

**Representations in respect of the Test Valley
Next Local Plan: Refined Issues and Options
Consultation 2020**
Submitted on behalf of the Trustees of the
Barker Mill Estates

August 2020

Turley

Contents

1.	Representation	3
2.	Introduction	5
3.	Response to Consultation Questions	6
4.	Land at the Upton Triangle, Nursling	13
5.	Land at Nursling Street, Nursling	18
6.	Land at Paulet Lacave Avenue, Nursling	21

1. Representation

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*	
----------------	--

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:

--

2. Introduction

- 2.1 We are pleased to have this opportunity to comment on the Test Valley Next Local Plan: Refined Issues and Options Consultation Document (referred to hereafter as the 'Consultation Document').
- 2.2 Turley is acting on behalf of the Trustees of the Barker Mill Estates ('client') who are promoting three site opportunities at the Upton Triangle, Paulet Lacave Avenue and Nursling Street, Nursling for residential development.
- 2.3 Our response relates to those matters of relevance to our client's interests and respond specifically to the questions that the consultation document sets out (in Section 3).
- 2.4 The representations also include comments in relation to the three specific development opportunities that the Client is promoting (in Sections 4-6).

3. Response to Local Plan Questions

Plan Period

- 3.1 Section 4 of the document discusses the issues and options with regard to the potential end date of the Plan. Whilst an end date of 2036 was previously suggested at Issues and Options stage, in our view this should be extended to 2041.
- 3.2 As the Council correctly note, paragraph 22 of the NPPF requires that the strategic policies within the local plan should cover a minimum period of 15 years from the point at which the plan is adopted. The Council's current LDS suggests the potential adoption of the Plan in the latter part of 2024, though experience suggests that these timescales could slip and the process take longer (particularly in the face of major reform proposals from Central Government).
- 3.3 Consequently, given the uncertainty over how long the plan will take to be prepared and examined we would suggest that the Council builds in some flexibility and plans for a period beyond this minimum in order to ensure it is achieved. We would suggest as a minimum the Council plans for at least an 18-year plan period from the point at which the Council fixes its evidence on housing needs using the standard method (i.e. Regulation 19 stage). This stage is expected to be reached in late 2022 / early 2023 and as such, we would suggest an end date for the Plan of 2041 will be necessary.
- 3.4 The reason for this recommendation is that the standard method effectively creates the starting point in any plan as it uses the current year as the start of the base period for the calculation of the local housing needs assessment (LHNA). This is set out in paragraph 2a-004 of the PPG which states that the first step in calculating need using the standard methodology is:
- "Taking the most recent projections, calculate the projected average annual household growth over a 10-year period (this should be 10 consecutive years, with the current year being the first year)."*
- 3.5 PPG goes on to state in paragraph 2a-008 that the LHNA can be relied upon for a period of two years from submission. Given that the standard method seeks to wrap up under, or over, delivery from previous years through the affordability adjustment it is not appropriate to include years prior to the base date for the affordability evidence used in the assessment of housing need being undertaken within the plan period. As such it would be appropriate to start the plan period from the base date of the affordability data used in the LHNA and allow for 2 years for submission, examination and adoption.
- 3.6 On this basis an 18-year plan period extending to 2041 would ensure that the plan is consistent with the minimum 15-year plan period required by the NPPF and guidance on local housing needs assessments in the PPG. It would also mean that the Plan is likely to be aligned with the joint Statement of Common Ground being prepared by the Partnership for South Hampshire (PUSH).

