

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*	Jacob
Surname*	Goodenough		
Organisation* (If responding on behalf of an organisation)	Nova 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	[REDACTED]

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

Stratland Commercial Limited

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

At this point in time, the draft plan has not set out any economic requirements to 2040.

It is understood that the evidence of economic and employment land requirements is currently being updated and further tested, although the current employment land supply is known, and the projected employment requirement to 2040 has been estimated through the PfSH study. It is indicated that this further work will inform the emerging spatial strategy and local plan policies at the next stage of the plan (Regulation 18, Stage 2).

Section 6 of the NPPF advises that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. It considers that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

Paragraph 106 of the NPPF notes that planning policies should support an appropriate mix of uses across an area and within larger scale sites, to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities.

It will be important to ensure that the proposed housing requirement, and number of jobs this would support are aligned to ensure sustainable patterns of growth over the plan period. It will also be important to consider the opportunities to help meet wider sub-regional economic needs.

In this context, we are supportive of the revised approach to the Housing Market Areas and the proposals to define an urban area in southern Test Valley to reflect this area's well-established commercial and demographic relationships with Southampton and the wider Functional Economic Market Area (FEMA) of the PfSH area.

Preserving Romsey within Tier 1 of the Settlement Hierarchy is supported and reflects its long-standing role as the primary settlement in Southern Test Valley, offering a broad range of primary and secondary facilities, as well as excellent public transport connectivity. Aligning housing requirement and economic growth in the town will be essential.

Our client, Stratland Commercial Limited, controls land east of Premier Way, adjacent the allocated employment site at Abbey Park Industrial Estate, Romsey. It is considered that Romsey can accommodate a high level of development that would be commensurate to its position in the hierarchy and in order to reinforce its role in the southern Test Valley. Our client's land is well related to the existing business park and is unconstrained. It is deliverable and developable in the short term, and it represents a suitable site for allocation in Romsey to meet the economic needs of the area.

Paragraph Ref	Specific Comments
<p>Meeting our Economic Needs (para 5.48 – 5.61)</p>	<p>Meeting Our Economic Needs</p> <p>At this stage, the plan is not setting out any economic requirements to 2040. However, comments are invited about the approach to establishing the employment land requirements for the Borough.</p> <p>In considering the forecasted requirements for the Borough the draft plan notes the limitations of the methodology which has derived a very high level of forecast future growth for Test Valley. Whilst the limitations on trend-based data is acknowledged, the PfSH Economic, Employment and Commercial Needs Study (March 2021) anticipates that a proportion of this requirement will still need to be met in Southern Test Valley as it forms part of the FEMA of the wider PfSH area. It also advocates a cautious yet positive strategy for new space to be provided for office job growth. It is understood that PfSH is undertaking further work within the FEMA to consider this further.</p> <p>We support the further testing of the needs but consider that a positive approach should be adopted in line with the recommendations of the March 2021 PfSH study and guidance contained within the NPPF.</p> <p>Critically we consider that it is important to ensure proposed housing requirements, and number of jobs this would support are aligned to ensure sustainable patterns of growth over the plan period. It will also be important to consider the opportunities to help meet wider sub-regional economic needs.</p> <p>In order to ensure that the emerging Local Plan meets the tests of soundness, it is essential that it is positively prepared. Test Valley will need to work closely with neighbouring authorities to address the economic needs of the FEMA, as set out in national policy. Test Valley should also have regard to slower than anticipated delivery and potential under delivery on larger strategic employment allocations such as Whitenap under current policy LE3.</p> <p>We reserve the opportunity to comment at future stages of the Local Plan development as further evidence emerges on the anticipated employment needs of the Borough.</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.