



The countryside charity
Hampshire

CPRE Hampshire, Test Valley District Group

Acting Chair - John Moon [REDACTED] Tel:

[REDACTED] Email [REDACTED]

Secretary - [REDACTED]

[REDACTED] Tel: [REDACTED]

Email [REDACTED]

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Local Plan 2040 Reg.18 Stage1 February 2022 - Response by CPRE Test Valley

Chapter 1: Introduction

1.11

Can it really be concluded that the adopted local plan is up to date when we now have different housing market areas and different housing targets? The status of the current local plan is relevant to the decision-making process in drawing up the new plan.

Chapter 2: Vision, Key Challenges and Objectives

TVBC in producing this new local plan has missed an opportunity to develop a document grounded in an understanding of the issues facing the Borough: the unaffordability of housing particularly in the rural parts of the Borough, the stresses on the natural environment in terms of water supply, water quality, the decline in biodiversity, the pressures on vulnerable habitats such as the River Test, New Forest and The Solent, the health and well-being of its residents, the pressure for development in the area of the Borough adjoining Southampton and Eastleigh, and the impact of the recent movement out of towns and cities prompted by the pandemic.

2.21 Vision statement

The vision statement in 2.21 is very aspirational and similar to one which is found in many local plans, including the last Test Valley local plan. As drafted it is difficult to criticise any of the aims, but unless the following sections set out what the targets are for each element, the vision is of limited practical value.

The vision statement does not adequately reflect the unique landscape of Test Valley and the economic and cultural need to preserve it. The landscape may not attract many national designations, but its chalk rivers and streams are a rare international resource; the contrast between the green wooded valleys of the Test and its tributaries and the open chalk downland with the villages located on the valley floor away from the higher ground is an important feature. The whole of the course of the Test is a SSSI and specific areas within the valley also have a European SAC designation and both emphasise the importance of the river to wildlife. The river also has an international reputation for the clarity of its water and the quality of its fisheries. Preserving the iconic nature of the Test Valley should be the paramount aim of the plan.

2.22

In our opinion the statement here is the wrong way round. Suggest that it should read: 'The Vision prioritises the protection and enhancement of our precious and unique natural assets and distinctive heritage, which our

communities highly value, while delivering the homes, employment and supporting infrastructure that will be needed to support our community's requirements.'

Chapter 2 General points

The vision paragraphs make no reference to the concepts of natural capital and ecosystem services; these metrics are not used in any of the sustainability appraisals which, in each case, should include environmental and social impacts but economic considerations tend to dominate.

Thriving agriculture, valuable recreation and tourism, especially fishing, and landscape value all flow from consideration of the natural capital and ecosystem services (soils, geology, climate, water, topography, biodiversity) but are not made central to the character of the borough as perceived in the draft plan.

In setting the scene to deliver sustainable development TVBC does not reference what one would consider to be an obvious the starting point i.e. the current state of the environment and the health and well-being of the residents. The Scoping Report 2020 published by TVBC which was prepared as part of the sustainability appraisal, provides a sound basis for developing the new plan in terms of baseline information, yet it appears not to have been used in any appraisals.

There is little reference to TVBC's position on design codes which the NPPF advises LPAs should prepare (NPPF para 128). If TVBC is serious about maintaining the character of the area then design codes should have a key role to play.

Ten objectives that follow the vision statement in this chapter lack detail on how they would be achieved and what measure of change would be considered necessary to make that judgement. The sustainability appraisal, published in TVBC's evidence base, which should be used to assess the impact of the local plan on the borough, lacks any detail and lacks any real appraisal – instead it just references a series of subsidiary topic documents.

Rivers –a strategic objective should be to conserve and enhance river water quality and biodiversity. These are globally rare, rich and fragile systems in decline. TVBC has a global responsibility to put river health high on its list of priorities. Name dropping SUD's, greywater and tree planting is not convincing without being integrated into policy.

