

# 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](http://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](http://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
	<p><b><u>Andover &amp; District Branch Liberal Democrats Response to TVBC's June 2020 Issues and Options Consultation Paper</u></b></p> <p>We have provided answers to the set questions posed by the consultation document at the end of this document. There are also comments on the document itself, which were encouraged. These comments are important as generally felt that the set questions were limiting.</p>
2	<p><b>2 Context</b></p> <p>As well as the turmoil caused by Covid-19, there is considerable uncertainty about the future form of local plans caused by the publication of the government's proposed planning reforms announced this month. To avoid uncertainty, we have responded to this consultation only in the light of current planning guidance.</p> <p>Climate change is the most important consideration for future planning. However, it is also important to consider the natural capital of the borough (water, wildlife, air quality, undeveloped land) and consideration of this should underpin all thinking and implementation of planning policy.</p> <p>We concur that town centres are important and that active planning steps are needed to maintain their vitality and viability.</p> <p>We believe that sustainability needs to be redefined so that we do not impact or constrain on the choices of future generations, in particular with respect to climate change. We suggest something along the lines of:</p> <p style="padding-left: 40px;"><b>"Sustainable development is development</b> that meets the needs of the present without compromising the ability of future generations to meet their own needs. It puts equal importance on each one of environment, economy and society." (Brundtland Report 1987).</p>
5	<p><b>5 Living in Test Valley (Housing and Communities)</b></p> <p>We are of the view that Test Valley needs a significant increase in appropriate infrastructure before we consider more housing. More housing needs to be affordable, and we accept the fact that the definition of</p>



	<p>affordable does not satisfy the needs of most of our residents. However we recognise that central government is highly likely to impose its own housing target on the borough. The task of TVBC should therefore be to try to match the provision with what is needed in terms of location, size and affordability. TVBC should definitely not be bidding for more housing than the government specifies.</p>
5.11 et seq	<p>5.11 et seq Housing distribution</p> <p>We support moves to allocate more housing to the villages, rather than to just Andover and Romsey. A settlement hierarchy will help identify which villages can support/need more housing. As well as facilities and services in the villages, in drawing up the hierarchy consideration should be given to the amount of in/out commuting to/from the villages. It should also be recognised that the Covid-19 crisis looks certain to result in more working from home, which could result in more opportunities for local facilities to thrive. See also our answers to Q4, Q5, Q6 and Q7.</p>
5.25 et seq.	<p>5.25 et seq. Settlement boundaries</p> <p>These should be made more permeable for council-funded or community initiated affordable property construction, but not for private market housing. See also our answers to Q8 to Q12.</p>
5.30 et seq.	<p>5.30 et seq. Housing Mix and Affordable Housing</p> <p>TVBC should embrace two of the measures recommended by the Affordable Housing Commission (AHC) – “Making Housing Affordable Again: Rebalancing the Nation’s Housing System Making Housing” published in March 2020. Two major recommendations from the AHC are to:</p> <p>(1) Redefine affordable housing to reflect incomes not market prices. The Commission proposes a new definition and alternative measures of housing affordability, focused on incomes and personal circumstances, rather than market prices. So that homes would be defined as affordable if they consumed no more than 35% of net household income for lowest quartile income groups in each local authority area. In the next SHMA TVBC should use this definition as well as that in the current NPPF.</p> <p>(2) Focus on the social rented sector. The Commission highlights that the most striking change in housing over recent decades is the more than doubling in the size of the Private Rental Sector (PRS) – up from less than one in 10 homes to around one in five, in just 20 years. Meanwhile the social housing sector has halved from its peak and shrunk from being three times the size of the PRS to appreciably smaller than it. CPRE believes that TVBC should embrace the concept of council-funded housing to boost the supply of social rented homes.</p>

