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**TEST VALLEY BOROUGH NEW LOCAL PLAN ISSUES
AND OPTIONS CONSULTATION (JUNE 2020)**

**PERSIMMON HOMES REPRESENTATIONS
STATEMENT**

August 2020

INTRODUCTION

Persimmon Homes welcomes the opportunity to comment on the New Local Plan Issues and Options consultation.

This representation should be read in conjunction with comments submitted by Persimmon as part of the previous Issues and Options consultation in 2018. These comments are attached at Appendix 1 for ease of reference.

RESPONSE TO CONSULTATION QUESTIONS

The following section addresses the questions set out in the Living in Test Valley (Housing and Communities) section of the consultation document that are considered relevant to Persimmon Homes' interests.

Question 1

The current Housing Market Area (HMA) split is based on travel to work areas derived from the 2011 Census data and reflects distinct functional economic areas and housing markets in the Borough. Disaggregation of housing requirements between the two HMAs also reflects the linear nature of the Borough, and will allow for a more appropriate distribution of housing with Test Valley. This is particularly important given the differing housing pressures experienced in each of the HMAs. For example, it would be unreasonable (and unsustainable) for housing that is needed to address growth (and any unmet need) in South Hampshire to be directed to the Northern Test Valley HMA - most likely Andover as the only major centre in this area, which is some 30-40km away. The Council has not presented any evidence suggesting a review of the HMA boundaries is necessary. As such, there is no justification for altering the current HMA boundaries, which have been through public examination previously and found to be sound.

Question 2

At the present time, the Council is obligated through the Duty to Co-operate to discuss cross boundary strategic issues with neighbouring authorities. The Statement of Common Ground(s) that the Council produces will be an important consideration when the soundness of the Plan is considered at examination.

The mechanism for such cross-boundary discussion in Southern Test Valley is well established through the Partnership for South Hampshire (PfSH). However, in Northern Test Valley the engagement process is less formalised, but this will be equally important if the Council's Duty to Co-operate is to be successfully discharged. In Persimmon's view, engagement with the more constrained authorities of Winchester, New Forest District, Wiltshire and Southampton, and to a lesser extent West Berkshire and Basingstoke, will be critical.

What is of concern is the lack of transparency in how cross boundary issues are being dealt with, particularly in the PfSH area. It is understood that un-met need in the PfSH is being addressed through a review of the Spatial Position Statement. Whilst this is a non-statutory document, it has a significant bearing on plan-making across the sub-region but is not subject to any consultation outside of individual Authorities Local Plan examinations. There is a concern that housing distribution across the PfSH sub-region will be fixed without proper scrutiny. We would urge the Council to make representations to PfSH to increase transparency in this process and formally consult stakeholders on the emerging Spatial Position Statement.

Question 3

See comments on Questions 1 and 2 above.

Question 5

As part of the Revised Local Plan (RLP), the Council developed a methodology for determining the settlement hierarchy. Given that the RLP was found sound, Persimmon sees no reason why the same methodology could not be used to inform the current Plan review.



Question 8

Yes – new allocations should be included within the settlement boundaries. The Council undertakes significant work to identify new allocations to include in the Local Plan. Settlement Boundaries, much like allocations, effectively confirm that the principle of development is generally acceptable (subject to consideration of detailed matters). If an allocation for development remains outside of the settlement boundary and within Countryside (where development is restricted), this creates an unnecessary and confusing internal contradiction between the policies within the Plan. This is also contrary to the zoning approach set out in the recently published Housing White Paper, which proposes a clear distinction between areas of growth and areas of restraint. Persimmon Homes cannot see any benefit / justification for new allocations not to be included within settlement boundaries, unless there is a genuine need for such an allocation to have a countryside location outside of the COM2 boundary.

Question 9

Settlement boundaries should include existing development that form part of an existing settlement include the curtilage of housing and employment sites. Open space that is clearly associated with the settlement or particular development should also be included. Open space protection policies will ensure that such land remains undeveloped. As part of the review of settlement boundaries, the Council should look to address any anomalies, including those that may have emerged as a result of new development and new allocations made since the boundaries were last reviewed. In this context, it is considered that the area around Andover Down, which is functionally and physically related to Andover and the Picket Twenty site should be redrawn. The Plan provided at Appendix 2 to this Statement, shows how the settlement boundary in this area should logically be redrawn.

