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Enquiries to Tim Guymer

My reference

Direct Line [Redacted]

Your reference

Date 7 April 2022

Email [Redacted]

Dear Sir,

Test Valley Borough Council Draft Local Plan 2040 Regulation 18 Stage 1

Thank you for the opportunity to comment on the Local Plan 2040 Regulation 18, Stage 1 (hereafter referred to as the 'Local Plan') and accompanying evidence. The County Council recognise that the Borough Council is at an early stage of plan preparation, with further consultation to follow.

This response is provided on behalf of Hampshire County Council in its statutory capacity as Local Highway Authority, Lead Local Flood Authority, Local Education Authority, Waste Disposal Authority, Minerals and Waste Planning Authority and the authority responsible for Public Health; as well as the provider of public services within Test Valley.

Place making

The vision and objectives proposed in the emerging Local Plan are generally supported by the County Council, reflecting general principles described in local plans across the county. In that context however, encouragement is given for the Borough Council to consider developing a clearer vision and objectives that are distinctive to the Borough as a place and group of communities.

The Borough has a unique set of characteristics that contribute to its identity, including its orientation to the River Test, relationship to the National Parks and Areas of Outstanding Natural Beauty and to south Hampshire. Within the Borough, its comparative absence of national designations perhaps affords it more flexibility and adaptability to respond to the challenges of responding to

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the climate emergency and delivering sustainable development, including potentially through mitigation schemes.

Providing for a flexible and agile delivery of services, facilities and infrastructure across the public sector.

Along with Test Valley Borough Council and a number of other organisations and bodies, the County Council manages a significant public estate across Test Valley, providing a range of services and facilities. Over the course of the Plan period, it is recognised that the demand and operational requirements of these facilities and services are likely to change significantly.

In this context, whilst recognising the strategic nature of the Plan at this stage, it is suggested that the text accompanying the draft vision and objectives could be supplemented to recognise the need for the Plan to provide flexibility and adaptability for service provision. The County Council itself expects to implement a series of service-driven improvements, covering both frontline and support services during the emerging Plan period to 2040.

This may result in the necessary disposal of community buildings and land currently in County Council ownership in order to reinvest proceeds of sale to deliver on-going operational service improvements. The County Council therefore seeks that any emerging policies in the draft Plan include sufficient flexibility to accommodate the unique role and function of public service providers and their need for managed change. 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”.

Such an approach is already embedded in policies in recently adopted local plans including:

- Policy CN8 of Basingstoke & Deane Borough Council’s Adopted Local Plan 2011 – 2029; and
- Policy SD43 of South Downs National Park Authority Adopted Local Plan 2014– 2033

Transport

Hampshire County Council, in its role as Local Highway Authority, is preparing a new Local Transport Plan (LTP4) for the county which is currently being consulted upon. This document sets out the vision intended outcomes, guiding principles and policies for planning and delivering transport in Hampshire in the period up to 2050. Key objectives within this document are the encouragement of modal shift, decarbonising the transport system and the need to plan more effectively for people and places.

Having reviewed the proposed vision (pg 18) and objectives (pg 25) in relation to sustainable transport and movement, the County Council would encourage the Borough Council to go further in encouraging more people to pursue sustainable transport options, other than the private motor car. Many of the more populated parts of the Borough benefit from good public transport options that could be encouraged to be utilised to a greater extent, including focusing major new developments in these areas. It is also suggested that the challenges for non-car based travel in the more rural locations in the Borough should not be perceived as barriers but as opportunities. Linking rural locations to public transport hubs via good quality cycling and walking infrastructure could help to reduce car-dependency issues in those areas. More generally, it is suggested that active travel could be given more emphasis in the emerging Local Plan than currently proposed, especially for the role it plays in economic growth, wellbeing and health and the environment.

The County Council welcomes the opportunity to work with the Borough Council in preparing the evidence base to help inform the potential transport impacts arising from future growth options. In particular, officers would be keen to input and review the proposed methodology to be used in preparing the interim Transport Assessment, including the potential use of a Transport Model to assess the wider transport impacts of potential strategic distribution options of proposed development across the Borough.

