is wholly suitable for development, most notably with its close relationship to the existing settlement of Nursling and Rownhams – a second tier settlement behind only

Andover and Romsey, which the Revised Local Plan 2011-2029 identifies as suitable for residential allocations of a strategic size;

- the Site is available for development, with a single landowner (CEG) making delivery of housing less complicated and therefore faster;
- the Site has a great degree of natural containment in the landscape;
- the Site abuts the 'Key Service Centre' of Nursling and Rownhams and is within walking and cycling distance of the services and facilities within Rownhams and Lordshill. The 'Key Service Centre' role of Nursling and Rownhams is reinforced by its strong relationship with employment areas and other services in the adjoining areas of Southampton;
- the suitability of the Site was considered by the appeal Inspector in allowing the development adjacent to the west of the Site (APP/C1760/A/14/2224913) ("**the Approved Scheme**"); *"The Appeal Site is in an accessible and sustainable location, adjoining the existing settlement boundary as an extension of Rownhams. The Appeal Site is appropriate for the Appeal Scheme"*;
- there is headroom in the SANG provided by the Approved Scheme to mitigate any impact on European protected sites that development on the Site might cause from increased recreational pressure; and
- as suitable and available land, residential development of up to 300 dwellings on the Site will help meet the housing requirement of Southern Test Valley which is part of the wider Southampton Housing Market Area (HMA) and Partnership for South Hampshire.

1.8 In response to the Consultation, these representations address:

- i. implications of the Council's housing requirement through the revised standardised methodology currently being consulted on; and
- ii. matters concerning what the appropriate spatial strategy and distribution of new homes should be.

- 1.9 This submission also takes the opportunity to reinforce the sustainable merits and development opportunity of the Site at Rownhams.

## 2. Amount and Distribution of Growth

- 2.1 The presumption in favour of sustainable development is at the heart of the National Planning Policy Framework ("the Framework") – that plans should meet the development needs of their area, providing as a minimum the objectively assessed needs for housing, as well as needs that cannot be met within neighbouring areas.

### Housing Requirement

- 2.2 Since introduced by the Framework in 2018, the Government's standardised methodology is the approach for calculating the minimum level of housing need and growth.
- 2.3 The Consultation refers to a figure of 550 dwellings per annum (dpa) using the current standardised methodology, but the Government has published for consultation a revised approach that places greater emphasis on affordability and on achieving the number of new homes nationally that are required.
- 2.4 For the Council, this revised methodology will significantly increase its housing requirement to 813 dpa. This should be welcomed by the Council as a means of helping increase affordability in line with a priority of its Corporate Plan – for house prices to enable residents and their families to stay in Test Valley.
- 2.5 Whilst the revised standardised methodology is subject to consultation until October, any change can quickly be introduced through a change to the Planning Practice Guidance. Given the importance Government is attaching to ensuring sufficient new homes are built, it is highly likely that the revised standardised methodology will be taken forward and will provide for at least the number of houses set out in the consultation.
- 2.6 The standardised methodology sets the minimum number of homes, and the Council is able to consider whether local circumstances mean that actual need is higher than that. One reason may be job-led and to achieve economic growth – that housing can encourage sustainable economic growth and productivity.
- 2.7 The economic strategy for STV (along with the wider Solent region) is presented by the Solent LEP in its 'Transforming Solent Growth Strategy' (January 2015). The need to provide sufficient housing to

support the growing workforce is one of its key objectives and priorities, along with maximising the effectiveness of the region's economic assets and promoting the Solent in the global market place.

- 2.8 The Consultation makes reference that the Council may consider whether alternative methodologies for calculating its housing requirement should be progressed. On this the Framework is clear that 'exceptional circumstances' would be needed to do so, as well as any alternative still reflecting current and future demographic trends and market signals. Should the Council seek to justify an alternative and lower housing requirement, its reasons for doing so would need to be examined in great detail.
- 2.9 The Consultation refers to the nutrient neutrality issue affecting the Solent and that a future update on this matter will be provided. Commitment from the Council that it will work positively and proactively with others to find solutions would be welcome, to ensure delivery of the number of new homes required as well as appropriate environmental protection. To not do so, with implications on development and growth, would undermine social and economic sustainability across the Borough.

#### Unmet Need

- 2.10 The Framework (paragraphs 11 and 60) places the requirement for strategic policies to accommodate any needs that cannot be met within neighbouring authorities at the heart of sustainable plan-making. Such cooperation is of course also a statutory requirement.
- 2.11 The Consultation considers that currently there is no evidence of any unmet housing need in neighbouring local authorities that should inform the Emerging LP. But this cannot be established ahead of the expected 'Joint Statement of Common Ground' by the Partnership for South Hampshire (PfSH), especially now in the context of the revised standardised methodology.
- 2.12 Indeed, several PfSH authorities are seeing a significant rise in their local housing need including Eastleigh (+27%) and Winchester (+67%), as well as Test Valley (+48%).

### **Housing Distribution**

#### Housing Market Areas

- 2.13 The Consultation identifies the majority of previous consultation responses to support the two HMAs in Test Valley Borough – one covering the northern area, focussed around Andover (NTV); the other



comprising STV, around the settlements of Romsey and Key Service Centres including Nursling & Rownhams.