Chapter 3: Spatial Strategy

Test Valley Sustainable Spatial Strategy

The only mention of previously developed, or brownfield, land in the whole document is the commitment in this strategy statement to maximising the use of previously developed land to support the resilience of the town centres. Brownfield sites offer the potential for higher density development based around public transport hubs, local services and walking and cycling, adding to the effective use of land. Development on such sites can also counter the thinning of town centre populations (see also comments on para. 5.37 and 5.38) and help maintain the viability of town centres.

The NPPF (paras.120,121) stresses the need to make as much use as possible of previously-developed or 'brownfield' land and makes numerous mentions of the use of brownfield registers – a facility that should surely be mentioned. TVBC's Brownfield Register (in evidence base) only contains 14 sites – TVBC should initiate a more frequent call for sites and also pro-actively look for sites.

3.17

This paragraph asks for comments on the role Neighbourhood Plans could play in allocating sites. CPRE's opinion is that local communities should be encouraged to participate in the allocation of development sites in their area and the procedure for allocation should facilitate this, whether or not a Neighbourhood Plan is in existence, bearing in mind that a Neighbourhood Plan may have been overtaken by the Local Plan.

3.27 Settlement Hierarchy

We suggest that the key facilities should include:

Post Office, especially in view of local bank branch closures.

GP or dental surgeries

Pharmacies

Good broadband coverage

Good mobile phone coverage.

A post-covid trend, which is likely to continue, is more working from home. So housing to support this is going to be more viable in communities where there is good broadband/mobile phone coverage. Working from home is also going to be less emitting of carbon where there is good public transport to the nearest town and where the community has some facilities of its own.

3.30

Stockbridge has considerably more in the way of facilities (including 7 different bus services: 7, 15, 16, 16a, 54, 68, 853) which distinguish it from other settlements in tier 2. Perhaps it should be in a tier of its own between the current tiers 1 and 2. A significant issue in Stockbridge is shortage of local labour and the way that people working there commute in by car and absorb much of the parking. The evidence presented in TVBC's 2009 paper on Review of Village Policy Boundaries showed that the population of Stockbridge had almost halved in the previous 50 years.

3.32

The principle of allocating according to the presence of facilities has merit but needs qualification in order to be an acceptable strategy.

- Decisions about the method of making the allocations should be made at the strategic level
- How will the numbers allocated to each settlement be calculated?
- Will the numbers be related to a housing needs survey for each village?
- How will the position in the settlement hierarchy influence the number?
- What will be the proportion of affordable housing in the allocations?

The size of individual developments in village locations should be limited to avoid overwhelming the existing settlement. Consideration should be given to limiting development in villages to the sites of 1ha or less which the NPPF requires local authorities to find. The settlement boundaries should be reviewed with the parish concerned to see if they would rather achieve their housing target via a more diffuse method.

It also needs to be considered whether the allocations should depend on any specific landscape factors identified either in neighbourhood plans or in the Test Valley Landscape Character Assessment. To gain local acceptance it is necessary that the site allocations and the scale of the development respect the size and character of the settlement. Each Parish needs to have the opportunity to comment on, and influence, the number allocated; and should have a decisive role in choosing the location of any development.

In CPRE's opinion these are strategic questions that should be agreed at Stage 1 of the consultation before sites are allocated in Stage 2.

3.33

Consideration should be given to allocating housing to Tier 4 where such development would provide the catalyst for the provision of new facilities or the retention of existing facilities e.g. village schools threatened by declining rolls.

Chapter 4: Strategic Policy Framework

4.14 Climate change strategy

CPRE believes that there should be a specific policy to handle the burgeoning number of applications for solar farms. The country needs renewable energy but TVBC should give consideration as to whether Test Valley is playing its part in contributing to the sustainability of UK's food supply as well as contributing to the UK's renewable energy supply. In our view solar farms on good quality agricultural land should not be permitted. The recent TVBC report on landscape implications of solar farms should also help bring a more structured approach to decision making on these applications.

TVBC should also do more to ensure that the buildings with large roof areas are constructed with solar arrays on their roofs.

4.32 Energy performance standards

If TVBC is serious about its declaration of a climate emergency, then clearly it should impose higher standards on new development. We would like to see higher insulation standards and the use of heat pumps and solar panels on domestic roofs where appropriate. Higher building costs could be offset by landowners receiving less for their land and need not necessarily result in higher prices for housebuyers/renters.

