

Planning Policy and Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

27 August 2020

Dear Sirs,

NEXT LOCAL PLAN: REFINED ISSUES & OPTIONS CONSULTATION 2020

I write on behalf of _____ regarding the above consultation.

owns land off Horsebridge Road, Broughton and therefore wishes to comment on the Council's options for the rural area.

Planning Practice Guidance (PPG) notes¹:

"the location of new housing can also be important for the broader sustainability of rural communities".

The PPG goes on to state that allocation of sites in the rural area should be considered strategically, and through the Local Plan and/or neighbourhood plan process.

Furthermore, the same PPG paragraph notes:

"A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness".

The 2018 Issues & Options consultation recognised that there are specific challenges for the rural areas, including the affordability of property and the lack of suitable accommodation for young families and the elderly². We support the objective to consider what role our villages will have and whether they are suitable to accommodate new development over the next 20 years.

¹ MHCLG Planning Practice Guidance - Paragraph: 009 Reference ID: 67-009-20190722 Revision date: 22 07 2019

² Our future – how do we plan for it? Issues and Options Consultation for the next Local Plan; paragraph 5.12.

Overall responses to the 2018 Issues & Options consultation support the strategy for a wider distribution of housing to a larger number of settlements³. This support extends to the provision for housing sites across the rural areas to a number of villages, together with a wider range of smaller site allocations. The Council's commitment that the next Local Plan will consider the future scale of growth for the rural area and the strategy options for housing development, is supported⁴.

Since the September 2018 Issues & Options consultation, the National Planning Policy Framework (NPPF) has been updated⁵. The objective of '*significantly boosting the supply of homes*' remains⁶, along with the emphasis for land to come forward where it is needed.

The NPPF also notes⁷ that '*small and medium sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly*'. Accordingly, the NPPF requires at least 10% of the housing requirement should be on land no larger than 1ha.

The NPPF also acknowledges the need for promoting sustainable development in rural areas⁸ by stating that '*housing should be located where it will enhance or maintain the vitality of rural communities*'. It goes on to recognise⁹ that in some instances, community needs in rural areas '*may need to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport*'.

More recently the Government has published a new White Paper for consultation¹⁰. This proposes a fundamental reform of the planning system to address its underlying weaknesses and create a system fit for the 21st century. To achieve this the Government will seek to simplify the role of Local Plans, to focus on identifying land within three categories:

- Growth areas;
- Renewal areas; and
- Protected areas.

The latest White Paper promotes a shift in emphasis to plan 'making'. It suggests that renewal areas "suitable for development" could include small sites in and around villages¹¹. This is consistent with the Refined Issues & Options approach to revisiting settlement boundaries¹². Hence, it is likely that the next Local Plan will be required to identify specific sites for development, even in rural areas. This is supported.

It is appropriate that the Issues & Options stage includes a review of the approach to distributing growth through the adopted settlement hierarchy. A review of the settlement boundaries is also

³ Para 5.16 – TVBC Next Local Plan: Refined Issues & Options Consultation, June 2020

⁴ Para 5.19 – TVBC Next Local Plan: Refined Issues & Options Consultation, June 2020

⁵ February 2019

⁶ NPPF#59

⁷ NPPF#68

⁸ NPPF#78

⁹ NPPF#84

¹⁰ 'Planning for the Future', August 2020

¹¹ p29 'Planning for the Future', August 2020

¹² Paras 5.24 – 5.29 (Q8-12) – TVBC Next Local Plan: Refined Issues & Options Consultation, June 2020

supported. This should include consideration of amending boundaries in settlements that could sustain more growth over the plan period to encourage development proposals. Rather than defining boundaries by the existing built area, this could be a positive means of planning for the future and identifying further sustainable development potential on the edge of settlements. Such a review should involve the local community, including local stakeholders promoting development opportunities, and be based on a clearly defined methodology.

Broughton is identified in the existing settlement hierarchy as a 'Rural Village'. This recognises that the village does benefit from several local services and facilities (including church, public houses, primary school, community shop and a bus service). It is also in close proximity to a number of other villages with facilities south-west of Stockbridge, and equidistant from Romsey and Andover. In principle therefore, the settlement can sustain more growth over the plan period, and some growth is likely to be needed to help sustain the existing facilities and services over the next 20 years, for example family housing supporting the local primary school.

owns land on the edge of Broughton. The land is included within the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA), identified as "Land adjacent to Hyde Farm, Horsebridge Road"¹³.

Land adjacent to Hyde Farm is well connected to the village, with access via Horsebridge Road, and public rights of way providing further direct routes to the centre of the village and its cluster of community facilities. The SHELAA notes that local amenities are within walking distance and that there is a bus stop Horsebridge Road. This site compares favourably in accessibility terms to other sites identified in the SHELAA.

The SHELAA states the site has potential for 45 dwellings. This appears to be a crude calculation of the site area and application of a typical 30 dwelling per hectares in rural areas. The capacity of the site is likely to be less when access arrangements, landscaping and the character and appearance of the setting, are considered. A capacity of 20-25 dwellings is likely to be more appropriate.

The SHELAA notes that the site is achievable and deliverable. It also states, however, that the site is not "suitable" for development, without explaining why. It is assumed that the Council's reasoning for this conclusion is that the site is currently outside of the settlement boundary and therefore open countryside, where adopted policies generally resist development. A policy change would therefore normally be required for development to be supported (unless, it was through an exception policy, such as community led development). Review of the local plan, including the settlement boundaries and review of the strategy for the rural areas, provides opportunity for the status of the site to be reconsidered.

Development in this area, as well as many other areas of the village, would need to be informed by a careful appraisal of the impact on the adjacent Conservation Area, listed buildings and the wider landscape, and also the Village Design Statement (2004).

¹³ SHELAA ref.116

In summary, positive planning is needed to ensure that rural settlements do not fall in to the 'sustainability trap'. National policy and guidance continue to support growth in the rural areas, to sustain thriving rural communities and help address the problems of affordability and lack of choice in housing to cater for changing needs, for example young families and the elderly.

Consideration should be given, as part of the option of a mixed approach, to allocating sites (particularly small and medium sites) in the rural areas, and other positive planning initiatives to support rural areas in a sustainable way such as amendments to the settlement boundary.

Broughton is considered to represent an appropriate (and sustainable) location for new residential development. Land off Horsebridge Road is both available and suitable and could make an important contribution to meeting both the Borough's identified housing need and sustaining existing community facilities in the village.

We would be grateful if you could acknowledge receipt of this letter. If you have any other questions or comments please don't hesitate to contact us.