

10182

# Representations to the Test Valley Local Plan Refined Issues and Options



Land at Grove, Romsey

## 2. Refined Issues and Options

2.1. The comments on the questions posed within the Refined Issues and Options consultation are set out below.

**Q1: 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 areas?**

2.2. Test Valley, due to its administrative boundaries, has two clear centres: Andover in the north, and Romsey in the south, and these two locations combined are where approximately 46% of the population of the Borough is concentrated.

2.3. Andover has a high degree of self-containment, and the adopted Local Plan states that 70% of the residents living in the town also work there. Southern Test Valley, however, is less self-contained due to its strong relationship with South Hampshire and its good transport links, meaning it experiences much more in-and out commuting for both employment and other facilities, such as leisure and retail.

2.4. The Planning Practice Guidance (PPG) states that three different sources should be considered when identifying housing market areas (HMAs), namely:

- House prices and rates of change in house prices
- Household migration and search patterns
- Contextual data including Travel to Work areas, retail and school catchment area

2.5. Given these distinct characteristics, the north/south split of the Borough should be continued in the new Local Plan, reflecting both areas and the importance of the sub-regional and cross-boundary relationships that the Borough currently has. It is also noted in paragraph 5.12 of the Refined Issues and Options document that *"the majority of responses to the 'Issues and Options' consultation supported separate HMAs being maintained..."*

2.6. However, development in the south of the Borough has been predominantly focussed on Romsey, which has seen significant and planned growth over recent plan periods, more recently through the New Neighbourhood at Whitenap, which allocates approximately 1,300 dwellings together with a range of facilities (Adopted Policy COM3). This is acknowledged in paragraph 5.18, which states:

*"These communities have been a significant focus of development in the current adopted Local Plan."*

# Representations to the Test Valley Local Plan Refined Issues and Options

Land at Grove, Romsey

---



NPPF, and the objectives of TVBC that can be seen within the Refined Issues and Options Consultation document. Alternatively, the Site can be delivered through individual parcels as a phased development and the single landownership allows for this flexibility. A first phase could potentially come forward on the discrete piece of land adjacent to Nursling, bounded by the M27, M271 and the A3057.

# Representations to the Test Valley Local Plan Refined Issues and Options



## Land at Grove, Romsey

- 2.7. It is recognised that there is pressure in Southern Test Valley to retain the gaps around settlements, such as North Baddesley, which plays an important role in helping to define their character and in shaping the settlement pattern of the area. This is likely to influence the future distribution of development in the south of the Borough.
- 2.8. Additionally, development in the south of the Borough should focus on links with surrounding settlements, particularly Southampton, and existing movement patterns.
- 2.9. The Issues and Options consultation stated *"a HMA is a geographical area within which most people tend to both live and work, without the need to commute further afield"* (Paragraph 5.6). Based on this definition, as well as the contextual data recommended by the PPG, then Travel to Work Areas (TTWAs) are a suitable method to identifying HMAs, as these define approximate self-contained labour market areas. These are areas where most people both live and work, therefore relatively few people cross a TTWA boundary on their way to work, and they are based on statistical analysis, rather than administrative boundaries.
- 2.10. The Office for National Statistics (ONS) has identified 228 TTWAs in the UK, of which 151 are in England. Test Valley is covered by two TTWAs: Andover and Southampton. The Southampton TTWA covers Southern Test Valley, the New Forest Authority Area and National Park, Eastleigh and Winchester.
- 2.11. Given the geography of the Borough, and the key differences between the north and south, and the identified TTWAs that separate the Borough, it is felt that the division of Test Valley into two HMAs remains the correct approach. This has been the consistent approach in previous planning policies and the currently adopted Local Plan.

**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?**

- 2.12. One of the key aspirations of the new Local Plan should be effective co-operation with neighbouring authorities. The importance of sound and evidenced co-operation has been demonstrated recently in number of failed draft Local Plans where Inspectors have found the Plan unsound, such as Sevenoaks, Uttlesford and St Albans. For the first time, the NPPF has made a clear distinction between strategic policies and local policies. Paragraph 21 states that local plans should make it clear which policies are strategic and that they should be limited to those necessary to address the strategic priorities of the area, importantly including any relevant cross-boundary issues. In order to achieve this, the NPPF states that *"strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans"* (Paragraph 25), as effective and on-going joint working between authorities is *"integral to the production of a positively prepared and justified strategy"* (Paragraph 26).
- 2.13. Paragraph 5.7 of the Refined Issues and Options document states that *"at present there is no evidence of any unmet housing need in neighbouring local authority areas which would potentially need to be considered as to how it might be addressed"*. It is understood that Southampton City Council (SCC) are being required by the Government to deliver 20,000 homes by 2040 and are heavily constrained, but it is noted that as SCC are at an early stage of their Local Plan review (completing their Issues and Options in May 2020) that evidence of any unmet housing need from Southampton is not yet known.

