

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
[REDACTED] 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)	Mrs	First Name*	Sara
Surname*	Jones		
Organisation* (If responding on behalf of an organisation)	Claremont Planning Consultancy		

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:

Southern & Regional Developments

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

Claremont Planning are instructed by Southern & Regional Developments to submit representations to the Regulation 18 Stage 1 Local Plan in respect of their land interests at Bulbery Field, off Duck Street, Abbots Ann.

The site is located on the eastern side of Duck Street on the southern side of the village of Abbots Ann. It extends to approximately 3.25 hectares and is roughly triangular in shape. The site comprises an arable field that narrows to a point at its southern end and it is well contained. The site is located in a predominantly residential area with existing post-war housing to the north and west. Wider countryside extends beyond the eastern boundary, across which The Old Coach Walk passes and aligns with the eastern boundary of the site. Abbots Ann is a large village which offers a number of key services within walking distance from the site. Abbots Ann has a nursery school and Primary School that is located a short distance to the south-west of the site.

The site is identified in Appendix 4 of the latest SHELAA dated June 2021 and given the reference site 300 Land at Bulbery Field, Duck Street, Abbots Ann. It has few constraints to development as described in the accompanying Planning Report. It is considered that this site offers an excellent opportunity to provide additional housing in a sustainable location being in close proximity to the Primary School. In particular, the site offers the opportunity to provide a high quality mixture of open market and affordable housing provided within a landscape setting. A framework plan is provided with these representations that shows how the site could be developed in a sympathetic manner. The plan highlights areas of open space provision including a neighbourhood green, children's play area, gateway green, green corridor and pedestrian access to the wider green network. The layout illustrates meadow and habitat creation along with an area of SuDs that will improve the biodiversity benefits of the site. In addition to this is, an area laid out to accommodate a school drop-off car park at the southern part of the site is provided close to the site entrance but away from the housing located to the northern part of the site.

It is requested that the site is given due consideration for allocation for residential development in the next stages of the Local Plan process.

Paragraph Ref	Specific Comments
5.29	<p>The plan identifies that there has been support for the current approach of seeking 40% from larger market homes developments of 15 houses or more. However, before the LPA can identify a threshold for delivering affordable housing they need to update the evidence on the viability of delivering affordable housing.</p> <p>In terms of reaching a decision on the level of the affordable threshold to be applied in the forthcoming local plan policy, account should be taken of the viability and deliverability of provision, the Council should be careful about setting an over ambitious level that could compromise delivery. The policy should also take into consideration the potential changing needs over the plan period and avoid being too prescriptive in its approach. This will allow flexibility to respond to government policy such as First Homes and other discount tenures that may come forward.</p>
4.29	<p>Strategic Policy 1: Countering Climate Change has identified a number of measures that can assist in the mitigation and adaption to a changing climate.</p> <p>The development industry already provides many measures for carbon reduction and are at the forefront of tackling climate change through the introduction of sustainable construction and design techniques. The Council need to be fair and reasonable in their expectations in deciding how to implement local plan policies to assist in tackling the climate emergency. A number of measures including bio-diversity enhancement, improvements in landscaping, the sustainable use of resources and incorporation of electric vehicle charging points can be incorporated into development schemes without materially affecting the viability of a scheme. It is important to note that planning permission should not be withheld where some development proposals cannot provide on-site provision and the LPA need to be aware of different circumstances and ensure a flexible approach is provided.</p>
3.16	<p>Paragraph 3.16 states that the Council are seeking additional sites or further information on sites already identified in the SHELAA to be submitted as part of the consultation on this Local Plan.</p> <p>The site identified in these representations is included within the SHELAA as site ref 300, Land at Bulbery Field, Duck Street, Abbots Ann. In accordance with the comments above, it is requested that the Council take into consideration the attached Planning Report that sets out the background to the site's consideration along with the Framework Plan that illustrates how the site can be developed in a sympathetic manner.</p>

4.41

This paragraph sets out a number of key environmental topics which will be addressed further in the next stage of the Local Plan. In respect of landscape it is agreed that the Council should consider their approach in respect of protecting and enhancing valued landscapes including the North Wessex Downs AONB and the setting of the New Forest National Park.

