



Test Valley Borough Council
Weyhill Road
Andover
SP10 3AJ

Dear Sir/Madam,

Church Commissioners for England – Next Local Plan: Refined Issues and Options Consultation Representations

We write on behalf of our client the Church Commissioners for England (“the Church Commissioners”), who is long-term landowner in the Test Valley Area. The Church Commissioners own considerable landholdings across the country and manage a well-diversified investment portfolio to support this. Test Valley Borough Council (“the Council”) is inviting responses to its Next Local Plan: Refined Issues and Options document (“the Document”) and we are pleased to be given the opportunity to respond.

It is understood that the Council, having received a number of comments in response to the previous Issues and Options consultation held in 2018, has decided to hold a further Refined Issues and Options consultation. This new stage builds on the initial responses and gives further guidance on the direction that the Council will be taking, moving forward. The Document seeks to build upon the outcomes of the initial consultation and also takes account of recent changes and trends. This aims to present further detail in regards to the progress made in preparation of the next Local Plan, prior to the formal stages, which include more detailed and specific policies and proposals.

The Church Commissioners own the site below within the borough of Test Valley. This response is therefore focussed on the key issues within the Document which affect these sites:

- Middlebarn Farm, Chilbolton (“Site 1”)
- Gravel Hill Farm, Chilboton (“Site 2”)

Site 1 - Middlebarn Farm

Site 1 (see Appendix A) measures 0.76 ha and is located to the south east of Chilbolton within a landscape of large arable fields. It is accessed from Drift Road, which leads onto the B3420 and provides access to Chilbolton village. Site 1 contains several disused agricultural buildings of varying ages and forms of construction, none of which are listed.

It is not within a Conservation Area however the Chilbolton Conservation Area is approximately 1.45km north-west of the Site. There are four scheduled ancient monuments within 500m of Site 1.

The Church Commissioners received planning permission (ref: 16/00818/FULLN) on 12 April 2016 at Middlebarn Farm for:

“The conversion of agricultural buildings to form a residential dwelling with ancillary home office space and garage, associated car parking, landscaping and amenity space with the demolition of an un-used building and storage tanks.”

Work has now started on site and the planning permission has been implemented therefore, residential use at Site 1 has already been established. Although the planning permission consented the conversion of agricultural buildings to form one residential dwelling, it is considered that Site 1 has the capacity to deliver more than just one dwelling. Future masterplanning work will identify the capacity of Site 1, taking into account the ecological constraints.

Site 2 - Grave Hill Farm, Chilbolton

Site 2 (see Appendix B) measures 0.2 ha and is located to the east of Chilbolton within a landscape of larger arable fields. It is accessed from Winchester Street, which leads onto the B3420 and provides access to Chilbolton village. Site 2 consists of several agricultural buildings of varying age and design.

It is not within a Conservation Area however the Chilbolton Conservation Area is approximately 875m west of the Site. There are no listed buildings within close proximity to the Site.

There is no relevant planning history for Site 2.

In terms of the capacity of Site 2 for residential development, it is considered that the Site can deliver multiple dwellings. Therefore, future masterplanning work will identify the number of homes that can be delivered on site.

Surrounding Context - Chilbolton

The settlement of Chilbolton, in which both Site 1 and Site 2 (“the Sites”) are located, is typified by residential dwellings. Employment uses in the Village include a dog groomer, a fish processing facility, a local store, a corporate entertainment service, a self-catering accommodation facility and the Abbots Mitre Pub.

The settlement of Winchester is approximately 14km south-east whilst Andover is approximately 7km north-west of Chilbolton.

Next Local Plan – Refined Issues and Options Consultation Document

The Document sets out key matters that the Council is considering as part of preparing the next Local Plan which focuses on four main themes, as identified by the Council, including:

- Living in Test Valley;
- Working in Test Valley;

- Enjoying Test Valley; and
- Community Facilities and Infrastructure.

The following section discusses the key themes which are of relevance to the Church Commissioners and its Sites.

Living in Test Valley (Housing and Communities)

The Document states that meeting future housing needs is one of the greatest challenges for the next Local Plan. The Council has had recent success with its total housing completions exceeding the adopted Local Plan requirement and the requirement figure using the Government's standard methodology. The current Local Plan (adopted January 2016) has a housing requirement for the Borough of 588 dwellings per annum. The Document sets out that this figure has reduced to 550 dwellings per annum using the standard methodology, in accordance with Paragraph 60 of the National Planning Policy Framework (NPPF). In addition, the results of the Housing Delivery Test (HDT) in 2018 and 2019, demonstrate that the Council has delivered 265% and 195% of its housing delivery target, respectively. Since the publication of this consultation, the Government has published the Changes to the Planning System (August 2020) consultation which sets out a different approach to the standard method. There is a transition period so whether this will impact the Council's local housing need figure is dependent on how the Local Plan preparation progresses. If the new approach to the standard method becomes applicable, the housing need in the borough is expected to increase and the Council will need to plan for this increase through more allocations.