	<p>We support the comments of CPRE in this area.</p> <p>There seems little point in the SHMA attempting to determine the numbers of dwellings required if government is going to impose its own standard method algorithm on the borough and in this connection TVBC should lobby MHCLG to use the most up-to-date ONS projections (2018-based) in their current review of the Standard Method. However, the SHMA does have an important role in determining the amount and distribution of affordable housing. What is needed is an assessment of the need in different affordability bands. The plan then needs to determine how these are going to be provided. Again the SHMA should use the latest ONS household projections.</p> <p>The last SHMA estimated that 292 new affordable dwellings per year were needed whereas TVBC admit (para. 5.30) to delivering around 200 pa. So ways of increasing the supply (probably, depending on output of the next SHMA) need to be found, especially in the light of the fact that there are also around 2,000 on the housing waiting list.</p> <p>The latest NPPG (Sept. 2019, Paragraph: 023 Reference ID: 23b-023-2019090) states that LPAs can set their own threshold in rural areas. In our view affordable housing should be sought on all rural sites accommodating 3 or more dwellings to be compatible with the current overall TVBC aim of around 1/3 affordable. Developments in rural areas are often highly sought after and we see no need for the proportion of affordable housing to be reduced with development size in designated rural areas. It is also surely highly undesirable that affordable housing in a small development should be replaced by a financial contribution. The affordable houses are needed in the particular rural community, to keep diverse and provide local accommodation for those in need, not in some nearby town.</p>
<p><b>6</b></p> <p>6.1 et seq.</p>	<p><b>6      Working in Test Valley (Town Centres and Local Economy)</b></p> <p>6.1 et seq. Town centres</p> <p>Covid-19 is could impact on the viability of town centres as it likely to lead to a permanent reduction in the footfall in some shops with more people opting to buy goods on-line. We endorse the view (I&amp;O para. 6.2) that town centres are likely to move away from being solely retail-led locations to those which offer a wider range of amenities. We endorse many aspects of the Hemmingway plan and also suggest the following measures to improve the vitality of town centres:</p> <p>(1) business rates and rentals need to be more flexible to stimulate uptake,</p>



<p>6.7 et seq.</p>	<p>(2) do more to bring out of town centre shopping into the centre e.g. by giving less permissions for out of centre retail and equalising parking charges between out-of-centre and in-centre car parks, and</p> <p>(3) have policies which encourage more people to live in or close to the town centres (however, parking provision should be made mandatory). This will directly boost retail trade, boost the evening economy, reduce car use and help minimise greenfield development.</p> <p>6.7 et seq. Tourism.</p> <p>See our responses to questions 17 and 18.</p>
<p>7</p>	<p><b>7      Enjoying Test Valley (Environment and Quality of Life)</b></p> <p>Natural capital and environmental services must underpin decisions in this policy area.</p> <p>South Hampshire Green Belt</p> <p>We support CPRE in this area and are also disappointed to see no reference to the proposed South Hampshire Green Belt in this report. Green Belt, we believe, is currently the only effective way to prevent urban sprawl in South Hampshire and strongly believe that the exceptional circumstances needed for the designation of a green belt exist in South Hampshire.</p> <p>There is a strong public feeling towards the green spaces on their doorsteps. CPRE has collected over 14,000 signatures on a petition to establish a Green Belt. The Covid-19 pandemic has emphasised that people depend on the countryside for their mental and physical well-being more than ever.</p> <p>We are also facing a Climate Emergency and we know that the countryside plays an important part in mitigating climate change. In 2019 CPRE commissioned NEF Consulting, to write a report exploring the Socioeconomic and Environmental Value of the Green Belt area, see <a href="https://www.cprehampshire.org.uk/wp-content/uploads/sites/3/2020/06/NEF-Consulting-Introducing-a-South-Hampshire-Green-Belt-Study-June-2020.pdf">https://www.cprehampshire.org.uk/wp-content/uploads/sites/3/2020/06/NEF-Consulting-Introducing-a-South-Hampshire-Green-Belt-Study-June-2020.pdf</a></p> <p>The report looks into three elements;</p> <ul style="list-style-type: none"> <li>• Health and Well-being</li> <li>• The Economy (including recreation)</li> <li>• The value of nature and ecosystem services, for example carbon sequestration.</li> </ul>

