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: <u>www.testvalley.gov.uk/localplan2040</u>

Once the form has been completed, please send to 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: Website: www.testvalley.gov.uk/nextlocalplan Email:



Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Mr	First Name*	Jeremy
Surname*	Gardiner		
Organisation* (If responding on behalf of an organisation)	Pegasus Group, on behalf of the Faberstown Trust		

Please provide your email address below:

Email	
Address*	

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:

Pegasus Group responding on behalf of the Faberstown 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

Please find specific comments enclosed within our submission as follows:
TVBC Reg 18 Stage 1 LP Representations Letter April 2022;

Appendix 1 – Promotional Document 2021;
Appendix 2 – Illustrative Masterplan A104324 IMP-01;
Appendix 3 – Refined Issues and Options Consultation Response 2020;
Appendix 4 – Land east of Ludgershall, SHELAA 2021 Assessment;
Appendix 5 - Settlement Hierarchy Review Paper March 2022

Paragraph Ref	Specific Comments
Representations Letter	This letter and its appendices form our response to the Regulation 18 Stage 1 draft Local Plan 2040.
	As detailed in the letter, we consider that the proposed Settlement Hierarchy, Spatial Strategy and defined housing target will fail to meet the housing needs of the Borough including its affordable housing needs. We are concerned that the proposed Settlement Hierarchy as drafted is an unsound basis for a spatial strategy, as alternative sustainable options are currently being overlooked and insufficient strategic allocations of land will be identified due to environmental capacity constraints at a number of the higher tier settlements in the Hierarchy. The Settlement Hierarchy should take into account the extent to which land around settlements is constrained by restrictive designations in reaching conclusions regarding the suitability of each settlement for strategic allocations of land for development.
	We have also highlighted the anomalous way in which our client's site East of Ludgershall has been assessed in the Council's SHELAA; assessed in relation to the small village of Redenham some 2km east, but not to the town of Ludgershall which it directly abuts. This contrasts with previous residential allocations at Valley Park, Stoneham Park, Nursling and Rownhams.
	On this basis, the following recommendations are made:
	Recommendation 1: that the Council, in determining its Local Housing Need figures, takes account of the acute levels of affordable housing need in the Borough, of the affordability of housing and customer choice in the housing market across the Borough, of the Council's consistent recent delivery of 800 – 1,000 dwelling completions per annum, and of potential future issues relating to site deliverability and build-out rates especially for any potential large strategic allocations similar to Whitenap. The allocation of a mix of site sizes, rather than heavy reliance on one or two very large site allocations, is strongly recommended to improve the certainty of delivery; an uplift in the housing target to improve affordable housing delivery is also strongly recommended; and site allocations should include locations which will improve affordability in the local housing market.
	Recommendation 2: that the new Settlement Hierarchy should take environmental constraints around settlements into account in guiding the spatial distribution of development; and that the availability of services and facilities in all settlements outside but adjoining Test Valley's administrative boundary (so including Ludgershall) should be taken into account.

	Recommendation 3: that the Council's SHELAA should be amended in relation to Site 61: Land East of Ludgershall to properly reflect the accessibility of that site to services and facilities in Ludgershall and to the high frequency bus route between Salisbury and Andover.
Appendix 5	Shows how the revised Settlement Hierarchy, as proposed in the Settlement Hierarchy Assessment February 2022, is flawed.
Appendix 4	Details that my clients' site has not been assessed objectively by the latest SHELAA 2022.

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.