

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 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
1	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 area? The current Housing Market Areas include the vast majority of the district within Northern Test Valley HMA and spatially includes numerous parishes which have a closer relationship to the Southern Test Valley HMA including Romsey and the PUSH area. In central Test Valley, the Parishes have a more equal relationship with Romsey and Andover but the current HMAs do not reflect this. Spatially the HMAs are not considered to be fit for purpose and need to be reviewed. The spatial strategy in the current Local Plan has aimed to focus the majority of the Borough's housing requirement in the Major Centres and Key Service Centres, with separate pots for each HMA. In the North Test Valley HMA, these include Andover, Stockbridge and Charlton. However, existing allocations have been principally focused in and around Andover, with a small pot without defined allocations for the rural villages. By contrast in Southern Test Valley HMA the distribution of housing has a greater reliance on the Key Service Centres including Nursling and Rownhams, North Baddesley and, Valley Park. This approach better responds to the market by providing greater choice of housing in more varied locations. Whilst there is a better distribution of housing in Southern Test Valley, in both HMAs there are numerous rural villages which although sustainable have seen very little development. A lack of development in these rural villages means that they have become highly unaffordable and exclusive, it also puts at risk established services and facilities which require a critical mass to be sustained. The current HMAs and settlement hierarchy exacerbate this (see also our representations to Question 4). It is our opinion that a revised approach to include three HMAs following Ward boundaries is a better approach and overleaf is a plan showing how these could be structured. In summary, this includes a much-reduced North Test Valley HMA and an enlarged Southern Test Valley HMA, together with a new Central Test Valley HMA centred on Stockbridge. This approach is considered to better reflect the spatial characteristics of the Borough and would help to deliver a more appropriate distribution of housing that recognises the importance of the rural villages.

Key:

-  Northern Test Valley HMA
-  Southern Test Valley HMA
-  Central Test Valley HMA
-  Ward Boundaries
-  Parish Boundaries



2	In determining HMAs how should wider relationships with settlements beyond the Borough's boundaries, be taken into account, including with Southampton, Salisbury and Winchester? The concept and use of housing market areas in strategic planning is well established, with a long-standing recognition that housing markets do not operate based on administrative boundaries. A housing market area is generally understood to be a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work. It is therefore appropriate to consider the relationships with settlements beyond the Borough's boundary. Central and Southern Test Valley includes Romsey and sits between the three City areas, Winchester, Southampton and Salisbury, whilst the northern portion of the Borough is centred on Andover. Romsey and Southern Test Valley has a clear functional relationship with Southampton and the wider PUSH area, and it is considered that the Southern Test Valley HMA should be enlarged to include the rural parishes in Romsey's hinterland (see representations in relation to Question 1). This revised HMA would recognise this relationship and therefore allow for more balanced housing distribution and better spatial planning generally. Northern Test Valley HMA should be reduced, retaining Andover and its surrounding hinterland. This would acknowledge the strategic roll of Andover in the northern part of the Borough, without over-stretching its influence. Within central Test Valley, it is considered that the functional relationship with key administrative centres within and outside the Borough is likely to be less clearly defined. As a consequence, determining precisely how this area should be separated between HMAs is unlikely to be straight forward. This area is centred on Stockbridge, which is a higher order settlement that hosts a range of services and facilities and caters for the day-to-day needs of many smaller rural villages in the central rural area. It is considered that the introduction of a new Central Test Valley HMA (see representations in relation to Question 1) responds to the spatial characteristics of the Borough by acknowledging that this central area neither fits neatly into Northern or Southern Test Valley HMA, it also highlights the significance of Stockbridge as an important service centre.
3	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? Boundaries based upon existing lower administrative output areas is supported.
4	Should the number steps of the settlement hierarchy be increased, for example by sub-dividing the 'rural villages' into two separate tiers? The NPPF does not provide specific advice for the production of settlement hierarchies. However, as a broad principle, it notes that planning policies and decisions should play an active role in guiding development towards sustainable solutions, taking local circumstances into account, to reflect the character, needs and opportunities of each area (paragraph 9, NPPF). Furthermore, to promote

	sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby (paragraph 78, NPPF). The Council's current settlement hierarchy includes just three tiers: • Major Centres • Key Service Centres • Rural Villages The Rural Villages are numerous, and the current hierarchy masks the comparative sustainability of a number of the rural villages by grouping them with numerous much smaller villages. It is considered that the current hierarchy misrepresents the high degree of variance within the 'Rural Villages' tier and consequently it does not serve the objectives of the NPPF, i.e. enabling development in the most sustainable locations in the Borough in line with the recommendations in of the NPPF. It is considered that the villages within the current 'Rural Villages' tier should be placed within three categories based on their comparative sustainability, comprising 'Rural Services Centres', 'Rural Clusters' and 'Other Rural Villages'.
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5	How should we decide which settlements to include within each step of the settlement hierarchy? The Test Valley Settlement Hierarchy Topic Paper was published in June 2014 to inform the current Revised Local Plan 2016. It was prepared following the broad principles established by the 2012 NPPF, which superseded most of the previous national planning policies. Whilst the 2012 NPPF did not provide specific advice and guidance for the production of settlement hierarchies, it made clear that planning should take account of the different roles and character of different areas as a core planning principle. In this regard planning authorities were encouraged to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. These broad principles have followed through into the latest iterations of the NPPF. Paragraph 78 of the latest NPPF confirms that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby. Given the passage of time since the 2014 settlement hierarchy was established, it is considered that an updated audit of facilities and services in Test Valley should be undertaken, which should also take account of established good practice from elsewhere. In this regard East Hampshire District Council has recently reviewed its
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	settlement hierarchy and in updating their audit methodology, they considered settlement hierarchy background papers for Aylesbury Vale, Guildford, Sevenoaks, Vale of White Horse, Warwick and Wycombe districts. This review identified that a good starting point is that criteria focusing on the range of local facilities and services; and accessibility indicators for employment opportunities, education and health services should be used to propose a settlement hierarchy. In line with the current DCLG consultation – ‘Changes to the Current Planning System’, which seeks to link housing delivery through a revised Standard Methodology to population projections, established dwelling stock and affordability, it is considered that Test Valley Borough Council should consider the critical mass (existing dwelling stock and population) of settlements and settlement clusters as part of the updated settlement hierarchy. Applying weightings to settlements based upon their existing mass will help to refine the hierarchy and direct development. In summary, it is considered that TVBC’s 2014 Settlement Hierarchy Topic Paper is generally based on the correct principles for defining a settlement hierarchy. However, this should be reviewed in line with best practice having regard to universally recognised audit methodology. It should also explore whether a weighting should be applied based upon population and existing dwelling stock.
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6	Should we consider groups of rural settlements together, where these are closely related to each other and/or share facilities and services? Paragraph 78 of the latest NPPF recognises that where there are groups of smaller settlements, development in one village may support services in a village nearby. This acknowledges that small villages may not perform particularly well when considered in isolation but that often groups of smaller villages that have a geographic and functional relationship can perform better when considered together. A number of such groups exist in Test Valley and it is considered that this should be recognised in the settlement hierarchy in order to ensure that the resulting spatial strategy properly acknowledges their development needs and capacity to accommodate growth. We fully support the approach of groups of settlements being considered in the hierarchy and consider that a new tier in the hierarchy, ‘Rural Clusters’, would recognise the unique attributes of these groups.
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7	How should we treat rural settlements which are close to other larger settlements and can therefore also easily access their facilities and services? In the same way that small villages should be assessed as groups, groups of settlements of disparate sizes should be treated in the same manner. Whilst smaller settlements close to larger settlements will perform a different role in terms of service provision to the larger host settlement they are close to, they may
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	have capacity to accommodate growth to support the role of the larger settlement and housing provision in these areas will help diversify dwelling stock and choice. It is therefore considered that the settlement hierarchy should have regard to this, by for example applying a weighting to the accessibility of public transport and walking/cycling distances. This weighting when coupled with the other criteria will determine the position of individual settlements within the hierarchy.
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8, 9, 10 and 11	In updating the settlement boundaries to reflect recent development which has built and development with planning permission, should we also include new allocations? How should we define settlement boundaries? What types of land uses should be included, such as public open space? Should the approach to using whole curtilages for defining settlement boundaries be retained, or should we take account of physical boundaries which extend beyond curtilages, or limit settlement boundaries to only parts of curtilages? Should settlement boundaries be draw more tightly or more loosely, and perhaps reflecting which tier settlement is within the settlement hierarchy? The current approach to defining settlement boundaries is supported but should be extended to include new allocations.
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12	Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment? Within defined settlement boundaries where the principle of development is established all development should be considered on its merits on a case by case basis.
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13, 14, 15 and 16	Should we have a specific policy for self-build homes? Should be 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? Should self-build housing to be delivered as part of community led development? Could the introduction of a self-build housing policy also be an opportunity for the Council to tackle the issue of climate change? It is considered that a dedicated policy for self-build homes would better respond to the Borough's self-build need.
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	By its nature self-build housing is bespoke and often highly location specific. Requiring a proportion of serviced plots on larger sites is considered to be too blunt an approach to effectively respond to Borough's need and location requirements of self-builders. Policies should encourage developers to offer a proportion of serviced plots on all sites, but it should not be made obligatory. The Borough's self-build need is derived from the number of people and groups on the Council's register. This register is dynamic and will vary over time. It may be that at a certain point in time there is no demonstrable need for serviced plots, but if a policy sets a mandatory proportion of serviced plots then the developer would be obliged to provide these regardless of the fact that they would be surplus to requirements. In addition, even if there were a demonstrable need, the need may not be in the location of the development, which would result in a situation where the plots are made available but not taken up by self-builders. A bespoke policy would be more responsive to the Borough's self-build need. It is considered that self-build housing could be included as an option under existing policy COM9. However, for the reasons set out above, this should not be a mandatory requirement. Self-build housing should not be burdened with any additional sustainability requirements above non self-build housing.
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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.