4.41 Local Gaps etc.

Local Gaps are valuable spatial planning tools for preventing coalescence of settlements protecting their identity and shaping the pattern of settlements. CPRE appreciates that they are not countryside protection designations.

Gaps command wide public support and have been used with success in successive strategic and local plans to influence the settlement pattern. The open nature/sense of separation between settlements cannot be protected effectively by other policy designations. The scale of development in Test Valley demands that measures be taken to define the extent of settlements and maintain their distinctiveness therefore Local Gaps should be retained and their boundaries defined in the Local Plan.

There are village communities with a strong sense of identity and community within the orbit of major settlements in the Borough. A physical separation between the major settlements and these communities is essential to their identity. A gap between settlements serves to maintain their visual separateness both by the views out of the settlement and by the experience of travelling from one settlement to another. The land to be included within the gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence. Note that the report A Green Infrastructure Strategy for Test Valley (2014 – 2019) included a recommendation for Local Gaps under “Retaining the settlement character and pattern”.

CPRE is also disappointed that no reference is made to the South Hampshire Green Belt. On February 26th 2021 Test Valley Council adopted, without dissent, a motion supporting the concept of a South Hampshire Green belt – ‘to provide vital access to countryside for people living in cities, towns and to preserve the distinctive and unique setting of our towns’. For the planning officers to ignore the wishes of the elected councillors is an affront to local democracy which should be rectified immediately.

4.42 Delivery of Sustainable Development

Andover currently has several large and inappropriately-placed commercial concerns – all constructed in a past era but now inappropriate because they bring HGV traffic right into the town. These are the flour mill complex in Millway Road, the grain silos off Weyhill Road, Travis Perkins close to the Folly roundabout, and the Switch logistics site next to the station.

All of these sites are in locations appropriate for high density housing development; this would reduce greenfield take and add to the vitality of the town. TVBC should be offering encouragement and inducements for these enterprises to move to industrial estates on the periphery of the town.

Portland Grove is another anachronism, being pre-war low density housing right in the centre of Andover, between Lidl and Chantry Lodge, and another site suitable for high density housing. The current residents should be offered pleasant alternative housing.

Apart from minimising the greenfield take, our reasoning behind these suggestions is that for the town centre to retain, and even gain, vitality at a time when high street shopping is in general decline, there need to be a lot more people living within easy reach of it. Furthermore such development would also help counter the gradual fall in town centre populations that will naturally occur as the proportion of smaller household increases due to demographic factors and the reduction in involuntary sharing by households. High density housing close to the station should also appeal to some of the thousands that commute to work by rail each day.

A quote from the NPPF (para.121) states:

‘Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.’

This suggests that TVBC could be more proactive in the land assembly process.

4.47 Town centre uses

While agreeing that Zone A ground floor use should be reserved for retail uses, this should not discourage TVBC from seeking development that provides much more residential development above street level (para. 4.48 omits Zone A from its residential aspirations). It has long been recognised that UK towns contain far fewer flats than their continental counterparts (e.g. see ONS report 'Twinned towns and sister cities, Great Britain and Europe: September 2020') and as a consequence have a much lower population density. Some Eurostat figures for densities are Paris: 55,673 inhabitants per square mile, Barcelona: 40,000, London: 15,400 Portsmouth: 13,365 – these are all cities but illustrate the point. (Southampton, whose overspill threatens southern Test Valley, appears to have a population density that is little over half of that of Portsmouth <https://www.plumplot.co.uk>). With less people coming into towns to shop, and more on-line retailing, towns cannot expect to have vitality unless there are more people living in them and this particularly applies to the evening economy.

4.52 Resilience to climate change

We can find no mention of water demand reduction. In this area of acute water stress and in line with its climate emergency brief, demand reduction should be front and centre to the Local Plan, enabling water conservation and river health and TVBC should be aiming at 100 lppd to fit in with the Southern Water Services Target 100. We wish to see you set your own standards for water consumption in houses built in the borough in excess of current building regulations.

