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* (If responding on behalf of an organisation)	
If you wish your comments please provide your email	s to be acknowledged and to be kept informed of progress, address below:
Email Address*	
	address and wish your comments to be acknowledged progress, please provide your postal address.
	Postcode
If you are an agent please representing:	give the name/company/organisation you are
Personal Details and Gen	neral 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.

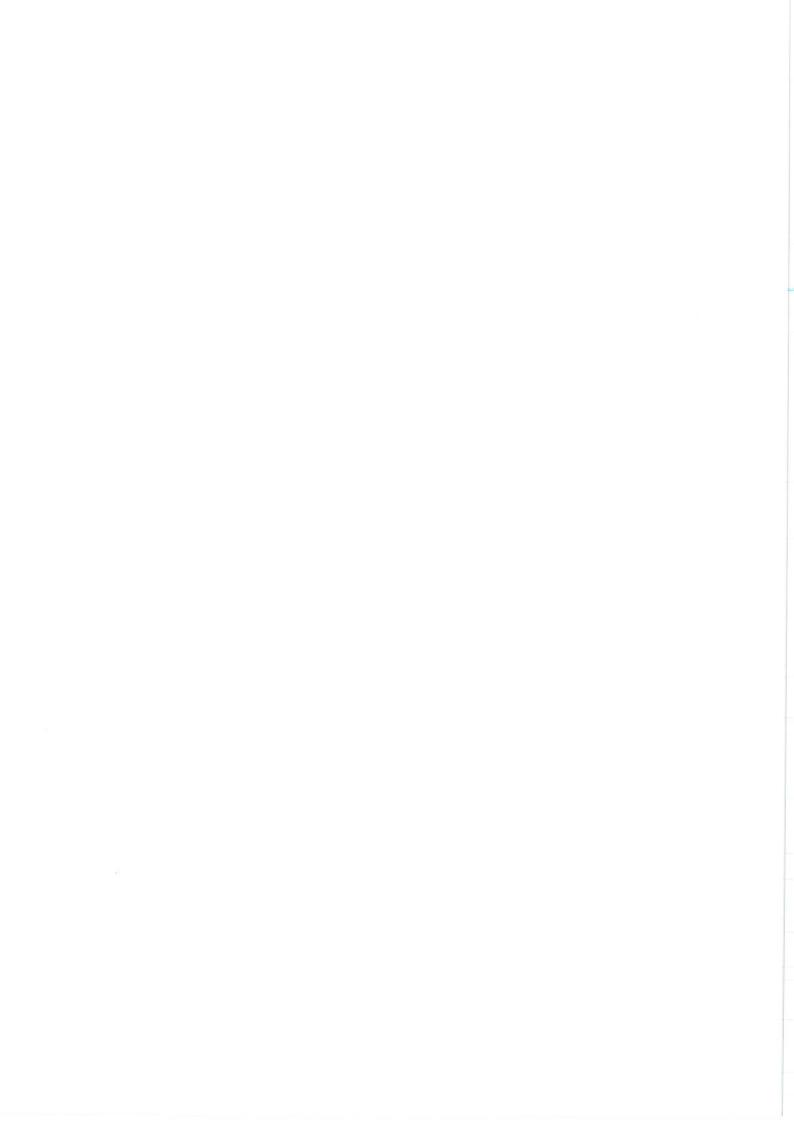
Paragraph	Comments
/ Question	
Ref	
	Please see accompanying letter. Comments, in the main, relate to section 5 of the Refined Issues and Options Consultation.

Please use next page if necessary

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.





27th August 2020

Planning Policy, Test Valley Borough Council Beech Hurst, Weyhill Road, Andover, SP10 3AJ

Dear Sir/Madam,

RE: Consultation response to Test Valley Borough Council's (TVBC's) Refined Issues and Options Consultation June 2020 on behalf of Obsidian Strategic

On behalf of our client, Obsidian Strategic AB Limited, I write in response to the Council's current consultation on the Refined Issues and Options Document June 2020 (hereafter referred to the 'RI&O'). My clients have a continued interest in the land west and south of Test Valley School, Stockbridge, as identified on the plan appended to this response, and it is in this context that this representation is made. The site has previously been submitted to inform the SHELAA with reference 237. We welcome this most recent consultation, which seeks further guidance from Test Valley communities, landowners and promoters to inform the emerging plan. This response will focus on section 5 – Living in Test Valley (Housing and Communities) and the questions within the section given the potential role the land my client controls can play in meeting housing and community needs.

This response will begin by considering the issues and options relating to housing needs, potential distribution of development and settlement sustainability and hierarchy, before briefly outlining how the land west and east of Test Valley School, Stockbridge represents an attractive option for allocation in the local plan to help sustainably meet the Borough's housing and community needs.