2.14 Retaining the two HMAs in the Emerging LP is appropriate and justified:

- the current Local Plan explains (paragraph 2.29) that STV is functionally connected with good transport links to the towns and cities in south Hampshire (including Southampton, Eastleigh and Winchester, as well as other authority areas). Consequentially residents of STV look to this area – particularly Southampton (Local Plan paragraph 2.30) – for a range of services and facilities;
- dependency with Southampton is mutual, with STV providing a number of high value business sites including Adanac Park and the Nursling Estate. The current Local Plan (paragraph 2.29) identifies a significant inward flow of workers to STV and recognises the sustainable merits of accommodating housing growth where it is closest to employment opportunities;
- in contrast, NTV is focussed around Andover, which has a high degree of self-containment and relative distance from other larger centres including Basingstoke, Winchester, Southampton and Salisbury (Local Plan paragraph 2.25). 70% of residents in Andover also work in the town; and
- this stark difference in economic and functional dependencies justifies STV being in the Southampton HMA, whilst Andover and NTV should remain within the central Hampshire HMA. Otherwise, a single HMA would be perverse with unsustainable outcomes – that it could enable homes required in relation to the housing needs of the Partnership for South Hampshire and Solent region to be accommodated in the relatively isolated and self-contained town of Andover.

2.15 This logical two HMA approach is also recognised by the PfSH, as well as the respective local economic partnerships (LEP) – Solent LEP (covering STV) and Enterprise M3 LEP (covering NTV).

2.16 The Consultation asks whether the boundary between the two HMAs should be reviewed. However, the effectiveness of a larger STV area in delivering sustainable development would be questioned. Areas beyond the current STV boundary to the north and west are more isolated and less accessible

to Southampton and the strategic road network. An expanded area would only contain a number of Rural Villages, which are inherently less sustainable and less suitable for significant growth than the higher tier settlements already in STV.

#### Approach to Distribution

- 2.17 Assurance in the Consultation that strategic sites will be allocated through the Emerging LP is welcomed, as such reliance on neighbourhood plans or a coarse approach based only on the size of existing settlements are considered (as set out in CEG's previous consultation response) to be ineffective and would lead to unsustainable patterns of growth.
- 2.18 The Consultation questions what the scale of growth should be for the rural areas in Test Valley, referring to support for a wider distribution of housing to a larger number of settlements. However, a dispersed approach that would place significant growth away from the higher tier settlements would again not lead to a sustainable pattern of development. This would be contrary to what was considered sustainable (and sound) in the current Local Plan – of making allocations concentrated around the higher tier settlements ('Major Centres' and 'Key Service Centres') and limiting development in the smaller 'Rural Villages' and countryside.
- 2.19 The Consultation considers the potential for a non-strategic role of neighbourhood plans in providing housing to meet local needs and sustain rural communities. In principle this can be effective, but there should not be an over reliance on that system, otherwise (if used for more than local needs) its fragmented and ad hoc nature has the potential to deliver an inappropriate pattern of development.
- 2.20 This unpredictability of neighbourhood plans is recognised by the Consultation – that development through them may not come forward as envisaged, requiring additional plan-making to fill a potential shortfall. Instead, a more effective approach to avoid such uncertainty is for the Emerging LP itself to make full provision for sufficient growth across the plan period, with neighbourhood plans accommodating additional small scale housing as might be favoured by local communities.
- 2.21 The Consultation raises questions in relation to the settlement hierarchy, including how to treat settlements that are close to other larger settlements and can easily access their facilities and services. Whilst this question is directed towards 'Rural Villages', the same must apply for higher tier settlements such as Nursling and Rownhams that has great accessibility and interdependences with Southampton.

- 2.22 Maintaining this focus on STV, any spatial strategy, for reasons of proximity to employment opportunities, transport infrastructure and reducing the need to travel, should look to accommodate future development as close as possible to Southampton as the highest tier sub-regional settlement.
- 2.23 As development on the Site would be wholly consistent with this appropriate strategy, the Emerging LP should accordingly allocate it for housing.

### 3. Development on land at Rownhams Lane

3.1 In response to the Council's latest call for sites, the suitability of development on the Site was presented in the Vision Document. This document has now been updated and is enclosed as **Appendix A** to these representations.

3.2 Key aspects of the Site that make it suitable for development are:

- its contiguous relationship with the 'Key Service Centre' of Nursling & Rownhams (the built form of the Approved Scheme will be a natural part of the settlement, with an appropriate adjustment of the settlement boundary);
- that it is extremely well contained by natural landscape features, greatly screened to the east and south by woodland;
- that it is not constrained by heritage assets; and
- that the adjacent SANG has capacity to further mitigate any additional recreational pressure on European protected sites.