	<p>The main message is that the countryside has a quantifiable value in its own right. It is also a crucial part of our armoury against climate change.</p>
7.12	<p>7.12 Gaps</p> <p>Gaps, local or otherwise, are much valued by local communities and serve a useful purpose in maintaining the separation of settlements, particularly the separation of villages from nearby large towns. As well as helping foster feeling of community within villages, the gaps also have an important and overlooked role as wildlife corridors. So policies should maintain significant gaps between settlements, even when not named gaps and even if the NPPF makes no mention of gaps.</p>
7.15	<p>7.15 Local green spaces</p> <p>These are identified in Neighbourhood Plans and Village Design Statements and should be protected by policy as they are important to local communities.</p>
7.26	<p>7.26 et seq Sustainable construction and renewable energy</p> <p>Zero carbon housing should be the aim, to be specified by policy, and policies favouring low carbon and renewable energy sources should specified now rather than waiting for government 2025 building regulations.</p>
7.31	<p>7.31 Biodiversity</p> <p>Wildlife connectivity networks are essential and, as noted above, will be enhanced if local gaps are supported.</p>
7.33	<p>7.33 Biodiversity net gains</p> <p>These must be natural habitat gains and not just species count gains which e.g. could allow flowers in gardens to outscore cereal fields.</p>
7.34	<p>7.34 Protection of special habitats etc.</p> <p>Nitrates, and their effect on rivers and the Solent, are an important issue and TVBC's intentions here need clarifying and strengthening. Nitrate mitigation measures must relate to the same catchment and not nebulous mitigation many miles away.</p>
7.35 -7.39	<p>Public Open Space and Green Infrastructure. 7.35 -7.39</p> <p>We would like to see the amount of public open space provided by developers for developments with Test Valley Borough Council. Presently</p>

	<p>there is not enough public open space within the borough for the number of residents. The public open space comprises land for children's play space, play parks, sports facilities and allotments. The land allocated to allotments is 0.2 hectares per 1000 residents. During the time of covid19 it has become apparent how important public open space and allotments have become for the mental wellbeing and physical wellbeing of residents. New developments of houses and flats have meant that people do not have access to large gardens and there has been more requests for allotments, as people are wanting to grow fresh vegetables. We would request that the allocation of allotment land is increased from 0.2 hectares to at least 0.5 hectares or more.</p>
7.35 et seq	<p>7.35 et seq Public open space</p> <p>The Covid-19 crisis has highlighted the importance of public open spaces and opportunities for informal recreation. With careful thought such spaces can also contribute environmental benefits (e.g. the pollinator strips and wildflower areas at Picket Twenty).</p>
7.39	<p>7.39 Trees</p> <p>In urban locations tree planting can help mitigate carbon emissions and also improve air quality; in rural and semi-rural locations increasing tree cover is an important part of maintaining biodiversity. Consideration should be given to introducing Miyawaki Forests into TVBC.</p>
7.40	<p>7.40 et seq Water supply and quality</p> <p>We share CPRE's concerns over water supply, and support their view this part of Issues and Options needs to be considerably strengthened. Water sustainability in Test Valley depends on correct management of water resources (aquifers) and surface stores (streams, rivers).</p> <p>The natural water capital must be protected and issues of water supply and waste water disposal cannot just be passed on to Southern Water. There will be no additional water sources available and rainfall inputs are likely to be few and heavier resulting in less infiltration to the aquifers and TVBC should plan accordingly. No reliance should be placed on putative imports from other areas which in any case are examples of robbing Peter to pay Paul. The sewage treatment plants at Fullerton and Chilbolton are near capacity and, in any case, are already leading to a decline in the water quality of the Test, notionally one of the UK's most iconic rivers (see <a href="https://www.salmon-trout.org/2018/12/17/test-itchen-report">https://www.salmon-trout.org/2018/12/17/test-itchen-report</a>).</p> <p>Ways of reducing demand, not just limiting the impact of new development, must be investigated e.g. promoting the use of grey water systems which have the potential to considerably reduce domestic demand for water. Groundwater protection is vital and stronger controls of</p>



