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By email: planningpolicy@testvalley.gov.uk
Date: 25th August 2020
Job ref: BS-2324

W: www.CLPlanning.co.uk

Dear Sir/Madam,

Test Valley Borough Local Plan Refined Issues and Options Consultation 2020: representation on behalf of WH White Ltd

I herein submit a representation on behalf of WH White Ltd on the above consultation, which is accompanied by a completed comments form. It should be read in conjunction with a separate Strategic Housing and Economic Land Availability Assessment (SHELAA) submission, which promotes land at Bunny Lane, north of Romsey, for a mixed-use allocation (see inset location plan).



Introduction

The purpose of this refined issues and options consultation is to focus four main themes, namely:

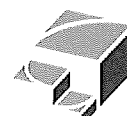
- Living in Test Valley;
- Working in Test Valley;
- Enjoying Test Valley; and
- Community facilities and infrastructure.

The consultation document includes specific questions, a number of which WH White wishes to respond to. The format of this representation is to comment on the content of the document and intersperse it with WH White's responses to specific questions. WH White is supportive of the four broad areas, noting that development at Bunny Lane would help support all of them.

Living in Test Valley

WH White's general response

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This chapter of the document focusses on delivering housing, citing an annual requirement of 550 homes, as per the standard method for calculating local housing need set out in the Planning Practice Guidance (PPG). It is vitally important for councils to *'support the Government's objective of significantly boosting the supply of homes'* enshrined in paragraph 59 of the National Planning Policy Framework (NPPF). However, WH White is concerned that the timetable set out for the plan production would delay the Council's ability to do this.

The first public consultation stage in the plan-making process is the Regulation 18 Issues and Options stage. WH White notes that the current consultation follows an Issues and Options consultation, which took place during summer 2018. However, that appears not to have been the official Regulation 18 stage, as the diagram at paragraph 1.15 of the consultation document indicates that a further 'preferred options' consultation is expected in Q1 of 2021, which it appears will in fact be labelled the Regulation 18 consultation. This current refined options consultation is therefore a very early stage of the plan-making process, with no statutory consultation stages preceding it.

WH White finds the terminology used by the Council confusing. A Regulation 18 consultation is required by law to *'(a) notify each of the bodies or persons specified... of the subject of a local plan which the local planning authority propose to prepare, and (b) invite each of them to make representations to the local planning authority about what a local plan with that subject ought to contain'*. Therefore, labelling a preferred options consultation as a Regulation 18 stage is at odds with the requirements of the regulations.

Putting that issue to one side, projecting forward, WH White notes that a *'potential consultation on further draft document'* in Q3 of 2021 is also allowed for in the timetable. This will come after the preferred options and before the Regulation 19 pre-submission consultation in Q3 of 2022. A year and a half will therefore pass between the purported Regulation 18 and 19 stages. Thereafter, the Council anticipates waiting a further year after the pre-submission consultation until the plan is submitted to the Secretary of State in Q3 of 2023.

The result is that the Council anticipates adopting the new local plan in Q3 of 2024, which will be some six years after the first round of consultation and more than eight years since the current local plan was adopted. WH White is somewhat concerned by this timetable, in light of the requirement in paragraph 33 of the NPPF, which states:

'Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their

applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future'.

Clearly, the envisaged timetable means that the Council will fall foul of paragraph 33 and the mandate from central government to get building new homes.

WH White respectfully suggests that the timetable is unnecessarily lengthy and far longer than the 30-month period mooted in MHCLG's recent Planning for the Future White Paper. WH White's proposed solution is to revise the Local Development Scheme by removing any further non-statutory consultation stages and cutting the period between statutory stages.

On the subject of the recently published White Paper, WH White notes that a new revised method for calculating local housing need is also out to consultation. Using this new method, Test Valley's annual target could rise very significantly from the current target of 550dpa in the consultation document to 813dpa, an increase of 48%. If the requirement under the Duty to Cooperate to take into account any neighbouring authorities' unmet needs remains (notwithstanding the White Paper's proposal to remove it), this could add significant pressure to deliver large sites in the borough.

