

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 planningpolicy@testvalley.gov.uk 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: 01264 368000

Website: www.testvalley.gov.uk/nextlocalplan

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Mr	First Name*	Mark
Surname*	Biles		
Organisation* (If responding on behalf of an organisation)	Hampshire County Council Property Services		

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:

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>

Paragraph Ref	Specific Comments
Spatial Strategy/Vision Paras 2.28-2.32 Paras 2.46-2.51	<p>Comment</p> <p>Hampshire County Council in its role, as both a public landowner and service provider, supports the principles of the draft spatial strategy and vision. With reference to community facilities, the County Council is mindful of the need for the Local Plan not to be overly restrictive to be effective in responding to the needs of public service providers during the Plan period.</p> <p>The County Council would like to emphasise its statutory function to provide public services. To remain effective in meeting its commitment, the County Council will be implementing a series of service-driven improvements, covering both frontline and support services during the emerging Plan period to 2040 in line with its corporate priorities. This could result in the ‘necessary loss’ of community buildings and land in County Council ownership in order to reinvest proceeds of sale to deliver on-going operational service improvements. Such County Council services include ‘Children’s Services’ (pre-school through to the 14-19 year age group), Adults Health and Care Services (catering for those with learning disabilities, mental health, older people, and persons with physical disabilities), and ‘Community and Cultural Services’ (libraries, museums, sports, recreation and tourism).</p> <p>The County Council would respectfully request that any emerging policies in the draft Plan include sufficient flexibility to accommodate the unique role and function of public service providers. This approach is supported by paragraph 93 of the NPPF (July 2021), which requires the LPA to “plan positively” to “provide social, recreational and cultural facilities and services the community needs”.</p> <p>The County Council therefore recommends the Borough Council considers the example wording in policies recently adopted by Basingstoke & Deane Borough Council (Policy CN8 – Community, Leisure and Cultural Facilities, part h of the Adopted Local Plan 2011 – 2029) and South Downs National Park Authority (Policy SD43- New and Existing Community Facilities of the Local Plan 2014– 2033).</p> <p>The County Council’s proposed policy approach above would support the unique role and function of public service providers and their need for managed change. This approach would enable flexibility to deliver public service providers operational service improvements over the Plan period whilst maintaining the policy intentions for protecting and providing community facilities in the Local Plan to be justified and effective.</p>
Spatial Strategy Policy 1 and Para 3.18	<p>Support</p> <p>Hampshire County Council in its capacity as landowner supports the spatial approach to meeting the Borough’s housing need through delivering the appropriate level of development in more sustainable settlements and considering a mixture and range of sites as set out in Spatial Strategy Policy 1 (Settlement Hierarchy).</p>

**Strategic
Policy 1**

The County Council considers that the proposed Settlement Hierarchy approach to grouping settlements by size, role and provision of services and facilities is sound based on the Borough Council's Local Plan evidence base. This approach is positively prepared, justified, effective / deliverable within the Plan period and consistent with national policy and guidance.

At this stage the County Council would like to highlight a number of sites within HCC landownership in the TVBC 2021 SHELAA that could be made available if required to support the Borough's housing needs; land at Grazing Land, Charlton (Site 242), Lancaster House (Site 240) and Manor Farm Grazing (Site 243). These sites are included in Tier 2 and as such regarded as a sustainable locations, also being available for development.

Comment

Hampshire County Council in its role, as both a public landowner and service provider, supports the principles of Policy 1 (Countering Climate Change) and welcomes the opportunity to address non-residential development and Climate Change.

As the Borough Council is likely to be aware, Hampshire County Council declared a Climate Emergency in June 2019 setting the following two targets for Hampshire as a whole: to be Carbon neutral by 2050 and preparing to be resilient to the impacts of a 2°C temperature rise. To deliver its targets, the County Council has published a ['Hampshire County Council Climate Change Strategy 2020-2025'](#).

In its role as a public landowner and Property Services function delivering operational public built assets, such as new schools, Hampshire County Council considers that all development needs to be consistent with national policy, by being aligned with relevant Building Regulations or future equivalents as they evolve. This is aligned with the preferred approach of government as set out in the 2-part consultation for Future Homes Standard and Future Buildings Standard (2019-2021), which stated that '... we propose to remove the ability of local planning authorities to set higher energy efficiency standards than those in the Building Regulations. This has led to disparate energy efficiency standards across the country and can create inefficiencies in supply chains, labour and potentially quality of outcomes. Removing this ability will create certainty and consistency.'