4.106 Delivering infrastructure

We agree that infrastructure should be delivered early and not lag behind planning. This implies that water acquisition, transport and waste water treatment provision should be provided in advance of the development process. Water availability should be a key consideration in assessing planning applications for permission.

Although the EA and the water companies are the main agencies here, Test Valley Borough Council should be actively involved in liaising with them over the provision of water infrastructure ahead of any development. This is particularly important where grey water supplies are concerned.

4.111 Infrastructure

At present, there are no specific provisions within the Local Plan to safeguard the water environment, including groundwater resources (which are a source of water supply within the Borough). This is thought to be a catastrophic emission in view of the stresses on our water supply.

The Environment Agency's views on the limits of water extraction have been made quite clear. The dire nature of the EA's assessment is not adequately addressed in this document. TVBC should make a commitment not to increase the total abstracted over the plan period. The extra consumption caused by new development needs to be offset by a reduction in consumption within the existing developed area and the Local Plan needs to set out how this is going to be achieved.

Chapter 5: Meeting our Needs

5.10 Housing target

The figure of 541dpa that comes out of the standard method calculation is a target that is well beyond Test Valley's self-generated needs. The 2022 SHMA shows the following:

- 541dpa is approx. 170dpa above latest ONS projection of household growth in Test Valley.

- Test Valley has had a 16% population increase over the last 20 years, mostly driven by migration from other parts of UK
- 541dpa would see a further increase in population of 15% (19,000) up to 2040, again mostly driven by inward migration.
- Approximately 8,700 new jobs would be needed for these 19,000 extra people.

Furthermore, the household projections that will result from an analysis of the 2021 census are widely anticipated to be even lower than the 2018-based projections used by ONS in producing the 371dpa figure (largely as a result of significant changes in the levels of international in/out migration) thus even further increasing the gap between real need and imposed supply.

The 19,000 people (equivalent to a town the size of Alton) are going to add to the water demands in an already water-stressed district and will add to the challenges of waste water disposal. They, and their jobs, will also require more land thus further depleting the natural capital of Test Valley.

While absorbing this largely unnecessary population will be a problem for Test Valley, it will also be a problem for those parts of the UK which are going to lose population and therefore threaten their viability and vitality.

5.10 to 5.13

The text in these paragraphs should refer to housing requirement, rather than need, as the output of the standard method has little to do with local need.

5.13

CPRE therefore hopes that TVBC will reverse its intention, signalled in para.5.13, and will challenge the 541dpa figure and not be seduced by the substantial new homes bonus that will come to the council by accepting a higher than necessary figure. We note that the Sustainability Appraisal (Table 5) says that a key policy in deciding the housing requirement is to “Take account of current and future demographic trends in assessing housing need”, so why has this not been done?

5.29 et seq. Affordable Housing

A significant challenge for TVBC is that the affordable housing requirement identified by the SHMA is of a similar magnitude (in terms of dwellings per annum) to the overall dwellings requirement of 541dpa. It is clear that it cannot be met by relying on 40% of new development being affordable, or if it were met then there would be a significant surplus of market housing that was not strictly needed. TVBC’s aim of providing just 200 affordable dpa seems distinctly unambitious and will not come close to providing for the real needs of the borough. CPRE suggests the following measures to boost the supply:

- Directly finance and construct some council affordable housing
- Increase the percentage of affordable homes in new development to at least 50%. In this context we note (para. 5.5) that housing delivery has consistently exceeded targets, so clearly developers are not finding the 40% target onerous, especially as the major housebuilders have been recording substantial profits during this period. Also the government’s definition of affordable housing has changed such that 25% of affordable housing should be in the form of first homes. In view of the financial aid now available to first home buyers, affordable housing becomes a more marketable proposition for housebuilders. We also note that the 40% target in the current local plan has, in reality, only resulted in 30% of new dwellings constructed during the last 5 years being affordable (para. 5.6).

- The 15 dwelling threshold for rural development to contain the full quota of affordable housing should be dropped. Affordable housing is much needed in the villages and new homes in the villages are highly marketable so the removal of this threshold is unlikely to deter the building of small numbers of houses on rural sites.