Having regard to the strategy to achieve this, paragraph 5.16 of the consultation document notes how:

'The strategy of a wider distribution of housing to a larger number of settlements was supported. This included provision for housing sites across the rural areas'.

WH White supports this, as does paragraph 72 of the NPPF, which states:

'The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities'.

WH White would also add that locations surrounding the most sustainable settlements would play the greatest role in delivering sustainable development. Romsey and Andover have been the focus for development in the current local plan, recognising their sustainability credentials and roles in their respective Housing Market Areas (HMAs), but it is clear that planning constraints limit the potential for the further growth of these towns. Taking Romsey as an example, the adopted policies map shows the presence of settlement gaps, SINC's, and the significant grade II* Registered Historic Park and Garden at Broadlands to the south of the town.

As set out in this representation, land at Bunny Lane is located around a mile from Romsey, meaning that development of a new village here could play a vital role in alleviating pressures to

develop the town further, at the same time as having a critical mass that would allow it to be a self-sustained satellite village. Such an approach is already successful in Test Valley, with the Picket Piece development playing a satellite role to Andover. WH White sees the south of the borough as a growth area, which can utilise garden city principles.

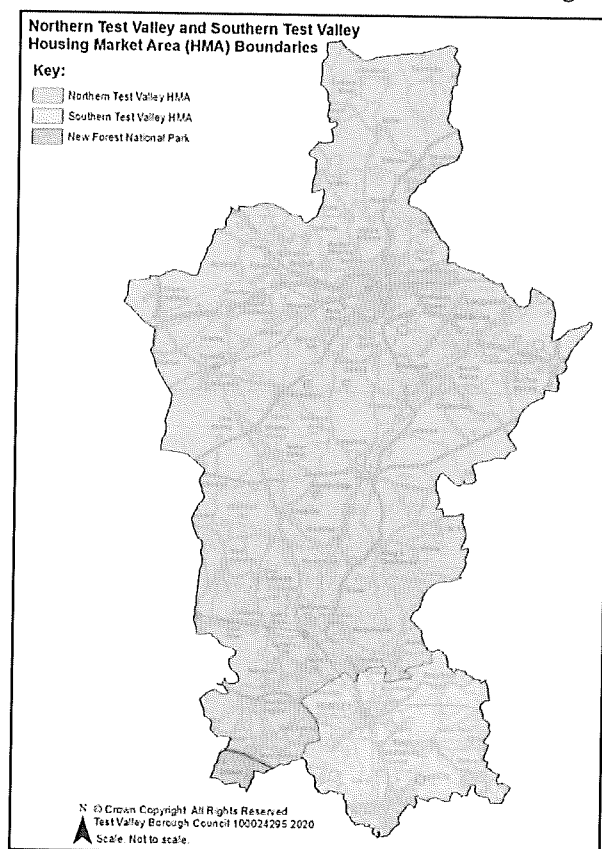
Land at Bunny Lane is thus a highly credible option to deliver sustainable development and make a significant contribution towards meeting the significant development pressures on the horizon. WH White is mindful that the current local plan has allocated a substantial new neighbourhood to the south of Romsey, so development to the north of the town would create more of a balance.

WH White also supports the Council's key priority for delivering a housing mix, including self-builds and affordable housing. It is widely held that the best way to deliver affordable housing schemes is through the economies of scale that can be achieved with large settlement extensions on greenfield sites. Again, land at Bunny Lane is extremely well placed to help deliver such objectives.

Living in Test Valley – WH White's response to questions

Question 1 of the document refers to the borough's two HMAs, which are summarised in figure 1 of the document (see inset map excerpt). WH White notes that the Southern Test Valley HMA is much smaller than the northern HMA and effectively comprises Romsey and some peripheral settlements. WH White would argue that this does not accurately reflect the relationship between Romsey and settlements such as Timsbury, Michelmarsh and Braishfield, which are located approximately a mile to the north of the town and have a clear and close functional relationship in terms of where people live and work. WH White therefore supports the suggestion in question 1a that the HMA boundaries should be revised and believes that it should encompass the above-mentioned villages and their respective hinterlands.