# Representations to the Test Valley Local Plan Refined Issues and Options

Land at Grove, Romsey



- 2.14. The Local Plan should include evidence of working closely and effectively with adjoining local planning authorities and include strategic cross boundary policies. Specifically, the importance of neighbouring Southampton should be recognised. Figure 11 of the 2018 Issues and Options Consultation showed the commuting relationships with neighbouring authorities. Unlike Winchester, which has a higher proportion of out-commuting, or Wiltshire, which has a higher proportion of in-commuting, Southampton experiences nearly a similar amount of in-commuting and out-commuting from Test Valley, at 4,674 and 4,827 people respectively. This, therefore, demonstrates a key relationship between Southampton and Test Valley. This is an important consideration and should form part of the Sustainability Appraisal, guiding the new Local Plan.
- 2.15. The NPPF therefore requires authorities to prepare and maintain one or more Statements of Common Ground. These should be used to document the cross-boundary matters that are being addressed, and how the authorities are co-operating to address these. This should be undertaken throughout the plan-making process and should be a key aspiration for the new Local Plan. Therefore, the plan is not created in an insular manner, but instead develops a sound spatial strategy and objectives which help to deliver the much needed homes and economic growth within the sub-region.

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

- 2.16. Parts of Test Valley, particularly in the south of the Borough, contain a number of individual settlements with unique characters. Local Gaps have previously been used to protect and enhance these individual characters, and it is therefore felt that they should continue to have a role within the emerging Local Plan.

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

- 2.17. The Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016), provides a legal definition of self-build and custom housebuilding but, importantly, it does not distinguish between the two. Both are where an individual or an association of individuals, build or commission the completion of houses to be occupied as homes by those individuals. As the Act does not specify a difference between the two, the Local Plan should ensure that any policies relating to Self-build plots, also refer to Custom Housebuilding, allowing flexibility for the choice of delivery of either to be determined by the market demand for such plots.
- 2.18. It is recommended that the Local Plan should reflect that there may be a need for custom and self-build plots within the Borough, however it should not specify a percentage that should be achieved on all development sites. This is due to the fact that not all development sites will be suitable for custom or self-build plots, whereas others may come forward to be entirely delivered as custom or self-build properties. Instead, it is suggested that the Local Plan should seek to negotiate the inclusion of custom or self-build plots on a case-by-case basis, taking into account factors such as the proposed development and the site.

# Representations to the Test Valley Local Plan Refined Issues and Options

Land at Grove, Romsey

---



**Q14: 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?**

- 2.19. Large housing sites have the ability and flexibility to provide housing across all tenures and delivery models as well as delivering the necessary and proportionate infrastructure and facilities required in the local area.
- 2.20. If Custom Build/Self Build forms part of a strategic development site, careful consideration needs to be given as to the delivery of the units in relation to the wider development, ensuring that the design of the Custom Build/Self Build units complement the development parcel and accord with the overarching site-wide masterplan.

# Representations to the Test Valley Local Plan Refined Issues and Options

Land at Grove, Romsey



## 3. Conclusion

- 3.1. These representations have been submitted on behalf of Crest Nicholson Plc, which is promoting a potential development located at the Site.
- 3.2. As a reminder, representations were submitted in relation to the Site at the Issues and Options stage and a series of technical reports were enclosed with the representations. The reports demonstrated that there are no technical 'showstoppers' that would prevent the land coming forward for strategic development. These latest representations should be read alongside these technical reports.
- 3.3. Crest support the north/south split of the Borough in regard to Housing Market Areas and this approach should be continued in the new Local Plan, reflecting the characteristics of both areas, and the importance of the sub-regional and cross-boundary relationships that the Borough currently has.
- 3.4. However, development in the south of the Borough has been only focussed on Romsey, which has seen significant and planned growth over recent plan periods, more recently through the New Neighbourhood at Whitenap, which allocates approximately 1,300 dwellings together with a range of facilities (Adopted Policy COM3).
- 3.5. It is recognised that there is pressure in Southern Test Valley to retain the gaps around settlements, such as North Baddesley, which plays an important role in helping to define their character and in shaping the settlement pattern of the area. This is likely to influence the future distribution of development in the south of the Borough.
- 3.6. Additionally, development in the south of the Borough should focus on links with surrounding settlements, particularly Southampton, and existing movement patterns.
- 3.7. Overall, this leads to a strategic opportunity at the Site, located close to both Southampton and Romsey, within the heart of the main movement patterns between the two centres where much needed housing could be provided, thus considerably reducing the level and nature of commuting.
- 3.8. The Ministry of Housing, Communities & Local Government has this month published their 'Planning for the Future' White Paper and is out consultation for 12 weeks. Although it is noted that the proposed planning reforms are only at a consultation stage and will take time to implement, any future plan will need to take into consideration the proposed changes to the planning system that the Government is looking to put forward.