The Church Commissioners recognise the Council's success in achieving recent housing delivery targets and encourages the Council to continue to allocate sites for housing to meet the future needs of the community. Paragraph 68 of the NPPF requires a contribution from small sites towards the Local Plan's provision to be a minimum of 10% from sites of 1 hectare or less. The Church Commissioners therefore consider that the Sites can positively contribute to the Council's housing targets, allowing it to maintain its five year housing land supply. In addition, due to the size of the Sites, they can also contribute to the NPPF's requirement for allocating small sites for residential development and can be delivered more quickly than larger sites. In terms of the number of homes that could be delivered, the Sites would be subject to future masterplanning work to determine the capacity of each site.

The adopted Local Plan allocates the Sites as 'countryside' and does not set out any specific allocations for the rural areas of the Borough, although a figure of 36 dwellings per annum is included as part of the housing requirement for Northern Test Valley (NTV). The Document sets out that the next Local Plan will consider the future scale of growth for the rural area and the strategy options for housing development. The Church Commissioners support the Council's approach to developing a strategy for housing development in rural areas, in accordance with Paragraph 78 of the NPPF which states *"to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities"*.

The Church Commissioners consider that housing located in rural areas has an important role to play in delivering sustainable development to support local rural communities, where housing supply is often limited. Therefore, as part of the Council's emerging strategy for rural areas, the Church Commissioners encourage the Council to promote smaller, sustainably located sites, such as the Sites, for residential development.

The Document sets out that the new Local Plan will review the current settlement hierarchy with the approach of defining settlement boundaries. It is understood that in the adopted Local Plan there are currently four hierarchies. These include: Major Centres, Key Service Centres, Rural Villages and Countryside. The Sites are located within Chilbolton which is classified as a 'Rural Village' however, both Sites are located outside of the settlement boundary, with Site 2 located approximately 200m east of the boundary itself.

The Church Commissioners consider that settlement boundaries are restrictive in bringing development forward on sustainable sites if these are located outside of the fixed boundary. Therefore, the Church Commissioners encourage the Council to consider a more flexible approach to settlement boundaries. This is also recognised within the Planning for the Future White Paper which proposes that land should be classed within one of three zones, being "Growth" areas, "Renewal" areas and "Protected" areas. For the Growth category specifically, it is proposed that this would include land suitable for comprehensive development, including new settlements and urban extension sites, as well as land at the edge of existing settlements.

This is particularly important for sites such as Site 2, as development on this site would be restrictive as it is located outside of the settlement boundary, despite it being a small, sustainably located site, just 200m from the settlement boundary. This would allow a greater variation of housing to come forward, particularly as with the current climate as a result of the COVID-19 pandemic, there is an increasing trend for individuals to choose to live in more rural locations.

Enjoying Test Valley (Environment and Quality of Life)

In accordance with Paragraph 124 to 132 of the NPPF which sets out that good design is a key aspect of sustainable development, the Council acknowledges the importance of design-based policies in the next Local Plan. The adopted Local Plan does not include any density standards. The Church Commissioners suggest that this approach is carried forward to the next Local Plan as this will allow for a policy-led approach to design and highlights the importance of making effective use of land. This is in accordance with the Paragraph 117 of the NPPF which states "*planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses*".

The Document notes that climate change is one of the biggest challenges faced in the district and as such, climate change needs to be embedded in all policy areas in the next Local Plan. This accords with national planning policy which requires strategic policies to make provision for climate change mitigation and adaptation (Paragraph 20, NPPF). The Church Commissioners believe the most appropriate way to deliver climate change policies is for them not to be prescriptive and allow flexibility. For example, small scale developments, of which Site 1 and 2 would be classed as, can present different constraints to implementing sustainable construction and renewable energy technologies in the design. Therefore the Church Commissioners recommend that Council takes into consideration the scale and type of development when preparing more detailed policies for these requirements.

In line with Chapter 15 'Conserving and enhancing the natural environment' of the NPPF, the Document states that the next Local Plan will need to account for biodiversity more widely. This will be achieved through setting out policies which accord with legal requirements and national policy. The adopted Local Plan sets out that habitats and species will be protected and development likely to impact biodiversity will not be permitted. In accordance with adopted policy, planning permission (ref: 16/00818/FULLN) was supported by an Ecology Statements which proposed a number of biodiversity enhancement measures at

Site 1. By implementing these mitigation and precautionary measures, it is identified that the development is not considered to have any significant residual effect on the importance of ecological features/species within or adjacent to Site 1.