The most logical way to redraw the boundary would be to use parish boundaries, which are



easily identifiable, established and include settlements that have a closer and more functional relationship with the Southern HMA. Figure 1 below is an annotated parish boundary map¹, which shows WH White's suggestion to use the Mottisfont, Michelmersh and Braishfield parish boundaries.

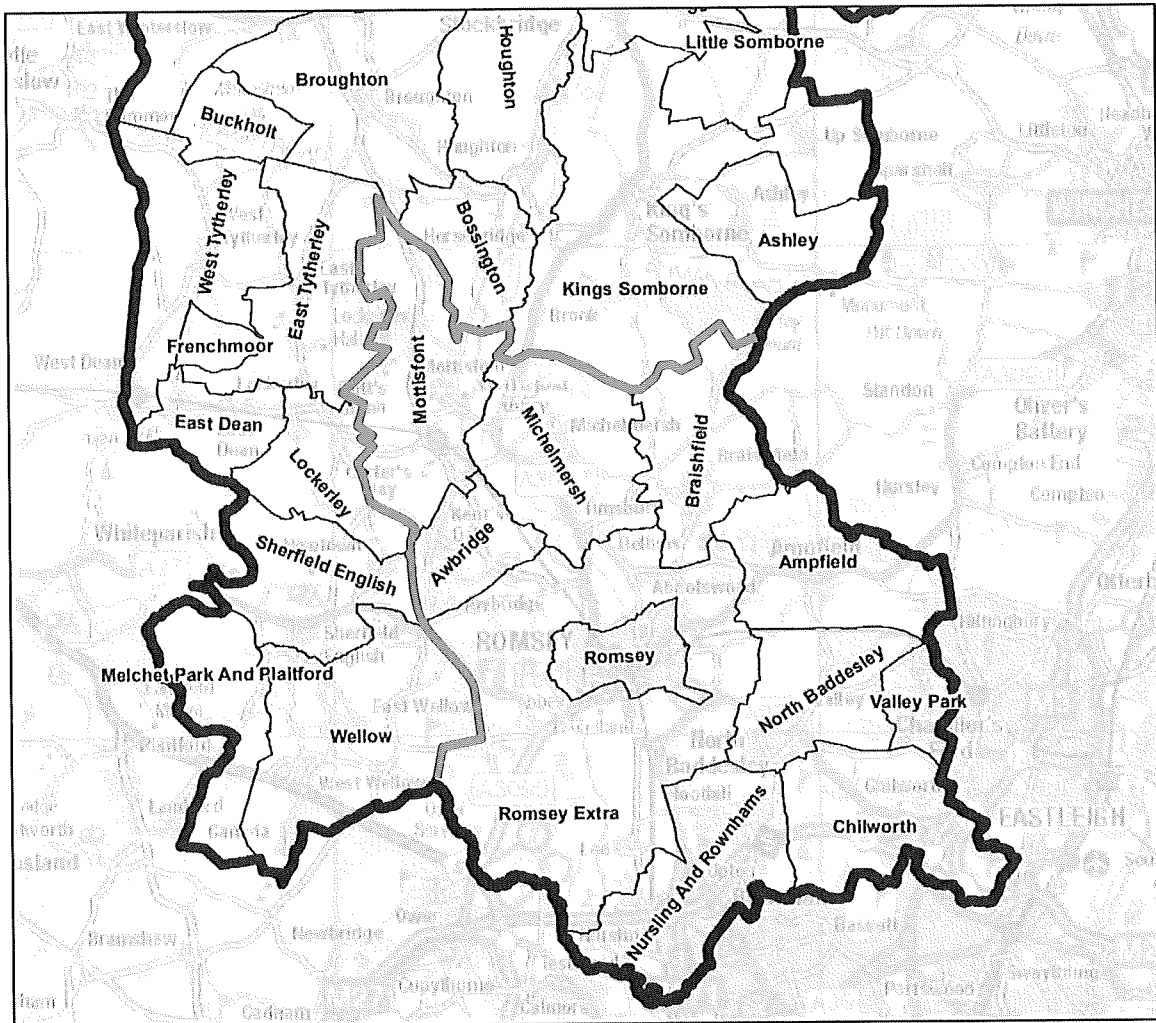


Figure 1: WH White's suggested Southern HMA boundary (coloured orange)