Housing Need and Distribution

The housing need based on the current Housing Method, as set out in the RI&O, is 550 homes per annum. However, in the recently published new standard method to calculate housing requirements, TVBC's housing requirement will increase by nearly 50% to a requirement of 813 units per annum. The new Standard Method is not yet formally adopted, but given Government's commitment to both boosting the supply of housing to deliver 300,000 homes per year nationally and reforming the planning system, there is every reason to suggest that the need to deliver significantly more houses, nationally



and within the Borough, will be brought forward. The requirement to deliver 813 new homes per annum should therefore form the basis for progress of the plan. This will inevitably mean more sites will need to be allocated for new homes and these should be delivered across the Borough

We are pleased that at para. 5.16 the RI&O document recognises the support for housing growth to be more widely distributed, and we would strongly support such a strategy. Historically, the approach to distributing development in the Borough has focused on allocating the majority of sites on the edges of Andover, and to a lesser extent, Romsey. However, continued allocation at Andover in particular would no longer represent sustainable development. This is because Andover has grown in recent years to such an extent that any new allocations on its outer edges would be located beyond walking distance of the Town Centre and the services and facilities it offers. We note that at 5.17 suggests regeneration of Andover town centre may play a role in providing new homes; however, densification of the town centre would only help meet a relatively small proportion of the Borough's housing requirement. Andover has continuously taken the majority of the Borough's Housing need, which has rightly made Andover more affordable.

However, this has been to the detriment of the rest of the Borough, which has become increasingly unaffordable, particularly to the young and first time buyers. Reviewing the affordability evidence, the Test Valley Strategic Housing Market Assessment (SHMA) (January 2014) and Review of the Housing Evidence Base (July 2016) shows that entry level purchase prices in Stockbridge are the highest in the Borough. Average house prices in Central - Rural Test Valley, where Stockbridge is located, are £475,000 and this requires an annual income of over £122,000 for first time buyers and a deposit of nearly £50,000. In Stockbridge, the situation is even more pronounced and the Parish Profile prepared by TVBC highlights that average house prices in 2016 were £661,480, representing an increase of 21% in the last five years. Zoopla's latest figures show that average house prices have increased to £689,322.1

The socio-economic profile of rural Hampshire (2016), prepared by Hampshire County Council confirms that within a large central swathe of Test Valley, within which Stockbridge is located, the ratio of median house prices is over twelve times higher than median household income.

Coupled with rising house prices the Parish Profile also shows that the population of Stockbridge is aging. In 2016, 41% of the Parish were aged 65 and over, with an expectation for this to increase to 43.5% by 2021. A corresponding decrease in middle aged residents is expected, with the age group 40-64 set to decline by 4.3%. This demographic trend is also seen in household composition with



average occupancy in Stockbridge at 1.9, significantly below the national average of 2.4. In addition, 43.2% of Stockbridge's households are occupied by just one person, despite 29.7% of the housing stock being in Council Tax Bands F to H (compared to just 17.1% of all Test Valley properties), suggesting that existing housing stock is likely to be largely unoccupied.

Two primary concerns are identified: 1) the population is ageing with little opportunity for downsizing; and, 2) there are significant affordability issues. The culmination of the issues is a significant factor in preventing a stable and mixed population within the local area and directly conflicts with the provisions and objectives of the NPPF. The implications of these socio-economic trends for Test Valley as a whole is a polarised housing market and population demographic which, if left to continue, represents a significant risk to the future economic and social prosperity of a large part of the Borough.

In summary, we strongly support the wider distribution of development to other sustainable locations in the Borough, particularly the central rural areas of the Borough where affordability issues are most acute. Failure to consider options for development away from Andover will only exacerbate existing inequalities across the Borough and undermine the ability for residents and their families to stay in Test Valley, a key aspiration identified by a large number of local respondents to the initial Issues and Options consultation.

Settlement Hierarchy

We are pleased that the RI&O document appears to be open to considering a revised approach to the settlement hierarchy and the types of development that can be accommodated at each settlement. The existing approach to the settlement hierarchy has led to an unbalanced approach to growth in the district, exacerbating the concerns raised above relating to affordability and inequalities across the Borough. Policy COM2 and associated table 7 of the adopted plan recognise that 'Key service centres', such as Stockbridge, should accommodate strategic allocations.

However, no such strategic allocations have occurred in Stockbridge, a settlement at the heart of the rural part of the Borough where affordability issues are most acute. This compares to the other five identified Key Service Centres, which are essentially satellites to either Andover or Southampton. Whilst having similar levels of service provision, they already host a markedly higher population than Stockbridge as shown on the adjacent table.