Should the Borough Council seek to define a carbon standard for development, Hampshire County Council in its role as a public landowner and Property Services function strongly encourages the Borough Council to consider an alternative approach for all new development to be 'zero carbon in-use' rather than net zero carbon. As part of this alternative approach the County Council would recommend the use of the [RIBA 2030 Climate Challenge \(Version 2, 2021\)](#) targets with its stepped targets for 2020, 2025 and 2030 for operational energy in use, embodied carbon and potable water for new development in the Plan period. This approach would be achievable and deliverable for new development during the Plan period to 2040 (sound). It would also help contribute in a proportional way towards achieving the national government and County Council target of net zero carbon by 2050.

**Strategic
Policy 2**

With increasingly limited access on publicly funded projects, Hampshire County Council has adopted a pragmatic approach of following the Best Practice principles required by recognised sustainability standards without necessarily strictly complying with certain standards i.e. BREEAM. Hampshire County Council therefore recommends that an element of flexibility is incorporated into any emerging policy for the benefit of public bodies to provide essential services and to enable delivery of improved public buildings over the proposed plan period.

Should the Borough Council refer to a certification regime for energy performance requirements in the emerging Local Plan, the County Council as landowner, recommends that the Borough Council may wish to include standards such as those based on an embodied carbon (CO2 / Kg / sqm) metric as advocated by the [RIBA 2030 Climate Challenge \(Version 2, 2021\)](#). This is part of a holistic policy approach to responding to climate change through design by looking at non-residential buildings in the context of their site and added biodiversity net gain, as well as natural capital opportunities to support the achievability of sustainable development within the Plan period to 2040. Additionally, any detailed policy could suggest that if the applicable standard is financially unviable or technically unfeasible then this should be demonstrated with appropriate evidence in support of the planning application.

Comment

Hampshire County Council in its role, as both a public landowner and service provider, supports the aims of Strategic Policy 2 (Delivering Healthy, Well-Designed Development). With reference to green infrastructure, the County Council would respectfully request that any emerging policy would reinforce the unique role and function of public service providers and their need for managed change to deliver operational service improvements over the Plan period to be effective.

The emerging Local Plan needs to allow sufficient flexibility to secure future improvements to education facilities during the plan period. Where central government funding is not available, the only way that education improvements can be funded is through developer contributions and through the disposal of surplus land within school sites, including school playing fields. As the LPA will be aware, the operational needs of a state provided school and it's playing field are already protected by layers of planning policy and legislation. The County Council requests that any emerging green infrastructure/open space policy acknowledges Section 77(1) of the School Standards and Framework Act 1998 and Part 1 of Schedule 1 to the Academies Act 2010. This is considered a sound approach to justify the loss of school playing fields when it's part of Hampshire County Council's operational plans for funding education improvements as a public service provider during the Plan period (justified, effective and consistent with national policy).

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<p>Strategic Policy 5</p>	<p>Support</p> <p>In its role as a public landowner, Hampshire County Council considers that Strategic Policy 5 (Delivering Infrastructure) can offer a robust policy approach to infrastructure provision during the Plan period. Notwithstanding its support for the overall approach, the County Council would advise caution as often large-scale and local infrastructure delivery is only possible when it can be delivered by its statutory provider. In addition to external funding, the technical achievability of providing the infrastructure can also affect its timing. On this basis, the County Council in its capacity as landowner agrees with the Borough Council that further policies, such as site allocations, are needed to achieve an integrated approach that responds to service providers future infrastructure needs as early as possible within the Local Plan.</p>
<p>Strategic Policy 6</p>	<p>Support</p> <p>Hampshire County Council in its capacity as landowner supports the spatial approach to Strategic Policy 6 (Housing Provision) to distribute the housing requirement between the Northern and Southern Test Valley Housing Market Areas and agrees that the two Housing Market Areas (HMAs) could be further split, based on appropriate evidence to be considered at the next stage of the draft plan (Stage 2). However, the County Council considers that the approach of defining HMAs based on local parish administrative boundaries would not be in line with the NPPF (2019) and so would not recommend this approach to inform potential sub areas.</p> <p>The County Council considers that Strategic Policy 6 offers a sound approach that is positively prepared, justified and deliverable within the Plan period (effective) based on the Borough Council's objectively assessed needs and Local Plan evidence base.</p>
<p>Paras 5.48-5.59</p>	<p>Support</p> <p>Hampshire County Council in its role as a public landowner supports the Borough's approach to meeting employment needs as presented in the draft plan (Stage 1) because it is justified by an evidenced approach consistent with Local Plan making Regulations. At this stage the County Council would like to highlight land at Kennel's Farm (Site 244 in the TVBC 2021 SHELAA) that could be made available if required to support the Borough's employment needs.</p>

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.