Concern is raised in respect of the introduction of a policy that includes Local Gaps. These can be arbitrary and unnecessarily restrictive and could hamper the LPAs objective of enhancing the vitality and viability of its rural villages and areas. There is no requirement in national policy for the inclusion of local gaps and they are considered unnecessary and an overly restrictive policy.

In terms of Biodiversity Net Gain, it is considered that a policy that reflects the Environment Act requirement for 10% net gain on new schemes would be appropriate and this should be applied on-site, where feasible, whilst acknowledging that off-site provision may be suitable in some cases.

5.38

This paragraph suggests that for the next stage of the local plan process, the Council will consider whether a specific policy is needed on the mix of homes for both private and affordable housing informed by the outcomes of the SHMA.

It is suggested that any dwelling mix policy that is provided within the plan is not overly prescriptive and that a flexible approach should be adopted. There may be opportunities for housing mix to be negotiated on a site by site basis. If a very prescriptive approach is provided this could negatively affect development viability and obstruct developments from coming forward. The findings of the SHMA could produce a mix of dwelling types that becomes quickly out of date so this requires a flexible approach to be adopted.

5.14

The LPA is suggesting that they are utilising the standard method of 541 homes per year from 2020 onwards to calculate the housing requirement over the plan period giving a total of 10,820 between 2020-2040. Concern is raised that this figure is insufficient and does not allow for a flexible approach to be adopted. This is considered to be a particularly low level of housing provision that will not result in a sustainable long-term distribution of growth. Using a reduced figure for housing land would not accord with national planning policy advice at paragraph 60 of the NPPF, where the government's objective is to significantly boost the supply of homes. It is suggested that this approach would hamper the ability to provide a sufficient amount and variety of land to come forward where it is needed.

Planning Practice Guidance states that the standard method provides a **minimum** number of homes to be planned for and is the starting point when preparing the housing requirement in the plan. As currently drafted, it is considered that the plan does not demonstrate an aspirational approach to housing delivery where housing can be

boosted and the strategic requirement not only met but exceeded. This is not considered to be an effective approach that can guarantee consistent delivery or the flexibility to ensure that delays of delivery of large sites can be taken into account. As currently drafted, the plan has failed to consider other reasonable alternative strategies for housing development

The plan has identified particular concerns regarding housing supply and affordability particularly in the rural areas. It is considered that the plan should take these issues into account and sufficient land is provided to tackle these issues to ensure that the rural areas are supported and sustained in accordance with the Council's own vision. In further stages of the Local Plan's preparation small and medium sites should be allocated that can be delivered quickly without significant infrastructure costs.

The Sustainability Assessment has identified that the scale of growth identified using the Standard Method will deliver affordable homes, however the specific scale of growth is not yet known. Concern is raised that this is not an appropriate strategy for dealing with affordable housing provision that has been identified as a problem within the rural areas.

The Sustainability Assessment has confirmed that in order to meet the scale of growth envisaged using the standard method, this will require greenfield development to deliver the housing figure in both of the Housing Market Areas. Given the predominantly rural nature of the Borough this is not a surprise and should be an anticipated requirement for the Council to fulfil its housing needs.

The preparation of the Local Plan provides the opportunity to review appropriate sites for development and ensure a long-term vision for the local plan area is provided for. It is imperative therefore for the local planning authority to review their housing requirement figures and allocate new and deliverable sites to meet the long-term needs for the area.