The Church Commissioners understand the importance of conserving ecological networks in order to safeguard them. This is evidenced in the biodiversity enhancement measures implemented at Site 1. As such, the Church Commissioners would support a flexible approach to policy which allows sustainable development to come forward, with the relevant mitigation implemented to alleviate any potential harm to the natural environment and enhances biodiversity in line with national policy.

Infrastructure and Community Facilities

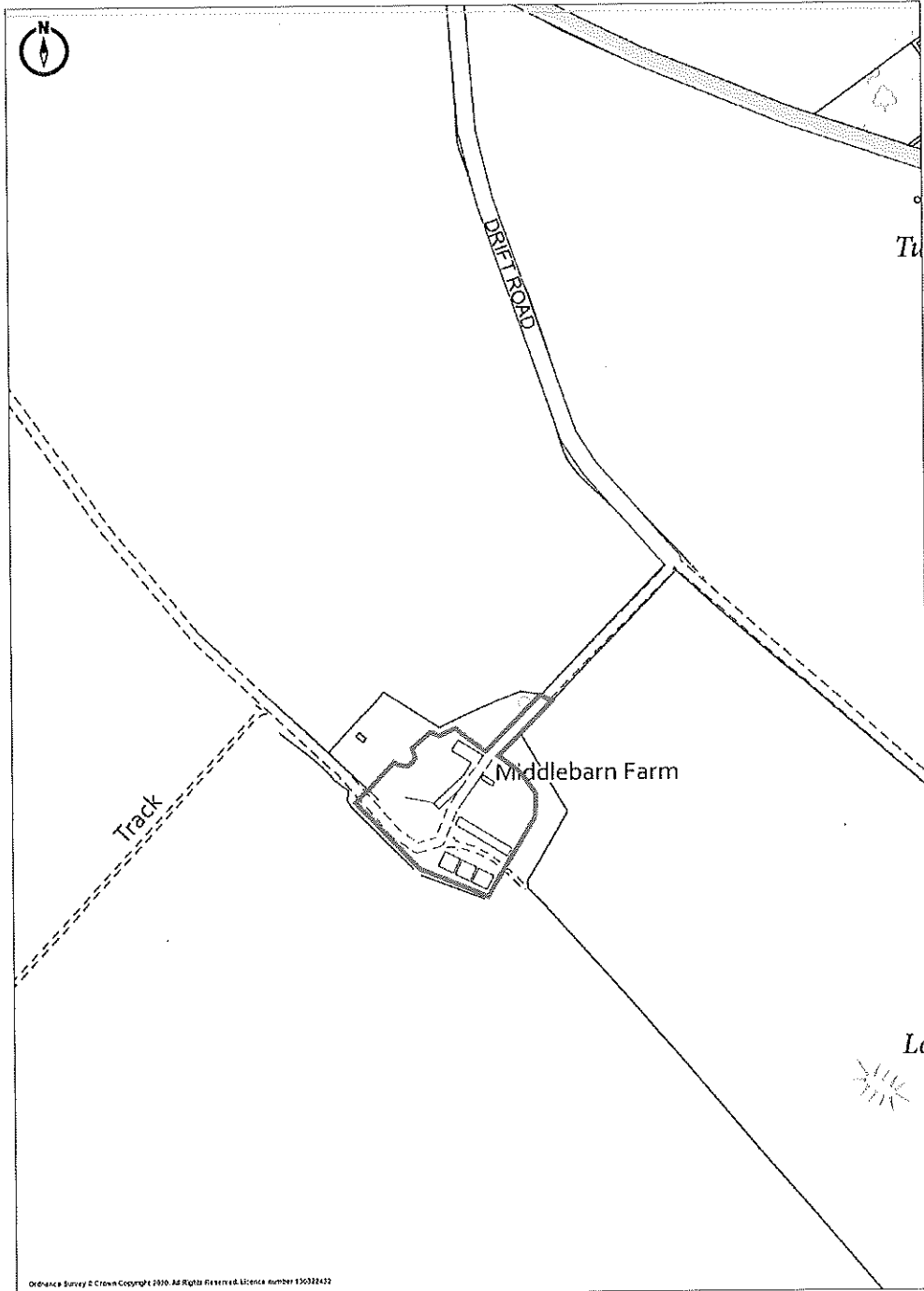
The Document states that the next Local Plan will need to ensure it provides flexibility to support alternative technologies and the infrastructure needed to support these alternative technologies, including Electric Vehicle Charging Points (EVCPs) and their associated infrastructure. The Church Commissioners support the Council's commitment to supporting sustainable transport technologies however, asks the Council to consider that not every person/s who acquire a new residential property will require an EVCP. As such, the Church Commissioners suggest that the requirement for infrastructure provision to support EVCPs to be installed by a future occupier, as opposed to the developer, would be much less restrictive and allow more development to be delivered.

