

# Test Valley Local Plan 2040: Regulation 18 Consultation Representations on behalf of the Ashfield Partnership

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**Client:** Ashfield Partnership  
**Project:** Test Valley Local Plan 2040 Regulation 18 Consultation (Stage 1)  
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## **Introduction**

On behalf of the Ashfield Partnership, we are pleased to offer the following positive comments on the draft Local Plan 2040 (LP 2040).

## **Chapter 2: Vision, Key Challenges and Objectives**

The Partnership supports the Vision and Objectives and Challenges for:

- Climate Change
- Our Communities
- Town Centres
- Built, Historic and Natural Environment
- Ecology and Biodiversity
- Health, Wellbeing, Culture, Leisure and Recreation
- Design
- Housing
- Economy, Employment and Skills
- Transport and Movement.

## **Chapter3: Spatial Strategy**

### Test Valley Sustainable Spatial Strategy

Paragraph 20 of the NPPF 2021 states that “Strategic policies should set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for...” housing, infrastructure, community facilities and address *inter alia* the natural, built and historic environment and climate change.

As drafted, the Strategy seeks to address some albeit limited elements of this. Noting that Spatial Policy 1 establishes the settlement hierarchy, it is considered that LP 2040 should identify overall levels of growth and other needs across the Borough and then direct appropriate levels of growth to settlements in the hierarchy.

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## Spatial Policy 1 (SSP1): Settlement Hierarchy

It is noted that a key diagram (as required by NPPF paragraph 23) is provided at Figure 3.1 to support Spatial Policy 1 (SSP1): Settlement Hierarchy.

The Partnership supports the inclusion of Romsey within Tier 1, as assessed at paragraph 3.29.

However and as noted above, LP 2040 as drafted offers no indication of how it will bring forward enough land in the right places and at the right times to meet objectively assessed needs. This is a key strategic consideration that would ideally have been addressed in this Regulation 18 Stage 1 consultation.

## **Chapter 4: Strategic Policy Framework**

### Strategic Policy 1: Countering Climate Change

The Partnership supports the “fabric first” approach to reducing the demand for energy from new development at paragraph 4.18 and part a) of Strategic Policy 1. It also supports the encouragement given to walking, cycling and the use of public transport at paragraphs 4.20 and 4.21 and part b) of Strategic Policy 1.

However, part a) implies that development will only be permitted where it utilises renewable and low carbon technologies.

The Partnership is proposing to construct new homes with air source heat pumps at Mountbatten Park Hoe Lane and also at Whitenap. Whitenap will be delivered over 10 years or more and will respond positively to prevailing Building Regulations and new technologies during this time.

However, the Partnership recommends caution in imposing a blanket requirement for renewable energy technologies in all new development, consistent with the more qualified approach taken at paragraph 155 of the NPPF. Alongside the benefits, paragraph 155 a) recognises the potential for adverse impacts such as landscape and visual associated with some renewable and low carbon energy technologies. This may be referring to photovoltaic or solar panels on domestic roofscapes. Policy should therefore support a range of renewable outcomes and have built-in flexibility to reflect local circumstances so as to avoid undesirable outcomes.

NPPF paragraph 155 b) presents an alternative way of addressing renewables. It suggests that suitable areas for renewable and low carbon energy sources such as solar farms and wind energy should be identified, presumably through development plans. On balance, the Partnership prefers the approach advocated in the NPPF.

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LP 2040 paragraph 4.34 refers to the impact on viability of policy proposals and the viability assessment that will be undertaken. The Partnership supports this and would welcome the opportunity to be fully involved in defining the terms of reference and parameters of this process. It would be pleased to offer up to date local evidence of related construction and materials costs to support the process.

## Strategic Policy 2: Delivering Healthy, Well-Designed Development

The Partnership supports Strategic Policy 2.

For public art (paragraph 4.58), the Partnership suggests that LP 2040 adopts a bespoke approach to providing public art on new developments, rather than a formulaic one. This will reflect better the specific circumstances of the site, the scale and nature of the proposed development and the aspirations of the landowner and developer(s).

For building standards, the Partnership notes that NPPF paragraph 154 b) seeks that local standards reflect national ones and recommends that this is reflected in any detailed policy.

## Strategic Policy 5: Delivering Infrastructure

The Partnership supports Strategic Policy 5, subject to the important caveat that infrastructure delivery must not prejudice development viability. It is considered that a reference to this should be included in Strategic Policy 5.

## Sustainable Transport and Movement

The Partnership supports the promotion of sustainable travel. However, all transport initiatives promoted in LP 2040 must be deliverable. In considering improvements to existing site allocation policies and new site allocations, the Partnership recommends that the potential to deliver associated transport infrastructure, including vehicular access and pedestrian and cycle connections to destinations throughout the settlement, is assessed thoroughly and that careful consideration is given to how best to frame the relevant policy so that it supports rather than prejudices delivery.

This is consistent with the advice of the Inspector examining the Revised Local Plan at paragraph 65 of his report dated 15th December 2015, which was that "...it is important that the links to the settlement are feasible and attractive."

The Partnership supports the approach of the Council to work with stakeholders such as Hampshire County Council and Network Rail (and presumably applicants?), to take a lead in facilitating the delivery of transport infrastructure.

## **Chapter 5: Meeting Our Needs**

### Housing

The Partnership may comment on the detailed policies and provisions in the Stage 2 consultation.

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### Economic

The Partnership considers that LP 2040 should be underpinned by robust up to date evidence of regional, sub-regional and local needs. The Partnership considers that meeting all these needs in a heavily constrained Borough is likely to be a significant challenge. Furthermore, forecasting and meeting the need for employment uses is complex and does not operate in the same way as housing need.

The Partnership supports mixed use development that co-locates housing and appropriate employment uses, as a key element of placemaking. This also promotes trip internalisation and reduces the need to travel.

However, with the possible exception of the withdrawn PPS 4 Planning and Economic Development (November 2010), planning policy has traditionally adopted an inflexible approach to the definition of employment uses. The Partnership supports a much more flexible approach to uses, especially on mixed-use developments, that create jobs but which may not be recognised by policy as being employment uses. These uses include schools, care facilities, market gardens, shops, walk-in financial and professional services, restaurants/cafes and health/medical facilities. The Partnership seeks acknowledgement that these uses can make an important contribution to local employment, especially when they form part of a mixed-use development.

Finally, the Partnership considers that new and amended site allocation policies that provide for new homes and jobs must be tested thoroughly to confirm that the level of development proposed can be delivered in physical and environmental terms, that development viability is not prejudiced and that the scheme achieves an appropriate balance and mix of uses that reflect wider provision in the surrounding area.

We ask to be kept informed of next stages of consultation and also that we have the opportunity to participate in any public examination of this document.