**3.13 &
3.17**

Paragraph 3.13 recognises that communities already have the opportunity to shape their areas through Neighbourhood Plans, Neighbourhood Development Orders and Village Design Statements. It states that this strategy supports communities in identifying and shaping site allocations to meet their local needs. Paragraph 3.17 states that the LPA are seeking comments on the role Neighbourhood Plans could play in allocating sites.

Whilst the importance of Neighbourhood Planning is recognised, it is considered that the Local Plan plays an important role in allocating sites within villages and the rural area and concern would be raised if all allocations for housing development in these types of locations were solely left to the Neighbourhood Plan process. It is considered imperative that the Local Plan identifies and allocates sites in these locations to ensure that housing needs are met and villages are

<p>2.28 – 2.30</p>	<p>sustained throughout the lifetime of the plan and beyond rather than leaving this to the Neighbourhood Plan process. There is a role for Neighbourhood Plan's to allocate sites but this should be in addition to those identified in the Local Plan.</p> <p>The text identified above paragraph 2.28 considers Test Valley's communities. This recognises the need to deliver and strengthen sustainable cohesive and healthy communities in the towns and villages. Paragraph 2.29 identifies the fact that in rural areas, sustainable access and the level of facilities and services varies between settlements and recognises that it can be a challenge to help sustain the range of existing facilities and infrastructure and to facilitate the enhancement of them is an even bigger challenge. Paragraph 2.30 sets out that the Local Plan 2040 will be able to identify the location of new development and the resultant increase in population can help to sustain the vibrancy of rural communities through helping to keep existing facilities and services to meet daily needs.</p> <p>It is considered important that the Local Plan not only focusses on the larger settlements in the Borough but also supports the viability of villages and rural communities. One way of assisting in this is by allocated sites for a mix of open market and affordable housing that can help sustain village communities and support local schools, services and facilities. The site at Bulbery Field, off Duck Street, Abbots Ann is one such site that could accommodate housing needs and local benefits to the community. This would support the Local Plan's objectives and support the future viability of the settlement of Abbots Ann.</p>
<p>5.33</p>	<p>The Council identifies that national planning policy provides for Rural Exception Sites for the development of affordable housing where this would not normally be permitted. The current local plan only permits schemes of 100% affordable housing. It is considered that the review of the plan provides the opportunity to review the Rural Exception policy. It is suggested that a more flexible approach would be to allow for an element of market housing to be included within any Rural Exception policy. This would be a proactive policy that could assist in delivering much needed affordable housing in the rural area and make sites more viable that would otherwise be left undeveloped. Affordability issues in the rural area have been identified as an issue within the plan area and a flexibly worded policy allowing for an element of market housing could assist in realising this requirement.</p>
<p>3.12</p>	<p>Paragraph 3.12 states that in order to support and sustain vibrant and healthy communities, the spatial strategy identifies a wider distribution of development than set out in the current Local Plan 2029. The text recognises that much of the Borough is rural with some villages meeting immediate needs and the strategy in the emerging plan aims to the rural settlements to develop in a sustainable manner. The plan recognises that the rural areas face challenges in terms of housing supply and affordability, in which the strategy can help to overcome.</p>

