

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: [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)	Mr	First Name*	Jon
Surname*	Dunman		
Organisation* (If responding on behalf of an organisation)			

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:

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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

The purpose of primary planning legislation is to enable the building of housing. The Government has a housing target of some 300,000 homes a year, and for good reason. We are desperately short of housing and have not been building sufficient numbers for decades. This drives up the price of houses due to shortages and makes them less affordable for first time buyers

We have pressure on the requirement from

- **young people entering the market and not getting married as young as they used to so more single occupancy**
- **from split households due to divorce**
- **the general lengthening life expectancy of the population**

It is clear we have to build more houses

Unfortunately, this pressure does not fit well with those who wish to restrict the supply for whatever reason and appear to think that the planning process is there to stop the building of housing. Many arguments are used in terms of lack of services, destruction of the green belt (although most don't know the difference between green belt and green field), noise, views, harm to the environment etc etc

Sat in the middle of this mess is the poor local planning authority who have to try and make the best of a bad situation with a constant resource challenge, and knowing they cannot please all of the people all of the time. Sadly this does not just mean the local population, but also those on planning committees, some of whom are motivated by political considerations rather than the wider needs of the community they are meant to serve. Quite honestly, it must be fairly depressing for any planning department; and the thought of an application for 300 badly built square Persimmon boxes landing on your desk on a Friday afternoon, must be enough to make you wonder why you bother

However, if we accept that it is not possible to please all of the people all of the time, and that we can just do better than many other LPAs, we can get creative and at least take some of the sting out of the challenges. This requires some lateral thinking and perhaps a better understanding of

- **The Commercial side - Landowners, developers and land promotion agents and the real (as opposed to those that they tell you) commercial factors that are under the covers. They like any other organization are just trying to make a profit based on the rules that are around them. Many of these rules are in the gift of the LPA**
- **The Residents - How to mitigate all those challenges from NIMBYs, Greens etc etc**

So as an LPA you can create any policy you want. Yes of course there will be an Inspector looking over your shoulder, but they are not all daft. Under the right conditions you can ask a land promotion agent, land owner or developer for anything you want if you have a policy for it. Of course they will scream and tell you it makes the site unaffordable to develop etc etc. But honestly, this is just a negotiating tactic. If you understand the right point at which to influence what they are doing (and this is not during a reserved matters application as the commercials have long since been fixed), then if you have a policy for it, you will get most of it. All that happens is the farmer who was going to get £10m for his field now gets £9m. He will still be able to afford a Bentley

So what could you ask for and get if you could influence the process at the right point and have a policy that stacks up

Residents want shops, doctors, leisure facilities. Developers say they cost too much and often neither the developer nor the LPA understand what is really needed. Let's look at Abbotswood. We started with 5000 sq ft Convenience Store which would never work, because A, the law restricts them to 3000 sq ft and B, no retailer in their right mind would want one that large. All that is needed is a study paid for up front by the developer but controlled by the LPA to get it right. Now I know the developer will later come back and say there is no demand, can we build houses. Of course they will. Deal with it through a policy and cash up front. They will pay if you understand how their economic model works

Residents want some benefit from the S106 contributions. Abbotswood again. Who can possibly think that a herringbone block paving pavement to nowhere was a good use of the cash. The challenge is tough if you have no resources as an LPA to administer this. Get the developer to give you 2 years worth of a contract employee to do this for you. They will pay if you understand how their economic model works, and you have a policy

No one wants to look at square boxes on a road they have driven along for half their life. So tell the developer to edge the development with individually designed houses, made from reclaimed materials (environmental tick in the box), on larger plots etc etc. Make some of these self build plots to increase the diversity. Now no one will give you a medal, but look at those you achieved next to the Luzborough Inn, not bad, just take another step. The economics can work for the developer if you get to them at the right point. Yes there will be denser more boring dwellings in the centre of the site, but the general population will not see those every day and scream

Make developers work together. Yes I know they will hate it, but if you need a relief road and collectively they are told to sort it and pay for it, they will, if the LPA sorts the rules early enough so they have not overpaid for the land. But this all comes back to understanding how the economics of this works for them. It is not complex, but it is not what most people would think

Now quite reasonably as an LPA you may think that it is easier to get a great looking sceam from and SME builder. Yes that's often right, but major developers are used to carving up sites into parcels. Have a policy that the edge of the development has to be provided by an SME, so it is easy to get high quality diversity on that edge

I think you get the drift. Will it be a tough gig, yes. But understanding the economics of how these entities really work, generating the policies that go into the local plan and making sure that the developers understand them and you work with them rather against them, and perhaps one day we could get the TVBC Planning Department that medal!

Happy to provide more detail if required

Paragraph Ref	Specific Comments

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.