8	<p>domestic and industrial liquid waste are needed. BREEAM “excellent” standard must be insisted on and enforced without any ‘if financially viable’ get out clauses. If TVBC cannot initiate water saving measures then new development is not sustainable.</p>
	<p><b>8 Infrastructure and Community Facilities</b></p> <p>We support moves to increase facilities for walking and cyclists and we hope that TVBC will work with HCC to prioritise walking and cycling infrastructure. Alternative transport should be designed into new developments from the start. It would be better to fund transport systems that last rather than to give subsidies to transport operators.</p> <p>EV charging: there is a need for public and domestic charging points for electric vehicles as the use of petrol and diesel fuel is phased out. These need to be designed and implemented directly into any new developments and there has to be a planning framework to allow introduction of charging points to older houses and for those areas which only have on-street parking. In the longer term, TVBC may need to consider infrastructure for alternatives including fuel cell vehicles.</p>
	<p><b><u>Questions - Refined Issues and Options Consultation for the next Local Plan</u></b></p> <p><b>1</b></p> <p>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?</p> <p>(a) No (b) No (c) Yes</p> <p><b>2</b></p> <p>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?</p> <p>Yes, sample Andover, Ludgershall and Tidworth.</p> <p><b>3</b></p> <p>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?</p> <p>No</p>

4	<p>4) Should the number steps of the settlement hierarchy be increased, for example by sub- dividing the 'rural villages' into two separate tiers?</p> <p>Yes. For example, there should be more than one tier for the rural villages.</p>
5	<p>5) How should we decide which settlements to include within each step of the settlement hierarchy?</p> <p>Categorise them on the basis of points system driven by the services and infrastructure that the settlement has, i.e. station, doctor's surgery, primary school, secondary school and A-roads.</p>
6	<p>6) Should we consider groups of rural settlements together, where these are closely related to each other and/or share facilities and services?</p> <p>Yes.</p>
7	<p>7) How should we treat rural settlements which are close to other larger settlements and can therefore also easily access their facilities and services?</p> <p>As satellites.</p>
8	<p>8) In updating the settlement boundaries to reflect recent development with planning permission, should we also include new allocations?</p> <p>Yes</p>
9	<p>9) How should we define settlement boundaries? What types of land users should be included, such as public open space?</p> <p>Need to include amenities and public open spaces.</p>
10	<p>10) 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?</p> <p>We should be using physical boundaries.</p>
11	<p>11) Should settlement boundaries be drawn more tightly or more loosely and perhaps reflecting which tier settlement is within the settlement hierarchy?</p> <p>Status Quo. A more permeable settlement boundary may be appropriate in certain cases but development within permeable boundaries should be limited to affordable housing, except in the situation when a housing target</p>

	is allocated to the parish on account of its position in the settlement hierarchy.
<b>12</b>	<p>12) Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment?</p> <p>Yes</p>
<b>13</b>	<p>13) Should we have a specific policy for self-build homes?</p> <p>Yes</p>
<b>14</b>	<p>14) Should 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?</p> <p>Yes</p>
<b>15</b>	<p>15) Should self-build housing to be delivered as part of community led development? Yes</p>
<b>16</b>	<p>16) Could the introduction of a self-build housing policy also be an opportunity for the Council to tackle the issue of climate change?</p> <p>Yes but all houses should be subject to climate change requirements.</p>
<b>17</b>	<p>17) Should a revised tourism policy be more flexible for potential new tourist attractions?</p> <p>Yes</p>
<b>18</b>	<p>18) Should a revised tourism policy be more supportive of innovative proposals?</p> <p>Yes</p>

*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.