<p>4.118</p>	<p>Support is given to the changing emphasis of the spatial strategy in the emerging plan. The previous Local Plan 2029 placed a lot of emphasis on focussing development on the largest settlements of Andover and Romsey and whilst these locations are still identified as a focus for development, given their sustainability credentials, it is considered important that a better distribution is provided to the villages and rural areas within the Borough. In particular, villages such as Abbots Ann provide a range of services and facilities and can support housing growth to ensure their long term viability is protected.</p> <p>The Council's draft policy on 'Delivering Infrastructure' requires the provision for necessary on-site infrastructure requirements and where appropriate off-site provision. Development proposals will be required to directly provide infrastructure and/or a financial contribution which will be secured through a legal agreement.</p> <p>The Council does charge a Community Infrastructure Levy (CIL) the amount is calculated per square metre of net additional floor area of development. This is in addition to securing on-site delivery of infrastructure and securing monies through developer contributions to deliver infrastructure. The LPA need to be aware that some development sites may be required to provide infrastructure of a scale and cost that may affect the viability of the development. Where there are large CIL and/or S106 requirements or site remediation costs, the LPA may have to accept that the provision of some infrastructure requirements may need to be reduced. It is considered that the LPA need to be flexible in relation to financial viability and this should be reflected in any policy going forward.</p>
<p>5.16</p>	<p>The Council has a long-standing split regarding housing needs recognising the geography of Test Valley and the fact that it contains two distinct housing market areas. The northern housing market area concentrates housing around Andover and the northern part of the Borough. The southern housing market area concentrates development around Romsey and has a close relationship with South Hampshire. The emerging plan continues the approach of identifying the two distinct housing market areas but with a revised boundary. This recommends a split around the route of A30. The split of the housing requirement would be based upon the amount of population within each area. This would result in 57% of the housing requirement being met in Northern Test Valley and 43% in Southern Test Valley. The plan suggests that in the next stage of the plan process at Regulation 18, Stage 2 additional work will be undertaken in relation to the distribution of development, including housing need within the Borough. This may identify additional approaches to distributing the housing need within the Housing Market Areas. This could include a further split into four sub areas reflecting the more urban and rural areas.</p> <p>The approach of splitting the Borough into two Housing Market Areas seems sensible and follows the previous local plan strategy. If the Council decide to split the HMAs into further sub areas, it is considered</p>

	<p>that this should not be at the expense of restricting development in the rural villages. The plan has identified an approach to support development in the rural areas accordingly, any further sub areas should reflect this desire. Villages that have a close association in terms of proximity to larger settlements should be recognised as being able to provide additional levels of housing provision. This includes Abbots Ann that is located within 4.5km to the services, facilities and employment provision of Andover.</p>
<p>3.36</p>	<p>It is considered that the identification of the five tier system within the Settlement Hierarchy is preferable to the four tier approach within the adopted Local Plan in 2016. In particular, it is considered important to differentiate between the villages and the services they provide. Previously in the 2016 Plan, all villages were considered together as 'Rural Villages' in the Settlement Hierarchy under 'Key Service Centres' and consequently this meant that the more sustainable villages were not recognised as having the ability to provide levels of housing commensurate with the level of facilities and services provided.</p> <p>In respect of Abbots Ann it is considered that the identification of existing facilities and services appears to be accurate within the Settlement Hierarchy Paper. In respect of the 6 key facilities and levels of public transport these seem to be an appropriate measure to differentiate the rural settlements. It is considered that by having a food store, public house, primary school, outdoor sports facility, community or village hall and place of worship these key facilities ensure that villages can run day to day services and have the ability to grow commensurate to their size to ensure the viability of these villages is maintained.</p> <p>The area where we would have some concern however is how settlements have been assessed in terms of how they can access services and facilities available in a nearby settlement due to their proximity. It is clear that Abbots Ann performs well in this regard given the fact that Andover which is a Tier 1 settlement and one of two of the largest settlements in the Borough is only approximately 4.5km north-east of the village. Access from Abbots Ann to Andover is good via public transport and the private car and recognition of these links should be made within the Plan.</p>
<p>2.21</p>	<p>The Vision identifies that by 2040, Test Valley Borough's communities will be prosperous and resilient by providing access to good quality homes that meet a range of needs and aspirations, including affordable housing.</p> <p>This part of the Council's Vision is supported. In particular, it is considered that the Local Planning Authority should identify a range of sites of different sizes to assist in this Vision. This would accord with paragraph 69 of NPPF that recognises that small and medium sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. It is</p>

	<p>considered that the site at Bulbery Field, off Duck Street, Abbots Ann could assist in meeting this part of the Council's Vision as it offers the opportunity to provide good quality open market and affordable homes in a landscape setting.</p>
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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.