Without prejudice to the above, at this stage the County Council is supportive of the identified hierarchy for focusing new development. The tier 1 settlements of Romsey and Andover are considered to be likely to provide the most opportunities for sustainable travel, with good public transport links to surrounding areas and a range of facilities and services (including workplace employment) within easy access without reliance on private car. It is also noted that both settlements are also well related to the strategic road network, which has good capacity.

More generally, the County Council would encourage the Borough Council to consider embedding the principle of the 20 minute neighbourhood model in its emerging policies. New site allocations should look to be located based on these principles to make them as sustainable as possible in terms of transport, facilities, employment and leisure. Opportunities should also be explored to enable the model to begin to be applied to existing areas, identifying ways in which improved sustainable links can be made between areas and new facilities and services encouraged.

As a point of minor clarification, the County Council expects the forthcoming Local Cycling and Walking Infrastructure Plans referenced in paragraphs 2.63 and 4.126 to be prepared for the northern Test Valley area, not just the 'Andover area'. Officers look forward to working collaboratively with the Borough Council and Sustrans (sic) in this regard.

As the Local Plan continues to be prepared, officers look forward to continuing to provide more detailed input into emerging policies to address the broad matters covered above and to ensure that other soft travel measures are also provided for e.g. encouragement for car clubs, car sharing, work space parking, travel plans, electric vehicle charging and also adequate provisions for cycle storage in both home and town centres for both traditional and electric bikes.

Public rights of way network and strategic countryside sites

The emerging Local Plan does not appear to fully recognise the importance of the public rights of way network across the Borough in supporting sustainable transport and movement. For instance, there is no obvious reference to the public rights of way (PROW) network nor to equestrians – potentially a significant travel group in a semi-rural/rural area. The PROW network is considered to be a strategic tool in facilitating high-quality, sustainable development, enhancing the integration of new development into its surrounding landscape and travel network. Given the relationship of the Borough to the two national parks, there may also be opportunities to improve and enhance the PROW between these areas in order to encourage more sustainable travel patterns, healthier lifestyles and a growth in the visitor economy.

The County Council would also encourage the emerging Local Plan to address the role of strategic countryside/recreation sites across the Borough (such as Danebury Iron Age Hillfort and Sir Harold Hillier Gardens) in providing an important recreational amenity for people. This applies to protecting and enhancing existing sites, as well as potentially considering the expansion and provision of new sites (including the Forest Park north of Southampton) to accommodate additional recreational demands arising from the increased and changing population demands from people living both within the Borough and beyond.

Areas of the emerging Local Plan which could be enhanced to address this include:

Policy 2 – it is suggested that the delivery of healthy, well-designed developments should include recognition of how the development will relate to the existing PROW network and strategic countryside/recreation sites. Opportunities should be taken where appropriate to enhance the PROW network in order to promote sustainable and active lifestyles. In relation to the provision of green infrastructure, the opportunity could be taken to specifically recognise the unique role and function that public service providers have in its delivery and management. In this context, encouragement for early engagement with public service providers to ensure that improvements to such infrastructure is planned and managed effectively over the Plan period.

Policy 5 - this policy, and accompanying text, should perhaps provide further detail about the type of infrastructure that is likely to be expected to be required to mitigate the impact of development in Test Valley

Sustainable transport and movement – could be enhanced by ideally including references to the PROW network – a key factor in sustainable active travel, including, but not exclusively for recreation purposes. This is particularly significant in the Borough’s more rural areas. It is also noted that no reference is made to equestrian travel. Enabling horse-riding on sustainable travel networks is not overly onerous and further opportunities should be taken to encourage this.

The County Council notes in paragraphs 2.42-2.45 that the emerging Local Plan will provide opportunities to conserve and encourage nature and biodiversity across the plan area, including parks and open spaces. The County Council would encourage the Borough Council to be ambitious in this regard, preparing policies that enable such spaces (existing and proposed) to be at the forefront of the green recovery and thus a vital component in ensuring the long-term sustainability of the Borough.