Question 7 asks how to treat rural settlements that are close to other larger settlements and can therefore easily access their facilities and services. WH White believes that this is an important aspect of delivering sustainable development as set out in the general response above. Taking Romsey as an example, this is a top-tier settlement and therefore the most sustainable part of

¹ Source: www.testvalley.gov.uk

both the borough and the Southern Test Valley HMA. However, it is notably constrained and with little prospect of further expansion. As such, it is incumbent on the Council to explore opportunities to consider the merits of new settlements in unconstrained locations, which can act as satellite villages to Romsey. WH White's site at Bunny Lane is one such excellent opportunity and figures 2 and 3 below provide excerpts from the Transport Appraisal Statement accompanying the SHELAA promotion, identifying the number of facilities within walking and cycling distance of the site.

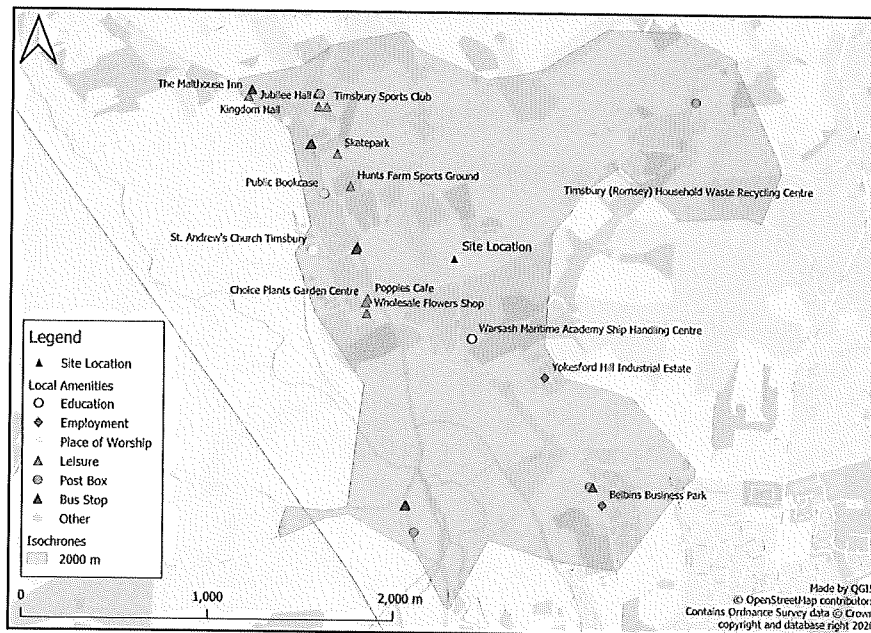


Figure 2: facilities and services within walking distance of the site

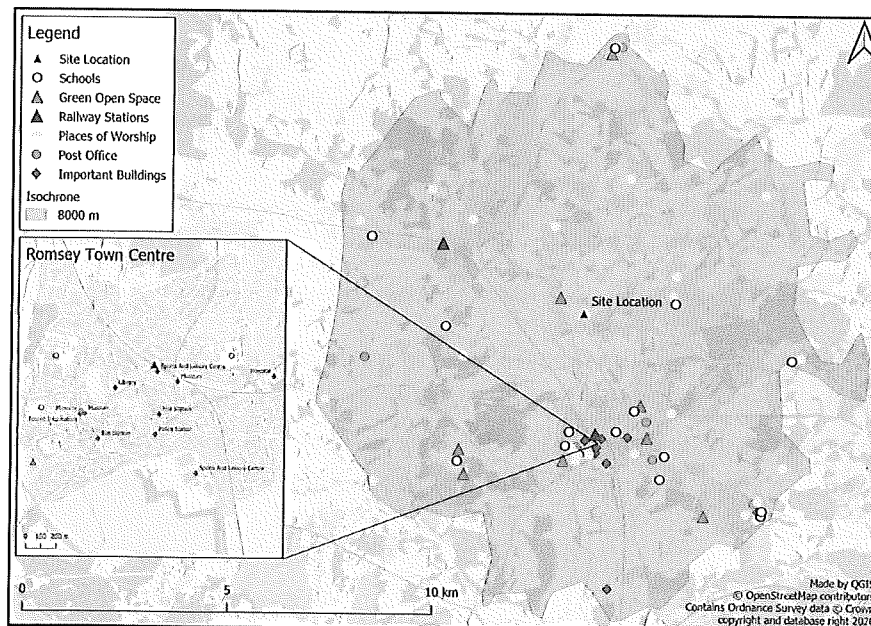


Figure 3: facilities and services within cycling distance of the site

Question 14 asks whether there should be a policy to include a proportion of large housing sites as serviced, self-build plots. WH White believes that the best way to deliver a comprehensive mix of housing types and tenures is via large sites and is therefore supportive in principle to allowing for a proportion of self-builds. However, there would need to be checks and balances in any future policy to ensure that in the event a plot is not purchased, then it can revert to a housebuilder. Otherwise, there could be a risk of empty plots.

Working in Test Valley – WH White’s general response

The consultation document recognises the vital role of centres in meeting local people’s needs. It is important that enough flexible facilities are provided to ensure sufficient retail and other floor space caters for the needs of communities, enabling them to be as self-sustained as possible. The advantage of a masterplanned new settlement, such as WH White proposes at Bunny Lane, is that the level of floor space and other community needs can be planned to reflect the exact number of homes being proposed and therefore strike an excellent balance. As detailed in the SHELAA promotion accompanying this representation, it is envisaged that a new village at Bunny Lane would include its own local centre.

