

Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 1

COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 1 document for public consultation. This consultation document sets out draft strategic planning priorities for Test Valley supported by a number of strategic policies.

The consultation period runs from Friday 11 February to noon on 8 April 2022. Please respond before the close of the consultation period so that your comments may be taken into account.

You can respond to our consultation by filling out the form below. This form has two parts:

Part A: Your Details

Part B: Your Comments (please fill in a separate sheet for each comment you wish to make)

Further information can be found on our website at:

www.testvalley.gov.uk/localplan2040

Once the form has been completed, please send to
[REDACTED] by **noon on 8 April 2022**.

Following receipt of your comments from, we will keep you informed of future consultation stages unless you advise us that you want to opt out of such communication.

If you are unable to send via email, please send a postal copy to our address below.

Contacting us

Planning Policy and Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

Tel: [REDACTED]

Website: www.testvalley.gov.uk/nextlocalplan

Email: [REDACTED]

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Mrs	First Name*	Caroline
Surname*	Jezeph		
Organisation* (If responding on behalf of an organisation)	BJC Planning		

Please provide your email address below:

Email Address*	
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Alternatively, if you don't have an email address please provide your postal address.

Address*			
		Postcode	

If you are an agent or responding on behalf of another party, please give the name/company/organisation you are representing:

Lyell Fairlie (MMA) Settlement Trust

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. Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box. For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

General

Attention is drawn to the following points:

“Meeting Housing Demand”: Report published by The House of Lords Built Environment Committee

The House of Lords Built Environment Committee has published “*Meeting Housing Demand*”, a new report with a set of recommendations for government to support new housing delivery to combat the “expensive, unsuitable and poor quality” homes that most people live in.

As well as calling for an increase in money spent on social housing, the report singles out the crucial role that Small to Medium-Sized (SME) housebuilders have in building more and better homes. It also cites their vital role in diversifying the market. It states that:-

“SMEs should be supported through reduced planning risk, making more small sites available, and increased access to finance,” states the report, which also puts forward recommendations to create a fast-track planning process specifically for SMEs that would help reduce delays and planning risk.”

Self Build and Custom Build Housing.

The Local Plan should make specific reference to the importance of providing sites for self build and custom build housing. This form of housing can meet the need for homes that require minimal energy inputs and help to meet the zero carbon challenge and climate change issues. High levels of home insulation are especially beneficial for the older members of society, who are more susceptible to the cold.

Downsizing

Another important factor in the market that the report refers to is the ageing population, with the knowledge that a quarter of the UK population will be over 65 by 2050, up from 19 per cent in 2019. At the present time, many of these older people remain in unsuitable, under-occupied homes, effectively family-sized homes that fail to come on to the market. This creates a bottle-neck at the top of the market due to a lack of suitable downsizing properties.

It is important that the Local Plan facilitates “downsizing”.

Business Hubs

It is also important that the Local Plan refers to the need for business hubs to be provided in the rural areas. We are moving as a society to high levels of home working but not everyone has a room to accommodate an office. A local hub could not only provide space but a meeting of minds that could generate the seed corn for new businesses.

Paragraph Ref	Specific Comments
Para 3.12	<p>Spatial Strategy The spatial strategy includes greater support for rural settlements. This is an important change of emphasis from the previous Local Plan and is welcomed. The restriction upon development in the rural settlements in recent years has led to the decline of local services and an ageing of the populations, as there has been little opportunity for young families to take up residence.</p> <p>In principle the Council's Sustainable Spatial Strategy is supported. However, when more specific policies emerge at Stage 2 further comments may be made.</p>
Para 3.18	<p>Land north of East Dean Road (SHELAA Site 8) Paragraph 3.18 refers to the national policy requirement of a minimum of 10% of the total supply to be on sites of less than 1 hectare. This reflects the provisions set out in the NPPF at paragraph 69a). The advantage of small and medium sites is that they can make an important contribution to meeting the housing requirements in an area, and are often build out relatively quickly. The SHELAA site 8 land north of East Dean Road has a developable area of no more than 0.7ha.</p> <p>It is well placed within the settlement of Lockerley. It adjoins the existing settlement boundary on the northern enclave of the settlement. It is suitable for a small-scale development or even for self-build or custom build units.</p> <p>Land to the west of Holbury Lane (SHELAA Site 7) This site offers land also adjoining the existing settlement boundary of Lockerley. The site itself is within the parish of East Dean but the site relates to Lockerley. In adjoining the existing settlement boundary the site is by definition reasonably sustainable. Although the total site area is in excess of 1 hectare there is no reason why an area of less than 1 hectare should not be developed. The southern part of site could be considered for development. The remaining land could offer the prospect of land for nitrate offsetting, biodiversity net gain and/or rewilding. The north western part of the site adjoins the existing natural area bordering the River Dun.</p>
Para 3.19	<p>Settlement Hierarchy The concept of the hierarchy is supported as a means of assessing the settlement types. However, the actual hierarchy is partially flawed in its assessments and conclusions as set out further below.</p>
Para 3.21	<p>The statement in paragraph 3.21 is particularly endorsed.</p> <p>Test Valley is predominantly rural in nature and has a number of smaller settlements. In rural areas, planning policies and decisions should be responsive to local circumstances, support</p>

housing developments that reflect local needs and identify opportunities for villages to grow and thrive, especially where this will support local services.

**Paras 3.23-3.28
Appendix 1**

**Settlement Hierarchy Assessment
Topic Paper**

Settlement Hierarchy Assessment

The Settlement Hierarchy Assessment explains the details of the survey and the assessment which was the determinant in the proposed hierarchy.

The Assessment commences with some extracts from the National Planning Policy Framework. Of the chosen extracts paragraphs 79,84, 105 and 114 of the NPPF stand out as particularly supportive of addressing the needs of rural communities.

The identification of the 6 key facilities, which are determinants in the formation of the hierarchy, is important. The first 5 key facilities plus access to public transport provide a reasonable measure of services which are valuable to most residents. However, the category of 'place of worship' has little relevance in today's society. It should be placed within another category, such as village or community hall. Attendance at Church has been declining for decades and is not really a relevant criterion for assessing a settlement.

The Local Plan rightly places considerable emphasis on all forms of sustainability including that of sustainable transport. This is important in the context of the Council's declaration of a Climate Emergency. The inclusion of access to a good level of public transport is an important construct of sustainability. However, another criterion, the use of the bicycle, is completely missed. Why is accessibility to good cycle routes not a key consideration? This should be included.

Para 3.31

Chilworth

The justification for raising the settlement to the level 2 tier is puzzling and unjustified. The settlement scores just 4 key facilities and M in terms of public transport. It is the proximity to the Southampton Science Park, Eastleigh, Chandlers Ford and Southampton which are said to justify the tier 2 status. However, the distances below do not suggest a particularly close proximity to the urban areas which suggests that the settlement does not warrant tier 2 status.

Approximate measurements by road indicate:

Chilworth	Chandler Ford	5.1km
Chilworth	Eastleigh	5.4km
Chilworth	Southampton	6.9km

These distances are greater than the distances from some similar sized, but lower order settlements, to other tier 1 and 2 settlements.

Paras 5.18 - 5.21 Figure 5.1	The proposed revision to the Housing Market Areas is supported. This appears to be a much more realistic division between the market areas around Andover and Romsey. A split of 57% and 43% of the housing requirement is welcomed.
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Please use next page if necessary

What happens next?

All valid responses received within the consultation period will be acknowledged and you will be given a reference number. Please quote this number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.