

LOCAL PLAN REFINED ISSUES AND OPTIONS

Question 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?

We support option 1a – retaining two HMAs with a revised northern boundary. The additional land area to the north should be designed to enliven Southern Test Valley [STV] small towns and villages with essential new housing. This change must reflect HMA methodology requirements associating work and homes. Evidence will be generated by a Dominant Town study looking at the relationship of the Borough with Southampton, Winchester, and Salisbury - a requirement identified by the Romsey Future Project. The areas proposed to be incorporated into STV should include Awbridge, Braishfield, Lockerley, Michelmersh, Mottisfont, Wellow, Sherfield English and Melchet and Plaitford.

Question 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?

In the Issues and Options consultation document issued by TVBC in July 2018, it is reported that 42% of residents in Test Valley work outside the borough. On this basis we would suggest that the definitions of HMAs should indeed take into account the large number of commuting journeys to major employment centres outside the Borough.

Question 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?

No. Unless strong local evidence should emerge that typically two parishes actively want to be considered together.

Question 4

Should the number steps of the settlement hierarchy be increased, for example by sub-dividing the 'rural villages' into two separate tiers?

No. In the absence of a very strong case we favour the motto 'Keep it simple'.

Question 5

How should we decide which settlements to include within each step of the settlement hierarchy?

'Promotion' from the Rural Villages category to Key Service Centre should be considered if any existing Rural Village wants it, based on community evidence or adopted Neighbourhood Plan, we would not favour any 'demotion' however.

Question 6

Should we consider groups of rural settlements together, where these are closely related to each other and/or share facilities and services?

Settlements such as villages should be considered for any future planning proposals, including housing allocations or settlement boundaries, as separate entities and not grouped together. Even adjacent villages usually have some physical undeveloped space between them which is considered as an important element that helps distinguish one settlement from another. That resultant physical separation should be maintained and their individual identity protected. The resistance to promoting the merging of settlements has generally been encouraged and this should be maintained.

Such groups of rural settlements may well share facilities and services, such as shops, schools and public houses etc. There is no justification to assume and plan their future as one group rather than of separate villages so as to enable small development of (say) additional housing for each village to meet the needs of each separate settlement.

Question 7

How should we treat rural settlements which are close to other larger settlements and can therefore also easily access their facilities and services?

Despite any access and use of facilities and services in a main settlement by occupiers of close by rural settlements, those rural smaller settlements should be treated separately in planning terms, particularly on the issue of additional housing in order that a local provision can be made in the outlying settlements rather than them having to rely on large housing developments outside of and beyond the local villages. A more even distribution and provision of housing in proportion to the size of the host settlements should be encouraged. For example, villages such as Braishfield or Ampfield or Wellow should not have to rely on new housing in Romsey for any necessary additional housing to meet their future housing needs. This suggested approach may also encourage the continued life of the few existing remaining local facilities such as a local shop or a public house if some measure of new local housing allocation can be provided in these smaller villages.

Question 8

In updating the settlement boundaries to reflect recent development which has built and development with planning permission, should we also include new allocations?

The present settlement boundaries are restrictive and inhibit potential opportunities for the gradual growth of communities in the countryside.

The problem with extending settlement boundaries is the implied opportunity to add value to land that hitherto could not be built upon as opposed to any localised penetration of the defined boundary for development based upon merit and local consent.

Updating the settlement boundaries should include new allocations to improve community sustainability provided that a flexible approach is adopted to assess other opportunities that may be worthy and deserving of consideration.

As a consequence of the current pandemic it is possible that there may be demographic changes leading to more home-based working. This could lead to greater sustainability for local communities.

Question 9

How should we define settlement boundaries? What types of land uses should be included, such as public open space?

An appraisal of land necessary to sustain a local community, village or hamlet should be undertaken in the context of allowing a degree of development dispersal in the hinterland of major centres. The provision of public open space, community orientated facilities and limited expansion within the physical topography of a settlement should be part of a broader planned strategy.

Question 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?

There are situations where a curtilage extends beyond the settlement boundary and therefore cannot be developed upon. Extending the settlement boundary to incorporate the curtilage may lead to inappropriate and unwelcome 'backland' development in the countryside. This anomaly needs to be rectified and the policy amended to be part of a revised strategy.