Furthermore, given the significant housing pressures facing TVBC, the Council needs to consider the quality of areas currently designated as countryside. In order to do this in a manner which is evidence based, the Council should undertake a qualitative assessment of the current settlement boundaries based on landscape features and the capacity for development to be accommodated without causing unacceptable harm. Preference should be given to utilising those areas which are identified as scoring poorly in terms of their contribution to the landscape value of certain areas or boundaries to the settlements. The Council should explore opportunities to strengthen the significance of some landscapes and boundaries through the allocation of sites with accompanying strategic landscaping.

Question 13

Without understanding the scope and detail of any self-build policy, or the need for self-build housing in the Borough, Persimmon cannot support a policy on this issue. To provide an informed response to this question it will be necessary for the Council to publish an anonymised version of its register and undertake an analysis of whether those included on the register are genuinely in a position undertake a self-built project. At the current time, the only requirement to be included on the Test Valley Self Build register is confirmation that the individual/group is over 18 years of age and is of eligible nationality. There is no assessment of whether an individual/group has the means (including financially) to undertake such a project. It is also noted that there is no mechanism for removal of an individual/group from the register. It may be that some entries on the register are simply inquisitive, but their inclusion on the register creates an artificially inflated perception of need for this type of housing.

Question 14

The Company objects to any form of policy which requires a proportion of self-build homes to be delivered on larger sites as this has the potential to undermine the coherence of the design of a development proposals. The Council should instead focus on identifying and allocating sites specifically for self-build housing, or include a policy that will allow self-build housing to be delivered on appropriate sites within and outside of the settlement boundaries – perhaps in a similar way to rural exception sites.

Furthermore, it is not appropriate to provide self-build plots on new large suite because this has impacts on:

- Phasing and completion of the wider site.
- Section 106 contributions due to the exemption that applies to self-build housing.
- Delivery of housing where supply on an ad hoc basis by self-builders is likely to be slow compared with the remainder of the site or even not take place at all.

This results in practical and development management problems as follows:

- The reserve matters period running out and needing to be extended.
- Ad-hoc builders turning up outside specified hours of work.
- Storage of materials as there is limited room on plot and storage spills onto the market housing part of the site.
- Purchasers having to stop building due to unforeseen circumstances.
- Purchaser dissatisfaction where building continues on a site which was expected to finish when they moved in.

Other Local Plan Issues

The questions posed in the Consultation Document focus on issues associated with living and working in Test Valley but the Document also touches on environmental issues and the delivery of physical, social and green infrastructure.

The following section, sets out Persimmon's initial comments on issues that were not been addressed in its previous representations. However, it may be necessary for further comments to be made as and when the Council's approach to these issues is better defined.

In respect of biodiversity it is noted that the Document does not set out how the emerging Plan will deal with nutrient impacts on protected ecological sites. This is a key issue for many development proposals in Hampshire (and the wider region). As such, the Council should note that the sites being promoted by Persimmon are capable of mitigating adverse impacts on protected ecological sites due to increased nutrients.

Local Housing Need

The Council will no doubt be aware of the recent Government consultation on changes to the Standard Methodology for determining Local Housing Need (LHN). If Government's proposal is carried forward in its current form, the Council's LHN increases by 54% to 813dpa when compared with the current Standard Methodology figures. Given the current Local Plan timetable, and taking into account the proposed transitional arrangements set out in the Government consultation, it is likely that the Council will need to use the higher LHN figure as the starting point for housing requirement policies in the emerging Local Plan.

Increasing housing pressures in the Borough, alongside an extended plan period, indicate that the Council will need to identify new greenfield sites to meet housing requirements (including any unmet need and taking into account economic growth). As such, Persimmon



submits the following logical and sustainable housing sites for allocation in the emerging Local Plan:

- Packridge Farm, North Baddesley
- Land at the Middleway, Andover
- Land south of Forest Land, Andover
- Picket Twenty 'Rice Land', Andover
- Picket Twenty 'Extension Site'

Detail regarding the deliverability of the above sites are set out in supporting information submitted with these representations.