5.37, 5.38 Housing mix

The government target of 300,000 homes per annum is greater than the ONS projections of annual growth in households because the government believes that there are a large number of ‘suppressed’ households i.e. households that are in involuntary sharing arrangements, largely due to financial circumstances. So what sort of housing is needed to relieve this situation? We suggest that most of these ‘suppressed’ households are going to be small households that are not particularly well off. So the emphasis has to be on providing small and (in some sense) affordable housing. TVBC therefore needs to be more prescriptive in the type of housing that is constructed; it should not be left to the housebuilders to construct the mix which is most profitable for them, as this will not resolve any of the social issues and will not relieve enough of the ‘suppressed’ households. It can also be noted that the latest ONS ‘Household projections for England: 2018-based’ contains the statement

‘We project the majority of household growth over the next 10 years will be because of an increase in older households without dependent children’

So this demographic factor should also affect the type of housing built.

If more smaller dwellings are constructed than are readily saleable, then this will help the situation by suppressing the price. Note that more smaller dwellings will also help to reduce the affordability factor used in the Standard Method – the whole raison d’être of the affordability factor is that price and supply are interdependent.

A side effect of reducing involuntary sharing will be a thinning of the population density in existing urban areas and this needs to be countered by maximising the housing development opportunities within them.

5.39 Specialist Housing

The SHMA also states that the over-65 population is expected to rise by 40% between 2020 and 2040; it suggests that as a consequence, around 20% of the new housing needs to be in the form of specialised accommodation for older people. CPRE questions this conclusion: many people, especially in the villages, move straight from owner-occupied houses to nursing homes. However, this is not to deny that specialist accommodation for older people, such as that at Carter’s Meadow and the Churchill flats in Andover, is an attractive proposition for many people and perhaps should be encouraged. Perhaps also the villages need more specialised accommodation for older people who are often reluctant to move out of the communities which they know.

5.54 et seq. Future Employment Needs

The Economy, Employment and Skills aims, highlighted in para. 2.55, are to ‘Promote a vibrant and resilient local economy, including the visitor economy, where future sustainable growth and innovation in green, high technology and other sectors can provide for a range of job opportunities and where businesses and individuals can thrive. Support a skilled and diverse workforce so that local people can access learning opportunities and jobs and benefit from greater prosperity.’

These ambitions contrast with the calculation of employment land requirements in sections following paragraph 5.54 in which there seems to be an emphasis on yet more storage and distribution land with inherent labour needs which are predominantly low skill and low tech. This is apparently based on an

extrapolation of recent trends included in PfSH's Economic, Employment and Commercial Needs Study rather than on TVBC's employment ambitions. Many modern warehouses are also highly automated and provide few employment opportunities apart from HGV and fork-lift truck drivers – so it should be asked whether even more of such development will do much for the community apart from increasing the lorry traffic on local roads.

The PfSH Economic, Employment and Commercial Needs Study reads like a report from a past era. There is little recognition of the climate emergency, increased working from home post-Covid – and consequent reduction in employment space demands, biodiversity commitments, reduction in take of natural resources including land, assessment of water needs, assessment of implied traffic movements and consequent carbon emissions.

The areas of new land take proposed by PfSH cannot be considered sustainable by any meaningful interpretation of the word; it is certainly compromising the options available to future generations.

TVBC should make its own assessment of employment needs and the Local Plan 2040 should propose positive steps to attract research and development and light industrial uses to Andover. We strongly endorse the desire to bring more high-quality employment to Andover and to gradually raise the general skill levels of the population. However, we believe that TVBC needs to be more proactive in fostering the town's links with universities, with scientific, medical and technical institutions and with centres of cultural excellence. It is a sad fact that the town can still offer no form of degree-level education and TVBC should be making all possible effort to rectify this situation.

Test Valley is known to be a good place to live:

<https://www.portsmouth.co.uk/lifestyle/homes-and-gardens/the-sunday-times-best-places-to-live-test-valley-in-hampshire-has-been-named-one-of-the-best-spots-to-live-in-the-uk-3643897>

TVBC should want to keep it that way and not spoil by inappropriate development.