Key Service Centres	Popultation
Charlton	1,947
Chilworth	1,204
North Baddesley	6,823
Nursling & Rownhams	5,137
Stockbridge	592
Valley Park	7,713



Whilst there are constraints, such as flood risk, ecology and conservation towards the centre of Stockbridge which constrain growth in that particular part of the settlement, the same cannot be said of the western and eastern edge of the settlement. Clearly, Stockbridge has the capacity to grow modestly and sustainably, and if the affordability and inequality issues are to be addressed, this must be allowed to happen.

Stockbridge is demonstrably a sustainable settlement, and this is recognised by its status as a Key Service Settlement. The appended Stockbridge Amenities Plan identifies the range of services within Stockbridge and shows that it has the capacity to expand on its edges whilst still been accessible for walking and cycling. As identified above, the demographic of Stockbridge is ageing. If the settlement is not allowed to sustainably grow, and the affordability issues allowed to continue, this inequality will continue and indeed worsen. This will over time risk undermining the viability of the range of shops and services within the town and increase the lack of diversity of the community, making Stockbridge less socially and economically sustainable.

On the other hand, if modest strategic housing growth is allowed on the significantly less constrained edges of the town, for example on the land adjacent to Test Valley school, this will allow young people and families to stay in the town, reducing inequalities and improving the viability of shops and services to serve the existing and future residents located at the heart of the district.

Land west of Test Valley School, Stockbridge

The land west of test Valley school, Stockbridge offers an important opportunity for the town to sustainably grow. The land has previously been promoted with SHELAA reference 237. The TVBC SHELAA report 2019-2020 confirms that the site is available and developable within three years, helping to address affordability concerns early in the plan period.

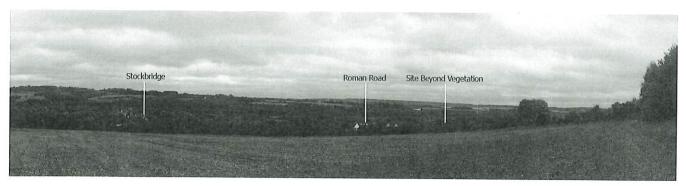


Figure 1 - View from Meon Hill looking south towards site screened by existing topography and vegetation with Stockbridge and Roman Road in view,



As identified on the appended amenities plan, the site is within easy walking distance of the many amenities and services of the town, as well as public transport options which allow the choice of sustainable travel out of the settlement when required. The site is also not constrained by flood risk, built heritage constraints or overriding ecological sensitivities and this is confirmed by the TVBC SHELAA. In landscape terms the site is largely hidden by strong vegetated boundaries to the north, south and west, and the existing built form to the east. This is demonstrated by figure 1 above taken from the north of the site from Meon Hill looking south towards site.

The site therefore represents a very suitable option for new development of about 50 new homes, including affordable homes, which will help address the acute affordability issues in the area and help families and young people stay in the village.

We have also previously promoted the land south of Test Valley school (SHELAA reference 236) and this larger piece of land remains available and deliverable as a suitable potential residential development option. However, as an alternative, we have also identified that the land has potential to instead act as mitigation land to offset nitrate generation generated by new residential development in the wider Test Valley area. All new developments for overnight accommodation must demonstrate that they do not result in a 'net gain' in nitrates entering the Solent SPA. Most new residential developments, particularly on brownfield sites, are unable to demonstrate no 'net gain' and so, as it stands, would fail the Habitat Regulations Assessment (HRA) and cannot be legally granted planning permission. This would continue to apply to future potential strategic allocations in the Borough unless suitable mitigation can be delivered. One such method of mitigation is to take existing agricultural land out of agricultural use which reduces the nitrates entering the Solent through reduced use of fertilisers. This is an approach adopted by a number of Local Authorities, including Winchester City and Eastleigh Borough Councils. Initial investigations suggest if the land south of Test Valley school where taken out of agricultural use, this would provide suitable nitrate 'credits' to offset the nitrates produced by a significant number of new homes (in addition to the number promoted at land west of Test Valley school). We are exploring the ability of the land to offset nitrates further and would be happy to discuss this opportunity with TVBC to help them sustainably deliver their housing in a way which does not harm sensitive ecological sites.

Conclusion

Overall, we support the suggestion in the RI&O document that the approach to housing distribution needs to be radically adjusted from previous plans to better distribute development towards the heart of the Borough. The rural heart of the Borough has suffered from years of restrained growth due to a focus on housing delivery at Andover and Romsey, which has led to an acute affordability crisis at the centre of the Borough, making it more and more difficult for younger people and their families to stay



in Stockbridge and the surrounding area. The modest growth of Stockbridge, as the most sustainable settlement at the heart of the Borough is therefore essential to address the acute affordability challenges and help ensure the continued social and economic vitality of this beautiful part of the Borough. The land promoted west of Test Valley School has the potential to be an important component of that growth. The site is available now and can be delivered quickly, helping to meet the affordability challenges in the area early in the plan period which will support the social and economic sustainability of Stockbridge whilst protecting its unique environmental qualities.

