

# 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](http://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](http://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*	Caroline
Surname*	Jezeph		
Organisation* (If responding on behalf of an organisation)	BJC Planning		

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:

Moon River Ltd
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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**

**Attention is drawn to the following points:**

#### **“Meeting Housing Demand”: Report published by The House of Lords Built Environment Committee**

The House of Lords Built Environment Committee has published “*Meeting Housing Demand*”, a new report with a set of recommendations for government to support new housing delivery to combat the “expensive, unsuitable and poor quality” homes that most people live in.

As well as calling for an increase in money spent on social housing, the report singles out the crucial role that Small to Medium-Sized (SME) housebuilders have in building more and better homes. It also cites their vital role in diversifying the market. It states that:-

**“SMEs should be supported through reduced planning risk, making more small sites available, and increased access to finance,” states the report, which also puts forward recommendations to create a fast-track planning process specifically for SMEs that would help reduce delays and planning risk.”**

#### **Self Build and Custom Build Housing.**

The Local Plan should make specific reference to the importance of providing sites for self build and custom build housing. This form of housing can meet the need for homes that require minimal energy inputs and help to meet the zero carbon challenge and climate change issues. High levels of home insulation are especially beneficial for the older members of society, who are more susceptible to the cold.

Self build and custom build housing can provide the highest standards of construction and design thereby providing highest quality of development.

This form of housing can reach net zero standards. The housing can meet the requirements of fabric first and the need to provide natural ventilation. This form of housing will meet the needs of people for much longer than major developers house types.

### **Downsizing**

Another important factor in the market that the report refers to is the ageing population, with the knowledge that a quarter of the UK population will be over 65 by 2050, up from 19 per cent in 2019. Test Valley has a figure of 22% and thereby above the national figure. At the present time, many of these older people remain in unsuitable, under-occupied homes, effectively family-sized homes that fail to come on to the market. This creates a bottle-neck at the top of the market due to a lack of suitable downsizing properties.

It is important that the Local Plan facilitates “downsizing”.

### **Housing Market Areas**

The change in the split in the Housing Market Areas makes more sense and it is more logical.

### **Business Hubs**

It is also important that the Local Plan refers to the need for business hubs to be provided in the rural areas. We are moving as a society to high levels of home working but not everyone has a room to accommodate an office. A local hub could not only provide space but a meeting of minds that could generate the seed corn for new businesses.

Community Centres could be adapted to meet the needs of local people. Supplementary shopping provision can be provided. This could reduce the need for the older residents to travel to larger centres and avoid isolation.

Paragraph Ref	Specific Comments
Para 3.12	<p>Spatial Strategy</p> <p>The spatial strategy includes greater support for rural settlements. This is an important change of emphasis from the previous Local Plan and is welcomed. The restriction upon development in the rural settlements in recent years has led to the decline of local services and an ageing of the populations, as there has been little opportunity for young families to take up residence.</p> <p>In principle the Councils Sustainable Spatial Strategy is supported. However, when more specific policies emerge at Stage 2 further comments may be made.</p>
Para 3.16	<p>Para 3.16 invites comments upon the spatial strategy:- It is noted that the Spatial Strategy set out on Page 29 states inter alia;</p> <p style="padding-left: 40px;"><b>‘Delivering vibrant and resilient towns at Andover and Romsey through: Promoting the town centres as destinations....</b></p> <p>The presumption is that the towns will act as magnets for the population in the surrounding hinterland. It has to be assumed that it is to the villages and settlements in closest proximity that the towns will act as magnets.</p> <p>Settlements such as Braishfield, Michelmersh and Timsbury are well placed to access and support Romsey.</p>
Para 3.19	<p>Settlement Hierarchy</p> <p>The concept of the hierarchy is supported as a means of assessing the settlement types. However, the actual hierarchy is partially flawed in its assessments and conclusions as set out further below.</p>
Para 3.21	<p>The statement in paragraph 3.21 is particularly endorsed.</p> <p style="padding-left: 40px;"><b>Test Valley is predominantly rural in nature and has a number of smaller settlements. In rural areas, planning policies and decisions should be responsive to local circumstances, support housing developments that reflect local needs and identify opportunities for villages to grow and thrive, especially where this will support local services.</b></p>
Paras 3.23-3.28 Appendix 1	<p>Settlement Hierarchy Assessment</p> <p>The Settlement Hierarchy Assessment explains the details of the survey and the assessment which was the determinant in the proposed hierarchy.</p>
Settlement Hierarchy	<p>The Assessment commences with some extracts from the National Planning Policy Framework. Of the chosen extracts paragraphs</p>