Housing Requirement

- 3.7 Section 5 of the document discusses the issues in relation to housing and communities and correctly identifies that meeting future housing needs is one of the greatest challenges for the next Local Plan.
- 3.8 In this context, we are pleased to note that the Council's current expectation is that the housing requirement for the Plan will be based on meeting the Standard Methodology figure in full. In this regard, it is not considered that there are any exceptional circumstances which would justify an alternative approach whereby a lower amount of housing would be provided. Indeed, consideration should be given to the ability to meet the needs of adjacent authorities who may not be able to meet their needs.
- 3.9 We would agree that the application of the current Standard Method results in a local housing need assessment (LHNA) of 550 dpa. However, the NPPF recognises this figure is a minimum and outlines in Planning Practice Guidance that there will be circumstances where local planning authorities may need to plan beyond this minimum. One scenario is where the housing needs of a neighbouring area cannot be met. In particular the Council should engage closely with the other PUSH authorities, particularly New Forest District Council and Southampton City Council. In Southampton's case, the City's administrative boundary is tightly drawn and it may be difficult for it to meet its own needs. A proactive approach should be taken to address these issue and not be based simply on the assumption that no formal requests have been made.
- 3.10 In any event, as the Council notes the standard methodology is likely to change later this year and prior to the publication of future iterations of the Local Plan. The Government's proposals for changing the Standard Methodology have now been published for consultation and we note that on the basis of the new Standard Method being proposed, Test Valley's LHNA would increase to 813 dpa. Accordingly, it would be prudent for the Council to start considering how it would deliver this higher level of housing need and to factor this in to the consideration of sites as part of the production of the Draft Local Plan due for publication next year.

Housing Market Areas (Questions 1-3)

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?

- 3.11 The consultation document includes a number of questions relating to the definition of Housing Market Areas. When examining the use of housing market areas (HMA) in plan preparation it is important to consider the changed Government guidance with regard to the assessment of housing needs. The current Local Plan was prepared in accordance with the 2012 NPPF which

introduced HMAs as a means of considering wider cross boundary housing needs as part of the objective assessment of housing need. In the case of Test Valley, it was considered that the Borough fell into two housing market areas with the southern boundary being largely defined by the extent of the Partnership for Urban South Hampshire (now the Partnership for South Hampshire). The 2012 NPPF was clear that the needs of the HMA must be met in full and as such required Council's in the same HMA to work together in meeting those needs.

- 3.12 However, the 2019 NPPF no longer relies on HMAs for the assessment of housing needs. The main function of HMAs in the 2019 NPPF is with regard to 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. Unmet need for housing similarly is not based solely on HMAs with Councils being asked to consider this on the basis of neighbouring areas which may not necessarily align with HMAs. As a result, the Council can meet its own minimum housing needs anywhere in the District as long as that approach is considered to be sustainable and there is no need to base delivery of its own needs on HMAs.
- 3.13 Nonetheless, whilst HMA's no longer hold the same significance under the 2019 NPPF the principle of distributing growth to reflect the wider settlement and commuting patterns remains valid and key issue of housing needs and distribution across boundaries still needs to be addressed and met effectively. As such an HMA could indicate that any unmet needs that may arise from neighbouring authorities within the PUSH West area, such as Southampton, should be met as close as possible to where those needs arise and in line with commuting and migration patterns.
- 3.14 We would therefore recommend that the Council does not look to distribute housing within the District on the basis of separate HMAs (Options A and C) but on the basis of the principle of delivering sustainable patterns of development across the District with a single HMA (Option B). This would consider evidence on commuting patterns and migration used to identify HMAs but ensures the distribution of development and the spatial strategy is not constrained by using HMAs.
- 3.15 This would also have the benefit of simplifying the approach to plan making, reducing the time taken to prepare the Plan as the evidence base relating to housing and employment needs would no longer need to consider disaggregation. In terms of supply, removal of the disaggregation approach would also yield benefits in terms of greater flexibility of how the Council manages supply and reports on housing delivery both in terms of assessing five year housing land supply and also ensuring housing completions are in line with expectations set out in the Housing Delivery Test introduced through the NPPF.
- 3.16 Finally, with regard to housing distribution it will be important that the Council ensure that a wide variety of sites, both in terms of location and size, must be allocated. This will ensure that needs can be met consistently over the plan period and avoid a situation where delivery focuses on a small number of larger sites that deliver homes at the end of the plan period. The Council has recognised that the

NPPF requires them to ensure that 10% of its housing requirement is delivered on identified sites of less than 1ha. It is important to stress that these must be identified in the plan or brownfield register and not include any element of small site windfall as these by definition are not identified sites.

