

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:

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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
	Please see attached representations.

Please use next page if necessary

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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.



Test Valley Next Local Plan
Refined Issues and Options Consultation 2020
Representations on behalf of Taylor Wimpey Strategic Land

Boyer

Prepared on behalf of Taylor Wimpey Strategic Land | August 2020

Report Control

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1. INTRODUCTION

- 1.1 On behalf of our client, Taylor Wimpey Strategic Land, Boyer is instructed to submit representations in response to the public consultation on the Test Valley Borough Council (TVBC) Next Local Plan Refined Issues and Options document.
- 1.2 The current consultation is the second stage in the preparation of the Next Local Plan for Test Valley and as such it does not seek to address specific issues such as the overall scale of development, the precise spatial distribution of future growth or the suitability of sites.
- 1.3 Representations have been previously submitted to the initial Issues and Options Consultation, which included a Development Framework Document (DFD) prepared in relation to land at Finkley Down Farm, which is considered suitable to deliver a logical and sustainable development opportunity for consideration in the ongoing preparation of the Next Local Plan.
- 1.4 Our comments are set out in response to specific questions for ease of reference. These representations do not seek to replicate in-depth any detailed comments that were previously submitted to the Local Plan Issues and Options Consultation, which remain valid and on public record. Instead, these additional representations address those new matters raised within the Refined Issues and Options Consultation Document.
- 1.5 Notwithstanding this, the Finkley Down Farm DFD is herewith resubmitted for completeness (Appendix 1). The DFD has been prepared as a live document and will be updated as the Local Plan Review progresses. It summarises the up-to-date baseline conditions, referencing specific studies and reports. The full suite of technical baseline information can be made available upon request.

2. NEXT LOCAL PLAN HOUSING REQUIREMENT

- 2.1 Although the Refined Issues and Options Consultation Document does not pose any specific questions in relation to the Next Local Plan housing requirement, which is indicated as likely comprising the result of the previous standard methodology, due to the significance of identifying a robustly justifiable housing requirement during the new Local Plan period, comments are made in this respect, below.

'Planning for the future' (August 2020) and revised Standard Method for assessing Housing Need Public Consultation

- 2.2 The UK Government is currently consulting upon the 'Planning for the future' White Paper (August 2020), which seeks to boost housing delivery in England in line with the national target of delivering 300,000 new homes annually. Alongside this consultation, the Government is also consulting upon proposed changes to the standard method for calculating local housing requirements using a revised formula that would be applied in a consistent manner.
- 2.3 The proposed 'new standard method' comprises a two-stage process, which includes first establishing the appropriate baseline for the Local Authority, 'following by an adjustment factor' to help respond to changes in affordability based on the latest assessment of affordability, in addition to how affordability has changed over time.

Step 1 – Setting the Baseline

- 2.4 The proposals state the baseline for the new standard method should be *whichever is the higher* figure of either 0.5% of the existing housing stock *or* the latest projected annual household growth over a ten-year period.
- 2.5 With respect to Test Valley, as of 31st March 2019, the existing housing stock within the District stood at 55,266 dwellings¹. A figure of 0.5% of this equates to **276.33 dwellings**. Conversely, the latest national household growth projections suggest that the number of households within Test Valley would increase from 52,432 in 2020 to 56,938 by 2030². This equates to an average annual growth in the number of households over the next ten years of **450.6**.
- 2.6 In the case of Test Valley, the average annual growth of households over the next ten years would therefore form the baseline for the baseline for assessing housing need under the new standard method.

Step 2 – Adjusting for Market Signals

- 2.7 In calculating adjustments to the baseline in order to account for market signals, the Government proposes that an adjustment factor be used, which would be based in the first instance upon the latest local affordability ratio for the district (based on average workplace earnings and average house price), followed by how this ratio has changed over the past 10 years.

