

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)	Mr	First Name*	Peter
Surname*	Crozier		
Organisation* (If responding on behalf of an organisation)	Fowler Architecture & Planning		

Please provide your email address below:

Email Address*	[REDACTED]
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Alternatively, if you don't have an email address please provide your postal address.

Address*	[REDACTED]	
	Postcode	

If you are an agent or responding on behalf of another party, please give the name/company/organisation you are representing:

Vivid Housing Ltd., [REDACTED]

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
<p>On behalf of its client, Vivid Homes, Fowler Architecture & Planning has previously prepared representations for the SHELAA with respect to the site referenced as 'Land at Barrow Hill, Goodworth Clatford'. Those representations, dated 30/09/2019, are attached at Annex 1 to this comments form, and are relevant to the representations submitted in the following Section.</p> <p>As well as representations made with respect to the SHELAA, Fowler Architecture & Planning also submitted a pre-application enquiry with respect to this site in March 2021, the response to which was received in August 2021.</p> <p>The representations made below with respect to the Draft Local Plan 2040 (Reg18, Stage1) where appropriate draw on this evidence and detail submitted previously, as well taking into consideration the supporting evidence to the Draft Local Plan, in particular the Settlement Hierarchy Assessment.</p>

Paragraph Ref	Specific Comments
2.21	We support the general vision and aims of the Draft Local Plan (DLP).
2.53	We support the general aim of providing homes that are fit for purpose and meeting different needs, including the provision of affordable housing.
2.54	We note the stated housing need figure of: <i>“currently 541 homes per annum, which provides the minimum housing need to be identified in the Local Plan 2040.”</i> We acknowledge that this is stated as a <i>minimum</i> figure, but please see comments below regarding the appropriateness of the stated minimum figure of 541.

3.19	We concur with the overall approach to directing development to more sustainable locations through the adoption of a 'settlement hierarchy' approach.
3.24	Noting that the ranking within the hierarchy: <i>"does not indicate whether there is suitable land for development in that location, or that environmentally it would be appropriate,"</i> we would refer to the representations made to the SHELAA with respect to the site referenced as 'Land at Barrow Hill, Goodworth Clatford'. Those representations confirm that: <i>"There are no constraints that would preclude the suitability of the land for the proposed development."</i>
3.32 & Spatial Strategy Policy 1	We support the designation of Goodworth Clatford as a Tier 3 settlement, which is based on robust analysis and evidence, as set out in the supporting 'Settlement Hierarchy Assessment' document.

5.1 – 5.7

These paragraphs reference the national planning policy context regarding the delivery of housing. To support the government's objective of significantly boosting the supply of homes, paragraph 60 of the National Planning Policy Framework ('the Framework') confirms it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. Paragraph 61 establishes the basis for establishing the number of new homes for each LPA, stating:

"To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for."

There is a clear expectation that LPAs should establish a housing requirement figure for their whole area, as confirmed at paragraph 66:

"Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. Once the strategic policies have been adopted, these figures should not need re-testing at the neighbourhood plan examination, unless there has been a significant change in circumstances that affects the requirement."

The NPPF thereafter places obligations on LPAs to maintain supply and delivery of homes, including a requirement to provide at least 5 years supply of housing.

"Strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period, and all plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of 5 years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than 5 years old. The supply of specific deliverable sites should in addition include a buffer (moved forward from later in the plan period) of:

- (a) 5% to ensure choice and competition in the market for land; or*
- (b) 10% where the local planning authority wishes to demonstrate a 5 year supply of deliverable sites through an annual position statement*

	<p>or recently adopted plan, to account for any fluctuations in the market during that year; or</p> <p>(c) 20% where there has been significant under delivery of housing over the previous 3 years, to improve the prospect of achieving the planned supply” (para. 74).</p> <p>As per paragraph 74 of the Framework, current Housing Land Supply in Test Valley is on the basis of the Revised Local Plan (RLP) for determining the housing requirement for the period 2011 to 2029. Policy COM1 sets out that the housing requirement for the Borough is a minimum of 10,584 homes. Their delivery will be met through completions, commitments, unplanned development and the allocation of strategic sites (i.e. 588 per annum).</p>
5.10 – 5.21	<p>We note the local housing need figure of 541 homes per annum from 2020 onwards, broken down as 233 per annum in Southern Test Valley and 308 in Northern Test Valley; this compares to figures of 194 and 394 respectively under the currently adopted Local Plan. We also note however, that this is a minimum figure and that para. 5.25 states that further consideration will be given as to: “...whether we need to allocate for a higher number of homes above our minimum housing requirement in order to provide for greater resilience in maintaining sufficient supply of sites.”</p>
5.25	<p>In the context of the latest Housing Implementation Strategy (April 2021), which confirms that the LPA has just 5.72 years of housing supply (Table 7 at 8.23) in Northern Test Valley, we would maintain that the figure of 541 would not be sufficient to ensure a resilient supply of sites over the Plan period, particularly across the Northern area where the annual supply is projected to reduce from 394 to 308. This lack of resilience should be reflected in the Regulation Stage 2 consultation and the annual housing need figure which is taken forward.</p>
5.27	<p>We note that this paragraph confirms that: “<i>The distribution of future housing will be addressed at the next stage of the Local Plan 2040 through setting out our draft site allocations.</i>” In this context, we would re-iterate the confirmation set out above, and made previously with respect to the SHELAA consultation, regarding the suitability and availability of the ‘Land at Barrow Hill’ site in Goodworth Clatford, which sits at Tier 3 in the settlement hierarchy, and as such represents a sustainable and suitable location for future housing.</p>
5.29 – 5.31 & 5.37 - 5.38	<p>We note that the new SHMA: “... identifies a higher need for affordable homes per year, than identified in our Adopted Local Plan 2029,” and that this will be subject to separate study and evidence in due course. Our client therefore reserves their right to submit further representations on this in any future Local Plan consultation, as well as with respect to any future draft policy regarding proposed housing mix.</p>

