

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:
Planning Policy and Economic Development Service
Test Valley Borough Council
Beech Hurst
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:

N/a

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
Overarching comment	<p>Our representations on the Local Plan consultation document (set out in turn below) aim to respond positively, but with three important caveats:</p> <ol style="list-style-type: none"> 1. It is unfortunate that the timetable for Local Plan preparation has substantially slipped; this appears to be mainly due to several non-statutory phases of consultation. Although consultation is necessary and important, the delay is out of keeping with the thrust of the NPPF and the government's new proposals for the planning system. The remedy should be to review the LDS and accelerate the process as much as practicable. 2. Due regard must be taken to the revised Standard Method which indicates that Test Valley will have to deliver significantly higher levels of growth in future; potentially in the order of 800 dwellings per year. Having indicated support for the Standard Method previously (when it showed a lower figure), it is vital that TVBC does not backtrack. 3. We accept that TVBC has to review whether it is correct to continue with the basic tenets of the existing Local Plan (e.g. of directing most development to the larger settlements and maintaining separate targets for the north and south, responding to economic geography). However, the fundamentals are unchanged, and in the interest of delivering a timely plan the Council should avoid spending time unduly in considering unrealistic alternatives.
Paragraphs 1.5, 2.26	<p>Although TVBC has <i>started</i> its review within 5 years of the adoption of the Local Plan, it is unfortunate that the latest timetable for Local Plan production is far more drawn-out than the previous one, encompassing several non-statutory consultations before the plan is submitted in Q3 2023 (some 5 years after the first 'Issues and Options' document). At present the plan is not due to be adopted until Q3 2024, some 8¾ years after the adoption of the current Local Plan, which is not in keeping with the NPPF. Paragraph 33 of the NPPF states the following (emphasis added):</p> <p><i>"Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future."</i></p> <p>The above makes clear that policies concerning the amount of housing in Test Valley require not just <u>review</u>, but <u>updating</u>, and urgently, since there is a high likelihood of the housing requirement being increased under future changes to the Standard Method. TVBC should accelerate production of the Local Plan and positively consider a compressed timetable of consultation in order to achieve submission within 2 years and not 3.</p>
Paragraphs 4.4, 4.5, 4.7	<p>Echoing our comments above, we believe the priority should be to bring forward a sound plan promptly, to replace the existing Local Plan, and ensure a suitable approach for the next 15 years as required by the NPPF. There is a great urgency to undertake the update, which should not be distracted by debates over what the plan's precise end date. TVBC should accelerate production of the Local Plan. It will be possible, within the next 2 years, to produce a sound plan for the subsequent 15 year period ensuring a continued supply of housing and economic development, and to frame this around wider strategic considerations in the longer term.</p>
Paragraphs 5.3, 5.4	<p>It is encouraging that TVBC has signalled that it will follow the Standard Methodology, which factors in local population forecasts and affordability, meaning that in areas of high house prices relative to</p>

	<p>incomes, more homes need to be built. Test Valley deserves recognition for having performed well in this respect compared with most authority areas in England.</p> <p>TVBC will be aware that the government is currently consulting on an update to the Standard Methodology, and indications are that this may produce a somewhat higher figure for TVBC: both Lichfields and Turley have recently calculated the figure to be 813 units per annum.</p> <p>We would urge that TVBC does not now waver over the merits of the Standard Method following this change. It would be far preferable to proceed with the current Local Plan using the updated methodology, and to fine-tune as new legislation is brought in, rather than attempting to develop a bespoke approach for TVBC – which the “Planning for the Future” paper suggests will not be possible in any event.</p> <p>In summary, TVBC should be preparing on the basis of delivering in the region of 800 dwellings per annum in the Local Plan review.</p>
Question 1	<p>We support the continued use of two Housing Market Areas in Test Valley as this is the best fit for the settlement pattern and economic geography of the Borough, with Andover being on the A303 corridor and Romsey/Chandlers Ford / North Baddesley relating to the M27 and urban south Hampshire. A single HMA would confuse this, and conversely, the introduction of extra HMAs for rural areas would fail to recognise the key importance of the main towns as centres of services, facilities and employment.</p>
Question 2	<p>HMA boundaries should factor in cross-boundary commuting flows and the availability of services in other towns and cities, and targets for housing development should recognise these realities. This is particularly important in Test Valley, where all the main settlements in Test Valley are close to the Borough’s boundaries (with the exception of Stockbridge which is highly constrained). This reinforces that the most appropriate strategy will be to continue allocating the vast majority of new development at these larger settlements.</p>
Question 3	<p>Parish-based HMAs would be inappropriate, and would be impracticable for monitoring and cause unnecessary confusion/overlap with work at the Neighbourhood Plan level.</p>
Question 4	<p>Extra tiers in the Settlement Hierarchy are not a positive way forward. The current approach is suitable, recognising the Major Centres and Key Service Centres as distinct from rural villages. Further levels in the hierarchy would cause confusion and there are opportunities through Neighbourhood Plans for villages to define how they would like to evolve on a case-by-case basis.</p>
Question 5	<p>The process of assigning settlements to tiers in the hierarchy should be similar to before, through a detailed understanding of population, services, facilities, and employment and how the places function and are capable of evolving and growing over time. This will result in the long-established (and sound) approach of growth being focussed at the main settlements.</p>
Question 6	<p>TVBC should avoid considering groups of smaller settlements together, as there is a high risk that this could cause confusion and controversy in relation to Neighbourhood Plans which more typically relate to individual villages. Instead, growth should remain focussed at the main settlements.</p>
Question 7	<p>There will always be an inner ‘ring’ of smaller villages around larger towns, which have a closer relationship with them than villages further away. However this does not necessarily imply a different function for those ‘inner’ villages; the starting point should remain in focussing growth at the larger settlements themselves.</p>
Question 8	<p>Yes, it would be sensible to include allocated sites within Settlement Boundaries. This would help avoid situations where long-established residential areas remain (in policy terms) open countryside. Where this happens, later amendments can trigger disproportionate and unnecessary processes, on account of there technically being a departure from policy even though the principle of development is firmly established.</p>

Question 9 and Question 10	Because the underlying aim of Settlement Boundaries is to define urban from countryside and control development in the latter, they should include all built and allocated development which is functionally connected with the settlement, plus features around the edge which are not (in functional or character terms) countryside. Hence this might include public open space, leisure facilities, large industrial or storage buildings and employment-generating uses. TVBC should also consider including areas that are already substantially encircled by urban form, to the point they are functionally disconnected from open countryside.
Question 11	Whether a Settlement Boundary should be tight or loose should be on a case-by-case basis given that everywhere is different. We would point out though that very often, larger settlements tend to have a 'transitional' zone around their edges, where there may be more opportunities for sensitive growth without impacting on "true" open countryside, compared with smaller (and generally more sensitive and historic) villages.
Question 12	As noted above it would be sensible to draw Settlement Boundaries in such a way as to facilitate further 'infill' particularly areas already detached from true countryside.

What happens next?

All valid responses will be acknowledged and you will be given a reference number. Please quote this number when contacting the Council about the next Local Plan. If you have an agent acting on your behalf, correspondence will be sent to your agent.

All response received will be taken into account as part of the preparation of the next Local Plan.