¹ MHCLG 2019, Live Table 125: dwelling stock estimates by local authority district, 2001-2019

² ONS 2018-based household projections, Live Table 406: Household projections by district, England, 1991-2039

- 2.8 In this regard, the local affordability ratio for Test Valley in 2019 stood at **9.95**³. This has changed from 8.22 in 2009, that is, an increase of **1.73** over the last 10 years.
- 2.9 In order to determine the corresponding adjustment factor, the formula proposed by the new standard method would increase the baseline by a quarter of a percent for every 1% the local affordability ratio is above 4.00. Finally, the change in affordability over the previous ten years is multiplied by a factor of 0.25. The final adjustment factor is a combination of these two parts.
- 2.10 Utilising the above, the adjustment factor to account for market signals is calculated as **1.804375**. Consequently, multiplying the baseline (450.6) by this adjustment factor yields a housing requirement of **813 dwellings per annum**. This compares to the existing Local Plan housing requirement of 588 dwellings per annum and the current standard method calculation of 550 dwellings per annum.

Final Housing Requirement and Implications for Next Local Plan

- 2.11 The results of the revised Standard Method set out above is clearly a significant uplift of almost **50%** on the current standard method and, in line with the requirements of the NPPF, which states that strategic policies should look ahead over a minimum 15-year period from adoption⁴, indicates that the Next Local Plan will have to identify sufficient land to deliver a *minimum* of an additional **3,945 dwellings** over that currently envisaged.
- 2.12 However, the Consultation Document makes clear that is the *starting point* and not the final housing requirement, which would include a number of 'policy-on' considerations, including the need to incorporate a suitable buffer to ensure flexibility in the market for land and also take into account future changes to national planning policy.
- 2.13 In this regard, the Government consultation on the revised Standard Method makes it clear that a central aim of Local Plan-making should to ensure that sufficient land is identified so that "...*the market is not prevented from delivering the homes that are needed...*" and to stop land supply being a barrier to enough homes being built in order to prevent the national under-delivery of housing in the past⁵.
- 2.14 From the above, it is clear that the Next Local Plan housing requirement will be significantly in excess of what TVBC currently envisage and it is likely that this requirement could increase further still. The standard method should therefore not be applied as a cap or constraint on growth in excess of such requirements, particularly where such opportunities for growth would be consistent with wider objectives to be established within the Next Local Plan.

³ ONS, Table 5c, Ratio of median house prices to median gross annual workplace-based earnings by local authority district, England and Wales, 1997-2019

⁴ NPPF, Para. 22 (February 2019)

⁵ MHCLG, Para. 9, Changes to the current planning system (August 2020)

3. QUESTIONS 1, 2 AND 3

Q1: Should (a) we retain 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?

3.1 The current Housing Market Area (HMA) is consistent with the evidence base prepared in support of the adopted Local Plan, principally the Strategic Housing Market Assessment (SHMA). As the latest SHMA dates from 2013, this is significantly out-of-date and should be updated to ensure that the New Local Plan is sufficiently justified by the evidence base, which considers the most up-to-date information on the functional relationships between settlements in Test Valley. This will also help ensure that any local or specific affordability issues, which would need to be considered as part of the Government's revised Standard Method, are appropriately addressed.

3.2 Notwithstanding the findings of an up-to-date SHMA and without prejudice to our ability to make future comments on subsequent evidence, it is considered that a single HMA for the whole of Test Valley would simplify both the plan-making and decision-making processes whilst allowing sites across the entirety of the Borough to contribute to Test Valley's housing need. This would need to be robustly justified however, to align with evidence in an updated SHMA.

Q2: In determining HMAs how should wider relationships with settlements beyond the Borough's boundaries be taken into account, including with Southampton, Salisbury and Winchester?

3.3 Should the SHMA identify strong, functional relationships between settlements beyond the Test Valley boundaries, the benefits of cross-boundary co-operation to addressing housing need and achieving sustainable development need to be explored under the statutory Duty to Co-operate set out in the Section 33A of the Planning and Compulsory Purchase Act 2004. This makes the publication of an up-to-date SHMA crucial to the Local Plan preparation process.