However, on balance, settlement boundaries do need to be extended and should be related to physical borders confines and limits which include a curtilage. The concept of going beyond any extended settlement boundary should only be perforated in exceptional circumstances where there is merit to do so.

Question 11

Should settlement boundaries be drawn more tightly or more loosely, and perhaps reflecting which tier settlement is within the settlement hierarchy?

Settlement boundaries should be loosely drawn and related to physical characteristics although the major centres should see their size limited so they do not become sprawling entities.

Settlements outside the major centres should be recognised as the hinterland of Romsey and Andover contributing to the social and economic success of a broader community. Rather than expanding the major centres any further outlying village communities should be included in a new settlement hierarchy that respects their unique qualities yet affiliated in a more strategic overarching policy.

In answering this question, we see Stockbridge as a hybrid sub-centre that supports the villages in its immediate hinterland. It is also a centre with a unique social and tourist economy which is a niche quality worthy of special recognition.

Question 12

Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment?

Yes

Self Build and Custom Build Housing

Question 13 Should we have a specific policy for self-build homes?

It is RDS's view that a policy for Self-Build and Custom Build Housing (SBCBH) should be included for the first time in the next TVBC Local Plan.

However, there is very little data available that could help inform this policy. For example, although 153 individuals and 1 group have registered an interest since 2015 on the TVBC Self-Build Register (which local authorities are tasked by government to maintain), no-one has acquired a serviced plot of land through this approach. There is consequently no borough data on plot size/location, or indeed consequent planning applications and building control. Furthermore, the SBCBH section in the Local Plan consultation document indicates other data collected in the first stage of the consultation, for example developer responses, that is not known.

There does appear though to be an argument and anecdotal evidence to justify a policy. This includes:

- facilitating self-builders and community-led self-build schemes at a time of housing shortage
- ensuring a reasonable balance between the conflicting demands of volume and self-builders in the provision of serviced plots
- there are numerous builders who offer their services for self-build

With reference to what is being considered by TVBC moving forward:

1. ***“in preparing and maintaining this register, the Council are not currently looking to bring forward self and custom build plots on land within its control”***. In RDS’s view, this is not helpful to self-builders.
2. ***“The Council are considering what options are available in meeting the evidenced demand during the next Local Plan”***.
3. The Planning Policy Team ***“have undertaken a call for sites to prepare the Strategic Housing and Employment Land Availability Assessment (SHELAA) for Test Valley. Some sites promoted by landowners include the opportunity for an element of self-build housing - see link below for more information”***
<https://www.testvalley.gov.uk/planning-and-building/planningpolicy/evidence-base/shelaa-review-2019>. This is potentially helpful, although should there be a mechanism to ensure self-builders on the TVBC Self-Build register are alerted to available sites? Otherwise, other than legislative, it begs the question of what is the point of the register? It is also less helpful to self-builders that ***“The SHELAA only identifies sites with development potential, it does not allocate sites”***.

In conclusion, it is RDS’s view that SBCBH planning applications should not be treated differently with respect to core planning and building control requirements. It is also important to focus policy on facilitating self-build for those TVBC residents that struggle to find their own home in our TVBC communities rather than the “Grand Designs” end of the spectrum.

Question 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?

This should be a helpful policy for facilitating self-builders. Factors such as what these proportion(s) should be in relation to the potential demand, informing self-builders of this availability etc would require careful consideration.

Question 15 Should self-build housing be delivered as part of community led development?

There is some evidence of probably a relatively small number of nationwide community/group led multiple housing unit self-builds. Facilitating more community led development could therefore make a significant contribution to tackling the housing crisis.

Question 16 Could the introduction of a self-build housing policy also be an opportunity for the Council to tackle the issue of climate change?

Probably yes. It may well be that some self-builders achieve high levels of sustainability and innovation in their builds which surpass current building standards. This could be a contribution to tackling climate change.

Question 17

Should a revised tourism policy be more flexible for potential new tourist attractions?

Given the challenges faced by town centres due to the growth in internet shopping, the policy should be to encourage attractions which will increase footfall in town centres.