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.

SHELAA Review Proforma

Below are a number of important housing delivery monitoring questions, we would be grateful if you could answer based on latest available information.

A - Site Details

Site Name	Land at Barrow Hill			Site Ref	64
Settlement	Goodworth Clatford				
Parish/Ward	Goodworth Clatford				<input type="checkbox"/> Complete
Owner Details	EB Scott Will Trust				<input type="checkbox"/> Complete
Agent Details	Fowler Architecture & Planning Ltd [REDACTED], [REDACTED], [REDACTED]				<input type="checkbox"/> Complete
Developer Interest?	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	Details	VIVID Homes	
Is the site immediately available?	<input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	If yes, is the site for sale/being marketed?	<input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes
					<input type="checkbox"/> Complete

B - Site Size/Capacity

Total Area (Ha)	Developable Area (Ha)	Average Density (Dph)	<input type="checkbox"/> Complete
2.9	2.9	10	

C - Planning Status

Planning Permission	Application Ref	Date of Approval	Start Date (Expected)	Expiry Date
<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes				
				<input type="checkbox"/> Complete

D - Proposed Land Use

Residential <input checked="" type="checkbox"/>	Number of dwellings?	30 dwellings			<input type="checkbox"/> Complete
Self-build or custom build housing	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Element		
Employment <input type="checkbox"/>	Floor Space (m²)	170 m ²			
Retail/Leisure <input type="checkbox"/>	Floor Space (m²)	m ²			
Mixed	Residential <input checked="" type="checkbox"/>	Commercial <input checked="" type="checkbox"/>	Leisure <input type="checkbox"/>	Other <input type="checkbox"/>	
Travellers, including Traveller Showpeople <input type="checkbox"/>	Number of Pitches				

E - Site Analysis

Current Land Use	Agricultural - arable			
	Brownfield <input type="checkbox"/>	Greenfield <input checked="" type="checkbox"/>	Combination <input type="checkbox"/>	<input type="checkbox"/> Complete
Infrastructure e.g. Utilities/Services Drainage/Sewerage	Infrastructure and services available on Barrow Hill. The consultee responses to 14/03004/OUTN did not raise any infrastructure reasons why the site is not suitable for the proposed development.			

		<input type="checkbox"/> Complete
Access/Highways	Vehicular access can be created onto Barrow Hill. The consultee responses to 14/03004/OUTN did not raise any highways reasons why the site is not suitable for the proposed development. See enclosed Transport Statement for indicative access design.	<input type="checkbox"/> Complete
Capital Works	There are no known abnormal capital works that would be required to facilitate the proposed development of the site. All required works are those which are typical for a greenfield residential development that has a frontage onto the publicly maintained highway.	<input type="checkbox"/> Complete
Ownership/Viability	The site is in a single ownership with no ransom strips that would impact on the availability and viability of development. The EB Scott Will Trust have entered into an agreement for Vivid Homes to promote the land for development, including enabling the submission of a planning application if appropriate.	<input type="checkbox"/> Complete
Environment e.g. SSSI/SINC/Flooding	The site is not subject to any national or local environmental designations. It is located outside areas at risk from flooding. It is located outside of any designated heritage assets.	<input type="checkbox"/> Complete
Other Constraints	None	<input type="checkbox"/> Complete

F - If there are any constraints identified above, how will these be addressed?

There are no constraints that would preclude the suitability of the land for the proposed development	<input type="checkbox"/> Complete

G - If the site is not immediately available when will it be available from?

Available Now	2019/20	2020/21	2021/22	2022/23	2023/24	6 – 10 years (2024-2029)	11 – 15 years (2029-2034)	Beyond 16 years (2034-)	<input type="checkbox"/> Complete
Yes									

H - Once commenced, how many years do you think it would take to develop the site?

Estimated number of residential units/floor space/pitches etc. that the site could accommodate
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2019/20	2020/21	2021/22	2022/23	2023/24	6 – 10 years (2024-2029)	11 – 15 years (2029-2034)	Beyond 16 years (2034-)	<input type="checkbox"/> Complete
0	10	20	0	0				

I - Indicate all factors taken into account in the above projected completion rate:

A deliverability of a 30 unit scheme would likely proceed over a 2 year period with completions running at 10 in year 1 and the residual in year 2.

Complete

Please provide any further information which may be of assistance to the Council in evaluating this site as an attachment.

Signed: Aaron Smith

Date: 30.09.2019

Location Map

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