WH White is supportive of the consultation document’s *‘aim to be positive in supporting future economic growth and productivity, alongside quality of life and protecting the Borough’s environmental assets’*. It is vital that the right balance is struck that provides a suitable quantum of flexible employment opportunities. Paragraph 6.19 of the document recognises the potential to integrate employment development with housing through mixed-use schemes, which was supported by the public at the previous consultation stage. Paragraph 6.25 goes on to discuss the need to upskill the workforce and offer local residents a range of job opportunities at a range of skill levels. Again, a new settlement at Bunny Lane would be the ideal opportunity to achieve these objectives through a masterplanned, mixed-use development.

Working in Test Valley – WH White’s response to questions

WH White notes that there are only two questions in this section of the document, both of which relate to tourism. Given the government’s clear drive towards economic growth (and post-Covid recovery), it is surprising there are no questions about the provision of employment-generating development and mixed-use schemes, which WH White fully supports. Such schemes are important in terms of promoting self containment.

Enjoying Test Valley – WH White’s general response

Section 7 of the consultation document begins by emphasising the high value local people place on the borough’s countryside, landscape, biodiversity and wildlife. It goes on to note how the NPPF attributes particular importance to conserving and enhancing National Parks (the New

Forest located to the southwest of Test Valley) and Areas of Outstanding Natural Beauty (such as the North Wessex Downs AONB, which covers a large proportion of the borough). Meanwhile, local gaps play an important role in preventing the coalescence of settlements in Test Valley, and are widely featured as planning tools elsewhere in southern Hampshire. Local green spaces are rightly protected, while the importance of the historic environment is recognised through designated and non-designated heritage assets. In addition, areas at risk of flooding constrain where development could go, as do nationally and internationally important nature conservation sites.