Q3: 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?

3.4 This is not felt to be necessary as at present there is no reason to seek an alternative approach. However, if evidence were to be seen which would suggest otherwise, then this would have to be considered.

4. QUESTIONS 4, 5, 6 AND 7

Q4: Should the number of steps of the settlement hierarchy be increased, for example by subdividing the 'rural villages' into two separate tiers?

- 4.1 Any changes to the existing settlement hierarchy must be justified by evidence and should be implemented in the interests of achieving sustainable development.

Q5: How should we decide which settlements to include within each step of the settlement hierarchy?

- 4.2 The spatial distribution of development in the current Local Plan is guided by a settlement hierarchy split divided into 4 tiers, which identifies the most sustainable towns and villages, based on their provision of facilities and ease of accessibility to these services.
- 4.3 Andover and Romsey are identified in the settlement hierarchy as 'major centres' as they have the widest range of facilities, which is reflected in the scale of growth currently being built and that which is proposed at each settlement as a component of the overall housing requirement.
- 4.4 As set out in Section 2 of these representations, the proposed new Standard Method identifies a local housing requirement of 724 dwellings. It is crucial that this figure also constitutes a minimum starting point for the number of houses required in Test Valley and thus striving for continuous growth within the Borough.
- 4.5 Ultimately, as the largest settlement with the greatest number of existing services, Andover remains the most sustainable settlement in the northern Test Valley Area and therefore should continue to be the focal point for additional growth through the Local Plan Review. It has been specifically noted in the Refined Issues and Options Consultation paragraph 5.17 that Andover holds the widest range and number of facilities.
- 4.6 Paragraph 70 of the NPPF iterates that the supply of large numbers of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing towns or villages. In this context, given the role and function of Andover as the Borough's main settlement and its capacity to accommodate growth at the strategic scale, it is considered that the New Local Plan spatial distribution strategy should have, at its heart, an emphasis on new strategic allocations at Andover.
- 4.7 By keeping the most sustainable towns and villages at the top of the hierarchy, this will ensure that the Local Plan actively manages growth patterns by focusing on significant development at those locations which are presently sustainable or have the potential to be made sustainable. This will further build upon opportunities to limit vehicular travel and offer genuine choice of transport modes to access services and facilities.

- 4.8 It is also important to note that the changes proposed to the planning system as part of the Government's 'Planning for the future' public consultation include, as part of the assessment of the existing baseline, a consideration for the existing dwelling stock, so that development is targeted at areas that can absorb new housing. Therefore, the indication from the consultation is that focussing new development at the larger, existing settlements will remain a critical component of housing supply within national planning policy going forward.

Q6: Should we consider groups of rural settlements together, where these are closely related to each other and/or share facilities and services?

- 4.9 See response to Q7.

Q7: How should we treat rural settlements which are close to other larger settlements and can therefore also easily access their facilities and services?

- 4.10 Attention must be drawn to Paragraph 149 of the NPPF which iterates how plans should take a proactive approach to mitigating and adapting to climate change. By simply allocating sites in smaller, rural settlements without necessary services and facilities, the inevitable reliance on the private car will arise to reach these services and facilities. Not only will this lead to increased carbon emissions but will also require an improvement to infrastructure at these smaller, rural settlements.
- 4.11 Due to potential impacts on the character of these rural settlements should development be of a scale too great to their existing size, it is considered that additional allocations at larger settlements themselves would be more appropriate.

5. QUESTIONS 8 AND 9

Q8: In updating the settlement boundaries to reflect recent development which has been built and development with planning permission, should we also include new allocations?

- 5.1 If such strict interpretations of settlement boundaries are to be used then new allocations should be included within these boundaries to aide in providing clarity and certainty on the location of future development in Test Valley. Please also see response to Question 9.

Q9: How should we define settlement boundaries? What types of land uses should be included, such as public open space?