Question 2 - In determining HMAs how should wider relationships with settlements beyond the Borough's boundaries, be taken into account, including with Southampton, Salisbury and Winchester?

- 3.17 As noted above, we consider that the Council should not look to distribute housing within the District on the basis of separate HMAs but on the basis of the principle of delivering sustainable patterns of development across the District with a single HMA. Whilst this is the case, it is essential that the strategy takes account of key drivers within the housing market areas, including commuting patterns both within the District and to key settlements in neighbouring authorities such as Winchester, Salisbury and Southampton. In this regard the role and importance of Southampton as a key centre should be recognised, including the role that Nursling and Rownhams play in that settlement context. This would suggest a focus on delivery in the southern part of the Borough.

Question 3 - Should an alternative approach to using parish boundaries be used for HMAs? If so, would this easily be identifiable and practical for monitoring purposes?

- 3.18 As noted above, we consider that the Council should not look to distribute housing within the District on the basis of separate HMAs but on the basis of the principle of delivering sustainable patterns of development across the District with a single HMA.

Settlement Hierarchy

Question 4 - Should the number of steps of the settlement hierarchy be increased, for example by sub-dividing the 'rural villages' into two separate tiers?

- 3.19 There are currently 39 settlements classified as rural villages within the current Local Plan. Within this there is some variation in the size and characteristics of these villages with varying levels of services and facilities. Their ability to accept new development will also vary based on their character and existing constraints. Whilst the Council will need to review and update its evidence to enable judgements to be made, there may be merit in disaggregating this tier of the hierarchy into two levels to reflect the different ability of rural villages to support new growth. Nonetheless, in establishing a sustainable growth strategy it is considered that such settlements would only make a relatively small contribution to meeting housing needs.

Question 5 - How should we decide which settlements to include within each step of the settlement hierarchy?

- 3.20 The Council will need to review and update its previous evidence in respect of the settlement hierarchy in order to ensure that the level of services and facilities available at each settlement remains up to date. The relative sustainability of settlements will then need to be determined. Nonetheless, subject to the

comments above in respect of the rural villages it is considered that the settlement hierarchy otherwise remains logical and appropriate. In particular, we would support the continued inclusion of Rownhams and Nursling as a Key Service Centre capable of supporting strategic allocations.

- 3.21 When undertaking this analysis, the proximity to services that sit within Southampton should be included. This has not been done in the past and has meant that insufficient recognition has been given to the sustainable merits of sites within Nursling and Rownhams. In this regard, whilst a key service centre, in sustainable terms, the location performs as well as the major centres in many ways.

Question 6 - Should we consider groups of rural settlements together, where these are closely related to each other and/or share facilities and services?

- 3.22 Where rural settlements have a close functional relationship and genuinely serve other nearby settlements or share facilities with others there may be merit in grouping these into functional clusters where this would support the development of sustainable rural communities. The Council would need to provide evidence to clearly justify any such approach as part of their settlement hierarchy.

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?

- 3.23 In seeking to establish sustainable patterns of development it is considered important that the Council gives due regard to the proximity of settlements to other larger settlements which can provide access to a wider range of services and facilities than the settlement itself. Commuting patterns and the availability of public transport services and connections also need to be considered in this context. This is particularly important in the south of the District where the influence of neighbouring Southampton is significant.
- 3.24 In this regard, we would stress that this enhances the sustainability of Rownhams and Nursling for instance. Whilst the villages themselves have a good range of services and facilities, the proximity of the settlements to neighbouring Southampton and the availability of good public transport links means that residents can easily access a wide range of services, facilities and employment opportunities by means other than the car. This has not been properly recognised in the past due to assessment work that only references facilities within the Borough boundary.

Settlement Boundaries (Questions 8-12)

Question 8 - In updating the settlement boundaries to reflect recent development which has been built and development with planning permission, should we also include new allocations?

- 3.25 We consider that any settlement boundary should reflect any recent developments and any development with planning permission. In addition, it will be important that the boundary reflects any allocations made in the new local plan.

Question 9 - How should we define settlement boundaries? What types of land uses should be included, such as public open space?