The richness of Test Valley's environment is a distinct advantage that gives the borough its sense of place. However, WH White must emphasise that an appropriate balance has to be struck that allows this environment to thrive, while at the same time meeting the demand for new homes, businesses, facilities, services and infrastructure. Finding appropriate, unconstrained locations to develop will therefore be a challenge, so opportunities to deliver sustainable development should be seized.

A new settlement at Bunny Lane would be an excellent opportunity to deliver development without prejudicing the borough's protected landscape, heritage or biodiversity. It would allow for the restoration of land previously in use for landfill and currently in use for waste processing, which is a detracting feature in the landscape. It would also provide opportunities for significant new public open space and green infrastructure in the form of a Suitable Alternative Natural Green Space (SANG), which in itself would help alleviate the pressure on European sites found elsewhere in the borough.

Enjoying Test Valley – WH White's response to questions

N/A. There are no questions in this section of the document.

Infrastructure and community facilities – WH White's general response

Section 8 of the consultation document notes how one of the key objectives of the new plan will be to deliver sustainable physical and social infrastructure. Paragraph 8.2 also sets out the Council's wish to explore how the local plan can support existing facilities in villages.

WH White would suggest that a strategy led by the creation of new settlements could help achieve these objectives. A new settlement could be masterplanned and therefore the right infrastructure and the right range of uses would be in the right places to serve the new community. As set out above, the development of land at Bunny Lane would perform a role as a satellite to Romsey, but equally, it would help support the facilities and services of neighbouring villages. For example, it would support the garden centre and businesses to the west of the site; the places of worship, pub, sports ground and village hall at Timsbury; the bus service on the A3057; businesses in

Michelmars; and the numerous facilities and services of Braishfield. Development would also maintain or upgrade existing rights of way and bridleways, with a new cycle/walkway to allow easy connections to neighbouring facilities and services.

WH White notes the statement in the consultation document that the Council will produce an infrastructure delivery plan to accompany the local plan. WH White will be interested to see the content of this document and would be committed to delivering any reasonably required offsite infrastructure improvements.

Infrastructure and community facilities – WH White's response to questions

N/A. There are no questions in this section of the document.

Summary

WH White notes the number of challenges facing the borough in terms of meeting housing needs, economic growth and other development needs, at the same time as balancing the requirement to safeguard Test Valley's protected natural and historic environment. The issues highlighted in the consultation document therefore appear logical and WH White is generally supportive of them. Taking these factors onboard, WH White strongly believes that the plan should be led by a strategy that seeks to deliver a wider distribution of housing across rural areas. From the responses to the Issues and Options consultation, such a strategy would garner local support and it would also allow facilities and services in existing settlements to be bolstered by new residents. National policy would clearly support such a strategy, as detailed in paragraph 72 of the NPPF.

To assist with delivering such a strategy, WH White is delighted to promote land at Bunny Lane for a mixed-use scheme, comprising new homes, employment, a school, local centre and a significant SANG. Further details are provided in the SHELAA promotion and the technical reports accompanying this representation. A scheme here would complement and support neighbouring villages and support Romsey. In order to recognise the existing relationship between the site, the surrounding villages and Romsey, WH White strongly advocates a redrawing of the Southern HMA boundary.

WH White is, however, concerned with the envisaged timetable for the production of the plan. The number of consultation phases appears unnecessary (the regulations certainly do not require that many) and the scheduled adoption in 2024 would mean more than eight years would pass since the current plan was adopted, making it well out of date. WH White therefore respectfully suggests that the Council revisit its Local Development Scheme, in order to continue to facilitate the delivery of new homes and economic growth without delay. This is particularly pertinent in light of the potential increase to the housing target of 813dpa. Quite simply, without an up-to-date plan, development in the borough would be at risk of not being plan-led.



WH White is keen to be kept up-to-date with progress on the local plan and would be grateful to be added to any planning policy consultation database the Council may have. In the meantime, I trust this representation will prove useful in the production of the plan and I would be delighted to discuss bringing forward land at Bunny Lane with officers, should it assist.

Yours faithfully,