Question 18

Should a revised tourism policy be more supportive of innovative proposals?

For new attractions to be commercially viable, innovation should clearly be encouraged. The benefit achieved should, however, not just be in the form of attendance numbers but also the side benefit to the existing infrastructure.

ENERGY ISSUES IN NEW BUILD HOUSING

DESIGN.

There is an inherent failure to recognise the importance of good design. New estates for example, never achieve the ambitions of the fine words in the Local Development Plan. In general, the same applies to smaller developments and even inappropriate extensions to dwellings.

Despite the call for Design statements they are often seen as just a box ticking exercise to satisfy planning application requirements by those least qualified to make any judgement on what is good or bad. It will be interesting to see the Government's review of design considerations in planning.

National Policy can only be an aspirational guide for local planning authorities. The difficulty is conveying that intention to ensure that local policies have the teeth to make sure higher standards of design, innovation and local distinctiveness can be achieved by the authority with the skills to make the right design judgements. With the potential overhaul of the planning system and hints that the Government wants to speed up the planning process by granting 'permission in principle' to major developers, the Council will have to tighten consents to ensure good design is a prerequisite.

The LA should encourage local communities to prepare strategic plans for shaping the future of their town or village in all-embracing design statements. They should promote a unique quality lifestyle that befits a specific location, plans essential infrastructure, and controls the way a community expands. There should also be a mechanism in place to reserve areas for 'self-build' that has the scope to raise the design bar with innovation and variety

There are instances where design codes may have the benefit of at least ensuring a minimum design standard is achieved. However, they should not be interpreted as just meeting a standard that is 'deemed to satisfy'. There must be an emphasis towards going beyond such a minimum to seek creative and innovative improvements to the living environment that are planned in both two and three dimensions. Designing something that is so called 'in keeping' will simply not do.

Design is based on spatial awareness. The quality of buildings, their layout, the pattern of development, landscaping etc are all embodied in an understanding of the benefits a good design achieves. Every development should be an expression of an educated concept that puts into context an appreciation of a setting, the creation of an attractive built environment, the wise utilisation of space, all wrapped in the variety of form, orientation, topography, materials, enclosure and light.

Density should not be a prescribed expectation. Intelligent design can cater for both high and low density developments depending on location, topographical features and the creation of essential amenity space. A criticism of recent residential developments is the poor random nature of the layouts of estates, the characterless lack of identity, cluttered roads and inadequate provision for the motorcar.

Irrespective of the density standards it is important to promote a quality of living that incorporates all the sustainable virtues of ensuring people enjoy a sense of place where they live, have adequate private and defensible amenity space, and feel part of a cluster of dwellings that creates a neighbourhood.

CONSTRUCTION STANDARDS

It is not a question of just meeting the challenge of reducing emissions but more an issue of firstly ensuring buildings being highly efficient in their construction with a progressive and innovative approach to well exceed the current Building Regulations. There should already be a requirement for super insulated homes capable of harnessing all heat sources with air-tight construction and mechanically controlled ventilation.

This is best illustrated by the Passivhaus Standard which sets a high bar to dramatically reduce the requirement for space heating and cooling by constructing a high performance thermal envelope utilising passive solar gains and internal heat sources.

In the main, present day construction will remain relatively inefficient until Building Regulations are updated to a much higher standard. There are mechanisms already in place with SAP (Standard Assessment Procedure) rated construction, a holistic SAP, which exceeds the current Building Regulations (Part L) by some 15-20%. They assume more innovative and onerous standards of construction that take into account the performance of every component part of a building. The corollary of that is prefabricated construction where there is accuracy and quality control.

The next Local Plan should address all the foregoing issues with a clear demand for reducing the reliance on fossil fuels. For there to be significant strides to improve energy efficiency buildings will look very different. The Plan must promote and accept a new aesthetic that includes different materials, solar panels designed as an integral part of the roof, the positive use of glass for passive gain and heat recovery, solar shading in summer, buildings set into the ground to control thermal storage with grass roofs, and waste water recovery and treatment.

These are changing times to be embraced. Planning needs to take the lead in these changes by making sure that planning permission becomes conditional on designs that meet the sustainability objectives.