3.3 Reinforcing this suitability are the findings of the appeal Inspector for the Approved Scheme, which remain relevant for the Site (with reference to the paragraphs of the appeal decision APP/C1760/A/14/2224913):

- significant tree planting to the north of the access off Rownhams Lane would effectively screen the development in views from existing public highways (paragraph 32);
- tree planting along the northern edge of the housing development would providing screening in views from the public footpath (paragraph 32);
- from the M27 motorway, the housing development would be screened by significant tree planting and separated by the SANG – development would not be intrusive in views of the rural landscape (paragraph 33);

- tree planting around the SANG would attenuate noise from the motorway to a significant degree; and it is noted that existing housing in Rownhams is closer to the motorway (paragraph 38);
- buffer zones between the built development and Clam's Copse and the paddocks and Lord's Wood would maintain the woodlands' nature conservation status (paragraph 39). There would be a net gain in biodiversity (paragraph 55);
- the bus stop on Horn's Drove is within easy walking distance (paragraph 42); and bus route 4, from this stop, connects to the central railway station in Southampton and other bus services at Lordshill, providing residents with frequent and nearby access to public transport (paragraph 43);
- Lordshill local centre, which is within walking distance of the development, includes a supermarket, medical centre, library, post office, public house and church, amongst other services. It is also within easy cycling distance (paragraph 44); and
- overall, the development has no significant adverse impact on the visual amenity of the area, highway safety or local infrastructure. The site is a sustainable location for residential development (paragraph 47).

3.4 The Council has considered the Site in the SHELAA. Whilst a number of constraints are identified – including TPOs and the adjacency to 'Sites of Importance for Nature Conservation' and ancient woodland – the Vision Document and appeal decision of the Approved Scheme demonstrate how these can be successfully addressed in any development through sensitive design. Likewise, the eastern edge of the Site being in flood zone 2 can be accommodated with an appropriate layout.

3.5 The SHELAA identifies the M27 motorway as a significant noise source that constrains development. However, very recent decisions by the Council on the Reserved Matters for the Approved Scheme, as well as the considered views of the Planning Inspector in granting outline permission, demonstrate that such noise can be addressed and development is acceptable. The noise climate on the Site is not significantly different to that of the Approved Scheme.

3.6 In the Reserved Matters applications pursuant to the outline planning permission, which the Council's Planning Committee resolved to approve in July 2018, planning officers reported that the dwellings

would have an internal noise environment compliant with the requirements of the Council's environmental protection officer. With the use of acoustically attenuated ventilation if necessary, it was considered:

*"that future occupiers of the proposed dwellings would not experience levels of noise that would adversely affect their amenities. The proposals are considered to comply with policy LHW4 of the RLP in this regard."*

- 3.7 Therefore, it cannot be said that the Site is unsuitable for development based on any noise from the motorway.
- 3.8 The SHELAA alleges that there are *"no local amenities within walking distance"*; but it is unclear on what evidence this is based on. The Vision Document shows a significant range of facilities, many accessible by foot and many more by cycle, within the Key Service Centre and the neighbouring urban area of Southampton, including Lordshill local centre and bus interchange. Indeed, the Inspector for the Approved Scheme also considered this to be the case – that Lordshill is within walking and easy cycling distance.
- 3.9 For those who may not wish to walk or cycle, the SHELAA identifies the bus stop on Rownhams Lane close to the Site, from where there is access to the wider bus network serving locations including Romsey, Southampton Hospital, Southampton city centre and Adanac Park. As agreed by the appeal Inspector for the Approved Scheme, this provides residents with frequent and nearby access to public transport.
- 3.10 It is therefore considered that significant future development on the Site would be consistent with paragraph 103 of the Framework – that the Site is a location which is sustainable through limiting the need to travel and offering a genuine choice of transport modes. In turn, this can help reduce congestion and emissions, and improve air quality and public health.
- 3.11 Overall, it is demonstrated that there are no reasons why the Site cannot be considered suitable for development. It is in a highly sustainable location, capable of making a meaningful contribution towards the need for market and affordable housing within STV and the wider Southampton HMA.

## 4. Conclusions

4.1 These representations respond to the Consultation and specifically in relation to how the Council should plan to meet its current and future housing need.

4.2 In this regard it is considered that:

- a higher local housing need through the revised standardised methodology should be welcomed as helping increase affordability across the Borough;
- an argument of what 'exceptional circumstances' might be to seek to justify a lower housing requirement is not envisaged and would be examined in great detail;
- the Council's commitment to find solutions to the nutrient neutrality issue is welcomed, but to not do so would undermine social and economic sustainability across the Borough;
- it is premature for the Council to take the position that there are no unmet needs from other authorities that will need to be accommodated;
- the two current HMAs should be retained and the boundary kept unaltered;
- assurance that strategic sites will be allocated through the Emerging LP is positive, but over reliance on development in 'Rural Villages' or through neighbourhood plans is likely to result in an unpredictable and unsustainable pattern of development; and
- strategic growth in STV must recognise Southampton as the main generator of travel and highest tier sub-regional settlement providing a range of key services and amenities for local residents. Significant housing development should be focussed where it is most accessible to the city.

4.3 Therefore, as the Site is both suitable and located where it is consistent with the most sustainable distribution of housing growth in STV – of locating development close to Southampton and other nearby employment opportunities so to maximise sustainable forms of transport and minimise the need to travel – it should be allocated in the Emerging LP for housing development.

# Appendix A