Economic Development

The County Council continue to support the Borough Council’s approach to the development and regeneration of Andover and Romsey town centres, and looks forward to continued partnership working on these projects. More generally, the County Council would suggest that further consideration is given to identifying a wider employment development strategy for the Borough, mindful that some key sites lie outside of defined town centres (e.g. Nursling/Adanac Park & Chilworth Science Park).

It also notes that the Needs Study implies a need for over 500,000 sq.m of new floorspace which could be required in the Borough. At this stage, it shares the Borough Council’s reservations about whether such a figure is justified and endorses the approach to undertake further assessment and testing of the potential needs. Officers from the County Council’s Economic Business and Intelligence Service are available to discuss this further if that would be of assistance.

Education needs

The County Council notes that a minimum need for 10,820 dwellings has been identified for the period 2020 to 2040. Taking account of existing commitments, sites for 4,453 additional dwellings need to be identified of which 3,505 dwellings are required to meet needs in northern Test Valley and 948 in southern Test Valley.

Until specific sites have been identified for potential allocation for development, it is not possible to comments on the specific school place

requirements arising. General guidance on the principles that the County Council as Local Education Authority follows in considering potential school place needs arising from new development can be found in its [Developer Contribution Guidance Document](#).

Based on the minimum housing requirements identified in the emerging Local Plan, it is considered likely that additional secondary school places generated across the Borough from new development could be accommodated at existing secondary school sites, albeit with some schools likely to be required to expand to meet these needs. This would be expected to be funded through developer contributions secured through section 106 agreements.

For early years and primary school places, this is likely to be more dependant on the exact scale and location of proposed housing sites. In certain circumstances, it may be appropriate to seek on-site provision as part of a comprehensive mixed use development. The County Council would otherwise expect to seek developer contributions for off-site provision secured through Section 106 agreements.

Strategic approach to waste and recycling

Waste prevention, minimisation and recycling

The Sustainability Appraisal recognises, in relation to the existing Revised Local Plan, that *“The Revised Local Plan policies are unlikely to result in a significant change in the amount of waste that is generated per person or household, or the proportion of waste that is reused, recycled or composted”* (Page 41 of SA). In this context, the County Council looks forward to working with the Borough Council in preparing new policies and strategies within the emerging Local Plan that make a positive impact on the amount of waste generated and the proportions reused, recycled and composted. This includes exploring the potential for ways in which local plans could encourage the provision of premises to support businesses set up seeking to prevent, minimise and reuse waste. We would also be encouraging policies for new development to be prepared that ensure that new developments are planned around a clear prevent, minimise and reuse waste strategy.

Such a direction of travel reflects Defra’s recent Waste Prevention Plan Consultation which states that:

“We would like to see local authorities taking waste prevention into account in the development of their Waste Management Plans, as well as Site Allocation Plans and Local Plans that underpin development control decisions. The evidence suggests that the latter needs to reflect the importance of space for storage of reusable goods, and reuse and repair services. Local authorities are expected to report on “reuse & recycling” and reporting more clearly as to action against each of these would help them meet their duties under the waste hierarchy’.”

Household Waste and Recycling Centres

In terms of physical infrastructure, the County Council currently operates two household waste recycling centres (HWRCs) in the Borough. These provide a key role in diverting household waste from disposal: reusing, recycling or recovering an average of 84% of the material brought to them in 19/20. The Bunny Lane HWRC just north of Romsey is the primary HWRC for residents of Romsey and the southern part of the Borough. The existing site is a relatively small, single-level facility which was subject of layout improvements in 2011 to address specific health and safety concerns. The physical limitations of the site prevent its future development. In particular, modern HWRCs are typically now 'split level' where waste containers are set lower in the ground to minimise the use of steps and enable servicing vehicles to be kept separate from the public. These are considered safer to use and are shown to achieve higher recycling rates than single level sites.

With the continued development in southern part of the Borough, including planned new housing development, it is likely that the present site will become insufficient for the needs of the growing population. Therefore suitable provision should be provided in the emerging Local Plan for land to accommodate a new split level HWRC with capacity to better serve the growing population of Romsey and the surrounding area.