<p><b>Assessment Topic Paper</b></p>	<p>79,84, 105 and 114 of the NPPF stand out as particularly supportive of addressing the needs of rural communities.</p>
<p><b>Para 4.126</b></p>	<p>The identification of the 6 key facilities, which are determinants in the formation of the hierarchy, is important. The first 5 key facilities plus access to public transport provide a reasonable measure of services which are valuable to most residents. However, the category of place of worship has little relevance in today's society. It should be placed in another category, such as village or community hall. Attendance at Church has been declining for decades and is not really a relevant criterion for assessing a settlement.</p> <p>The Local Plan rightly places considerable emphasis on all forms of sustainability including that of sustainable transport. This is important in the context of the Council's declaration of a Climate Emergency. The inclusion of access to a good level of public transport is an important construct of sustainability. However, another criterion, the use of the bicycle, is completely missed. Why is accessibility to good cycle routes not a key consideration? This should be included.</p>
<p><b>Figure 3.1</b></p>	<p>This paragraph is relevant in the context of considering the encouragement of cycling. It refers to the Department of Transport publication which envisages better cycling and walking infrastructure being placed at the centre of transport, place-making and health policies. It also refers to the investment in local cycling and walking connections and infrastructure.</p>
<p><b>Figure 3.1</b></p>	<p>Reference to the plan on Page 34 of the Local Plan indicates just how many of the rural settlements are within reasonable cycling distance of tier 1 and 2 settlements. The provision of dedicated cycleways, such as the one serving Michelmersh and Timsbury to the edge of Romsey, are important infrastructure measures that need to be considered in the hierarchy assessment. Furthermore, the provision of further such infrastructure would facilitate good access to smaller settlements which are satellites to the tier 1 and 2 settlements, for example Braishfield.</p> <p><b>Braishfield</b></p> <p>This dispersed settlement lies just to the north of Romsey. It is identified as having 6 key facilities. It has some local services and facilities but the settlement has not had the opportunity to expand due to the constraining impact of the current Local Plan. Growth in this settlement would allow for some consolidation of the dispersed settlement and provide additional population to support existing services and facilities.</p> <p>Braishfield is not in a remote or unsustainable location it is a settlement which has much to offer. The site being promoted by this respondent lies towards the south of Braishfield and just 4km from Romsey station, an easy distance to cycle.</p>

**Para 3.31**

**Chilworth**

The justification for raising this settlement to the level 2 tier is puzzling and unjustified. The settlement scores just 4 key facilities and M in terms of public transport. It is the proximity to the Southampton Science Park, Eastleigh, Chandlers Ford and Southampton which are said to justify the tier 2 status. However, the distances below do not suggest a particularly close proximity which suggests that the settlement is justifiably more sustainable.

However approximate measurements by road indicate:

Chilworth	Chandler Ford	5.1km
Chilworth	Eastleigh	5.4km
Chilworth	Southampton	6.9km
Braishfield	Romsey	5.5km
Michelmersh	Romsey	5.4km
Timsbury	Romsey	4.3km

Given the above distances it is very difficult to see any justification for inflating the status of Chilworth.

**Paras 5.18 - 5.21  
Figure 5.1**

The proposed revision to the Housing Market Areas is supported. This appears to be a much more realistic division between the market areas around Andover and Romsey. A split of 57% and 43% of the housing requirement is welcomed.

*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.