- 5.2 Settlement boundaries delineate in plan form established built up areas within which future development, in principle, will be permitted. To ensure that settlements are not defined by these boundaries, which are often arbitrary in nature, a flexible approach should be taken. The function of such strict, arbitrary boundaries is to control development as those areas recognised as countryside, where new development is controlled.
- 5.3 While the focus for settlement boundaries should still remain on protecting the countryside from sporadic development, it must be flexible enough to be able to utilise them as a mechanism to securing sustainable development.
- 5.4 To correlate with their purpose of securing sustainable development, settlement boundaries should be defined and delineated as those areas where development would most help contribute towards achieving sustainable development. This would be best achieved by a less rigid approach which allows flexibility in determining locations for future growth. This would ensure that future development would not be restricted by arbitrary spatial policy designations.
- 5.5 As part of the Government's changes to the planning system proposed by the 'Planning for the future' White Paper, one of the proposals is to designate land within Local Plans as areas for 'growth', 'renewal' or 'protection'. As part of this, it is proposed that land that is within an area identified for growth could benefit from 'permission in principle', that is, outline planning consent would effectively be conferred by a site's allocation within a Local Plan.
- 5.6 Consequently, a number of strategic policy matters envisaged to be dealt with by the Next Local Plan, such as settlement boundaries, could potentially be rendered redundant or, at the least, significantly vitiated by the proposed changes within the White Paper. Further consideration should therefore be given towards the continued efficacy of settlement boundaries within the emerging national planning context.

6. QUESTIONS 13, 14, 15 AND 16

Q13: Should we have a specific policy for self-build homes?

- 6.1 The Self Build and Custom Housebuilding Act 2015 places a duty on Councils to keep a register of individuals and groups who are seeking to bring forward a self-build project. This register is intended to establish the demand for such plots within Test Valley.
- 6.2 A future policy that encourages the provision of self-build plots, rather than impose a potentially burdensome requirement, subject to the site specific circumstances would provide a more pragmatic and responsive policy framework within which appropriate self-build plots can be brought forward. This would be consistent with Planning Practice Guidance (Paragraph: 025 Reference ID: 57-025-201760728)
- 6.3 The type of plots that are of interest should be specified in the Register, in order to understand the type / location of plots sought. It should be recognised that there is a significant difference between those who may wish to build their own home on a standalone plot on the edge of a rural settlement and a plot that forms part of a larger residential development. It is therefore essential that any future policy requirement is consistent with the evidence base and does not impose policy burdens that are not supported by appropriate evidence.

Q14: Should we have a policy for large housing sites to include a proportion of services plots to be made available for sale to those seeking to build their own homes?

- 6.4 As discussed above, the implications of imposing specific requirements for self-build plots as part of a larger development should also be assessed in terms of the potential impact on the overall viability, deliverability and place-shaping agenda. This is of particular relevance to future strategic allocations, as sites which will be critical to the overarching objectives to be set out in the New Local Plan. It is therefore considered that, while provision can be made in the Local Plan for self-build, it should not be imposed on applicants.

Q15: Should self-build housing to be [sic] delivered as part of community led development?

- 6.5 See Question 13.

Q16: Could the introduction of a self-build housing policy also be an opportunity for the Council to tackle the issue of climate change?

- 6.6 There is no evidence that has been provided to suggest that self-build housing would necessarily be built to a higher-standard in terms of carbon emissions or energy efficiency than those built by national developers. Given the ongoing consultation on changes to national planning policy, which will consider among other issues, including the need to balance the delivery of new homes, the viability of new development and the need to tackle climate change, it is felt that local policies should not seek to impose requirements over and above that required by Building Regulations. It would therefore be prudent to await further changes to planning policy at a national level before imposing additional local policies in respect climate change.

**APPENDIX 1: FINKLEY DOWN FARM
DEVELOPMENT FRAMEWORK DOCUMENT (DFD)**