Conclusion

The Church Commissioners are pleased to have the opportunity to provide comments in relation to the Test Valley Refined Issues and Options Consultation. The Church Commissioners are supportive of the key principles of the Document and would request that the Sites are considered for residential development in the emerging Local Plan. The Sites would make a valuable contribution to the housing supply in Test Valley and will aid the Council in meeting the national requirement of 10% of housing allocations to be small development sites. The Sites would be subject to future masterplanning work to identify the capacity of Site 1 and Site 2 to determine the number of homes that could be delivered across the Sites.

Appendix A

Site Location Plan: Middlebarn Farm

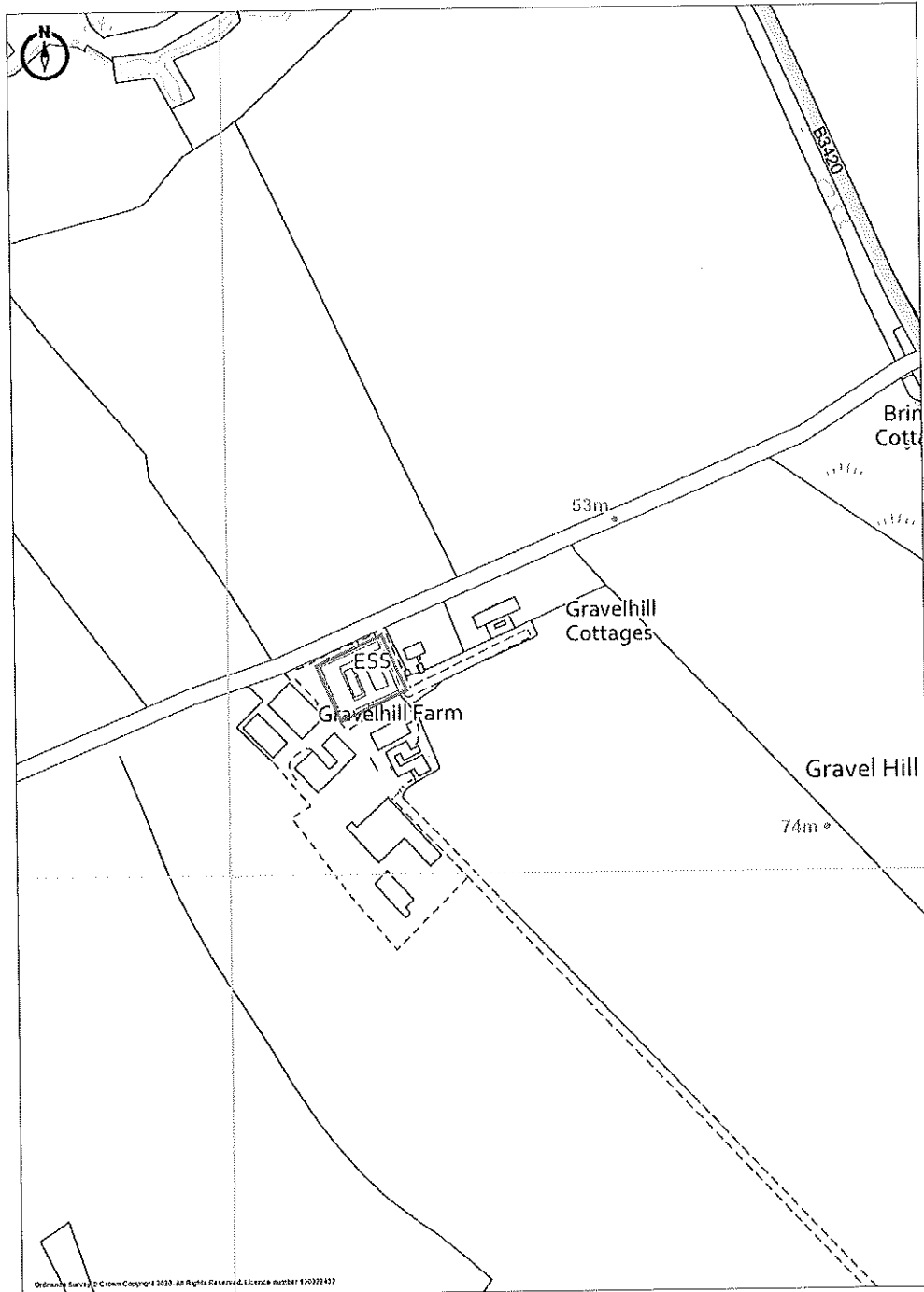


Promapv2
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Appendix B

Site Location Plan: Gravel Hill Farm



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Promapv2
LANDMARK INFORMATION

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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* <i>(If responding on behalf of an organisation)</i>			

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:

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 6 months 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
	Please refer to accompanying cover letter.

Please use next page if necessary

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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.