Minerals & Waste Planning

From a minerals and waste planning perspective, the County Council is pleased that the adopted Hampshire Minerals and Waste Plan is referenced as an important influence on the preparation of the Local Plan. It is also noted that the Minerals Safeguarding Areas, as provided for in Policy 15 of the Minerals & Waste Plan, have been considered in the assessment of each developable housing, mixed and employment site, within the Strategic Housing and Employment Land Availability Assessment (SHELAA) prepared in 2021.

In this regard, the County Council considers that the SHELAA should be updated to incorporate the details in Table 1 relating to sites that are located within a Minerals and Waste Safeguarding Area (MWSA). The 'notes' column in the table highlights why these sites have been included, whilst the 'planning requirements' identifies the potential planning requirements arising at the planning application stage for these sites, if it is considered appropriate to explore the development potential of the site further.

Table 1: SHELAA sites within the MWSA

SHELAA Reference	Site name	Notes	Planning requirements
252	Littlebridge	Large areas of the site lie within the MSA, however, this has not been included as a site constraint.	A Mineral Safeguarding Assessment should be submitted as part of any pre-application advice request or planning application.
362	Fairbournes Farm	South western corner of the site lies within the safeguarded buffer zone of The Waste Centre, Yokesford Hill.	Any submission proposal should have consideration of the safeguarded nature of the site highlighted. Mitigation measures may be required.
173	Land North of Andover (Enham Park)	Large areas of the site lie within the MSA, however, this has not been included as a site constraint.	A Mineral Safeguarding Assessment should be submitted as part of any pre-application advice request or planning application.

Whilst only some of the SHELAA sites require a full Minerals Assessment, the County Council would request that wording is added to each of the site's assessment comments to recognise the need for potential mineral extraction, where suitable. Potential site-specific wording to be included could consist of the following: 'The site is within a Minerals Consultation Area. Mineral extraction may be appropriate, where environmentally suitable, subject to confirmation of the scale and quality of the resource.'

The County Council would also stress that any development or significant redevelopment of land may impact on mineral resources. As minerals can only be worked where they are found, it is important that viable mineral resources are 'safeguarded' (protected) in the emerging Local Plan from needless sterilisation by other development to help to secure a long-term future supply of minerals. Mineral resources are necessary for a significant array of construction activities and its availability is usually a practical prerequisite for any significant development to take place. If it is necessary for non-mineral development to take place the prior extraction of mineral, where practicable and environmentally feasible, is encouraged.

Adult services

It is noted that the emerging Local Plan makes several general references to ensuring that the differing needs of its population are met as the plan continues to be prepared including provision for affordable housing and rural housing. The emerging plan references the objectives of the Andover masterplan to improving its accessibility for the elderly and meeting needs of all residents (para 4.72). In this context there does not appear to be such specific provision referenced for the south of Romsey Town Centre masterplan (para 4.74). The County Council would welcome clarification on whether the seemingly different emphasis is intentional.

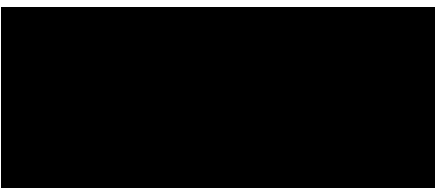
The references in paragraphs 5.3, 5.39 and 5.40 in relation to whether specific policies are required for the provision of specialised accommodation for older people and those in need in care are also noted. Taking into account the significant needs indicated in the SHMA in this regard, the County Council would encourage the Borough Council to identify its strategy to meet these needs at the earliest opportunity, including consideration as to whether specific site allocations will be required to ensure that sites are provided in locations that recognise the particular needs of these groups.

Public health

From a public health perspective, the County Council notes that there are a number of identified approaches throughout the plan that are likely to have a positive impact on public health. These include approaches in supporting active travel, green infrastructure and addressing pollution. The County Council look forward to the Borough Council providing further details as the Plan develops in how it proposes to reduce health inequalities, mitigate pollution and how sufficient health and social infrastructure will be provided for.

I trust that these comments are of assistance. If it would be helpful to discuss these further, please do not hesitate to contact my colleague Tim Guymer on the number above.

Yours faithfully,



Stuart Jarvis
Director of Economy, Transport and Environment