

Comments

Regulation 18 Stage 1 Consultation draft

These are the comments of Abbotts Ann Parish Council in response to the Regulation 18 Stage 1 draft proposal for the Test Valley Local Plan 2040.

Spatial Strategy

The Council's proposals for a spatial strategy are set out at a strategic level in Chapter 3 of the document. A hierarchy of settlements is proposed that would locate housing development to settlements according to the presence of facilities such as shop, pub, church and school. It seems clear that more housing is to be allocated to settlements outside of the two main urban centres than in the Local Plan 2016. The Parish Council considers that the principle of allocating according to the presence of facilities and housing need has merit but needs qualification in order to be acceptable as a strategy.

- Decisions should be made at the strategic level about the method of making the allocations to each village.
 - 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?
 - Will consideration be given to allocating to, say, Tier 4 where such development would provide the catalyst for the provision of new facilities?
- 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 sites of 1 or 2 hectares.
- 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.

The Parish Council's opinion is that these are strategic question that should be agreed at Stage 1 of the consultation before sites are allocated in Stage 2.

Paragraph 3.17 asks for comments on the role Neighbourhood Plans could play in allocating sites. The Parish Council'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 over-taken by the Local Plan.

Employment and Employment Land

The section on Economy, Employment and Skills (2.55 – 2.58) in Chapter 2: Vision, Key Challenges and Objectives includes the statement:

“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 Chapter 5 Meeting our Needs 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 rather than on TVBC’s employment ambitions. The Local Plan 2040 should propose positive steps to attract research and development and light industrial uses to Andover.

Local Gaps

Statement in Reg 18 proposal:

Local Gaps: we will need to consider whether we need Local Gaps to help conserve the identity and character of communities by retaining space between settlements. We know there is strong support for Local Gaps from our communities however concern was also raised as to whether they were necessary. If Local Gaps are to be included, we would need to robustly justify the principle and location as national guidance does not contain specific requirements for Local Gaps. This includes whether we define boundaries or criteria approach for all development to adhere to.

Summary of response

- Local Gaps are valuable spatial planning tools for preventing coalescence of settlements protecting their identity and shaping the pattern of settlements. AAPC 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.
- Local Gaps should be retained and their boundaries defined in the Local Plan

Need for separation

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.

The importance of the Local Gap between Andover and Abbots Ann, identified in Policy E3 of the Revised Local Plan was locally recognised in the Abbots Ann Village Design Statement published in 2000 [and referred to in the Appendix to the Green Infrastructure Strategy (EB/ENV10)] which states *“Nowhere is the rural view from the village more important than to the north, where the rising ground of Little Park and the ridgeline of Farm Road are all that screen the village from urban Andover.”* In the first of its design guidelines the Village Design Statement says *“Care should be taken to maintain the area of countryside between Abbots Ann and the A303 so that it remains a physical and visible gap protecting the separate identity of Abbots Ann.”* This Village Design Statement has been supported and adopted by Test Valley Borough Council as a Supplementary Planning Document forming part of the Local Development Framework.

A Green Infrastructure Strategy for Test Valley (2014 – 2019) included the recommendation under “Retaining the settlement character and pattern”:

“Maintain a green gap between Andover and the villages of the Clatfords, Little Ann and Abbots Ann to protect the rural setting and character of the villages and Andover along the line of the Pillhill Brook and rising land to the west. “

As part of the requirement for good design, the NPPF and the National Design Guide stress the importance of creating and maintaining a sense of place and the distinctive character of settlements.

Shaping of urban structure

The designation of Gaps is a long established tool helping to define the structure of urban settlement and countryside and to prevent the coalescence of settlements. Given their strategic role in shaping the pattern of development they should not be discarded lightly

Gaps can have other positive aspects: in retaining open land adjacent to urban areas which can be used for new/enhanced recreation and other green infrastructure purposes.

National policy

The consultation document states a *need to robustly justify the principle and location [of Local Gaps] as national guidance does not contain specific requirements for Local Gaps.*

The absence of a specific gap policy in the NPPF does not invalidate such a policy. NPPF is a framework. It *"sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their accountable councils can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities."*

Para 157 of the NPPF states that local plans *"should identify land where development would be inappropriate, for instance, because of its environmental...significance."* This suggests that Local Gaps are not inconsistent with the NPPF but serve rather to support its objectives.

Duplication of policy

It has been suggested that Local Gaps are unnecessary in the light of policies in the Local Plan related to settlement definition, landscape character and environmental protection which, it is suggested, perform an identical function.

Policy E3 in the current Local Plan provides that *"development within Local Gaps will be permitted provided that:*

- a) it would not diminish the physical separation and/or visual separation; and*
- b) it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap. "*

The policy as to settlement boundary says: *"Development outside the boundaries of settlements in the hierarchy ----- will only be permitted if: a) It is appropriate in the countryside as set out in the local plan policies; or b) It is essential for the proposal to be located in the countryside."* This policy would not necessarily prevent development that would threaten the effectiveness of Local Gaps.

Environmental policies in the RLP, in particular Policy E2, are concerned with protecting landscape character and ensuring that development does not have a detrimental effect on landscape character. These policies do not necessarily prevent development that would threaten the effectiveness of Local Gaps.

Current Local Gap policy allows the potentially cumulative effect of individual developments to be taken into account in assessing threat to the integrity of the gap which other policies do not necessarily allow.

Definition of Local Gaps

The purpose of a designated "gap" is to allow individual settlements to retain their distinctive identity by preventing coalescence. To achieve this they must maintain a physical break in the built environment such that:

- no development is visible from the adjoining settlements and when passing through the break that would tend towards a visual coalescence of the settlements;
- open countryside is visible from settlements for which a countryside setting is part of their distinctive identity.

A gap is most effective when the boundary of adjoining settlements is marked by clear, visible features. In the case of the Andover/Abbotts Ann gap this is provided by the main railway line and A303 trunk road, forming an edge to the built-up area of Andover, and the Pillhill Brook marking the edge of Abbotts Ann.

In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation. This is best achieved by defining the boundaries of Local Gaps in the Local Plan rather than by a statement of criteria.