- 3.26 Settlement boundaries should give recognition to clear changes in character from urban to rural. They should focus on clearly definable features and not be drawn too tightly. As an example, there are sites, such as Paulet Lacave Avenue (see Section 6.0), where the settlement boundary should logically follow the line of the M27 rather than being drawn hard up against less definable features.

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?

- 3.27 Boundaries should follow the outer edges of curtilages. When drawn more tightly, it is create unnecessary anomaly's and is often driven by a desire to create an absolute development management constraint. This is not the purpose of the settlement boundary, which should be focussed on the outer edges of the settlement itself and run on the outside boundaries of any curtilages that contain urban or semi urban form (such as houses and commercial properties).

Question 11 - Should settlement boundaries be drawn more tightly or more loosely, perhaps reflecting which tier the settlement is within the settlement hierarchy?

- 3.28 The same principles should apply across all settlements. The desire to draw more tightly for smaller settlements is simply driven by a wish for a blanket development management control. This is not the purpose of the policy.

Question 12 - Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment?

- 3.29 In defining the settlement boundary we would suggest that the Council looks at a looser boundary, defining them on physical features which extend beyond the curtilage of buildings and include any elements of open space associated with that settlement. Such an approach may offer opportunities, especially in smaller settlements, for further development to support smaller developers as well as potentially delivering land to support those wanting to build their own home.
- 3.30 If the Council decide to maintain a tighter boundary to settlements, we recommend that a policy is included to provide some flexibility for development on the edge of settlements. This approach allows the Council to take a more flexible approach that is proportionate to the size and nature of the settlement without compromising the integrity of the Council's spatial strategy and settlement hierarchy. In particular such an approach will better support the Council maintaining the vibrancy and vitality of its rural communities by delivering both market and affordable homes to meet the needs of such areas.

Self and Custom Build Housing (Questions 13-14)

Question 13 - Should we have a specific policy for self-build homes?

- 3.31 We support the provision of a specific policy for self-build homes setting out the Council's approach to such development. It is considered that this would be

beneficial in encouraging such provision and ensuring that the Council's approach to this specialist form of housing is clear. However, in developing such a policy it is important that the Council carefully consider its approach to supporting those who wish to build their own homes.

Question 14 - Should we have a policy for large housing sites to include a proportion of serviced plots to be made available for sale to those seeking to build their own homes?

- 3.32 Whilst we acknowledge it is important for local plans to provide support within policy to self and custom build housing, we do not consider that such policies should seek a proportion of large sites to provide plots for such homes. Firstly, the PPG is clear that when seeking to meet the demand for self-build plots Council's should engage with landowners to identify suitable sites for self and custom build housing. Requiring all large sites to provide plots takes no account of whether such sites are suitable or will provide the type of plots required by self-builders nor does it seek to engage landowners in the process. As such we consider blanket policies to be inconsistent with national policy. We would suggest that the more appropriate approach, and one that is consistent with national policy, is for the Council to be proactive in identifying suitable sites, including the Council's own land, that would be suitable for self-build plots and then engage with landowners with regard to their allocation for such development. Importantly such an approach may identify additional sites and as such provide a greater variety of development opportunity rather than just deliver a unit on a larger site in a different way.
- 3.33 Secondly the Council will need to ensure that its evidence is robust. Whilst the PPG recognises that the Self Build register will be a key piece of evidence in estimating the need for self-build plots it also notes that consideration will need to be given to the robustness of this data and what alternative sources of evidence is available. In addition, we are concerned that such registers are rarely revisited by local authorities and as such may not provide an accurate assessment of the demand for self-build homes. When a number of Councils have revisited their registers in order to confirm whether individuals wish to remain on the register, numbers have fallen significantly. This suggests that the majority of those that sign up to the registers in reality lack the commitment, time, and finances to take on a self-build project.
- 3.34 Finally, if the Council do include a requirement for self-build plots on some sites it is important that it includes a clause as to when such plots will be returned to the developer should they remain unsold. We would suggest that should plots allocated for self and custom build housing remain unsold after twelve months of marketing they should be returned to the developer to be built as market housing.