

Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 2

COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 2 document for public consultation. This consultation document sets out a vision for Test Valley up to 2040, objectives for achieving this vision, our development needs alongside allocations for residential and employment development and theme-based policies.

The consultation period runs from Tuesday 6th February to noon on Tuesday 2nd April 2024. 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 below by **noon on Tuesday 2nd April 2024**.

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: 01264 368000

Website: www.testvalley.gov.uk/localplan2040

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Mr	First Name*	steve
Surname*	lees		
Organisation* (If responding on behalf of an organisation)	Steveleesplanning ltd		

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:

Timsbury Holdings Ltd

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 until the Local Plan 2040 is adopted and the Judicial Review period has closed and will then be securely destroyed.

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 here:
<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

Part B: Your Comments

Please use the boxes below to state your comments. This includes one box for general comments and another for specific comments related to an area of the Local Plan.

Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box below.

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

For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible. Please use the box below.

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.

Paragraph Ref	Specific Comments
	<p>Policy SS3 Support</p> <p>Policy SS4 Object</p> <p>Policy SS5 Object</p> <p>Policy HOU2 Object</p> <p>See below</p> <p>Summary</p> <p>Policy SS3 Housing Requirement. Support.</p> <p>The inclusion of Michelmersh and Timsbury in the proposed Southern Test Valley Housing Market Area boundary is supported</p> <p>Policy SS4 Rural Housing Requirement. Object</p> <p>The policy does not address the housing needs of rural communities in the borough</p> <p>Policy SS5 Neighbourhood Development Plan Housing Requirements. Object</p> <p>The methodology outlined in paragraph 3.89 should be revised to include: local housing issues, affordability, characteristics of the local housing stock, including availability of affordable housing and community engagement and support.</p> <p>The decision on the housing requirement to be met by a neighbourhood plan should be made in consultation with the lead body, such as a parish council. The timing of the decision should allow for local evidence and views of the community to be part of the process.</p> <p>Policy HOU2 Community led development. Object</p>

The policy sets out a framework which is too inflexible and too demanding on rural communities to enable locally led schemes to be delivered. The policy as drafted is unlikely to be deliverable from a developer/landowner perspective.

Response

Policy SS3 Housing Requirement.

2.The inclusion of Michelmersh and Timsbury in the proposed Southern Test Valley Housing Market Area boundary is supported. The settlements are located close to Romsey which is a Tier 1 settlement with access to a wide range of services and facilities. There are strong linkages with Romsey including: education (Romsey School), health facilities (GP surgeries and Romsey Hospital), employment and leisure facilities.

Policy SS4 Rural Housing Requirement

3.The rural housing requirement has been arrived by adding the existing supply of homes and proposals in neighbourhood plans which have reached at least the Regulation 14 stage. There does not appear to have been any analysis of the housing needs of rural Test Valley communities such the issue of affordability or type and tenure of homes., as highlighted in the Housing Market Areas Study, January2022, and Strategic Housing Market Assessment January 2022

Conclusion

4.The local plan approach under Policy SS4 does little to assist address the housing needs of the rural communities in the borough. The Policy should be reviewed and a reflect a more positive approach to addressing the housing needs of the rural communities in Test Valley.

Policy SS5 Neighbourhood Development Plan Housing Requirements

5.The housing element of the spatial strategy of the local plan has a focus on the largest settlements i.e.; Tier 1 and Tier 2 where allocations are considered appropriate. For Tier 3 and Tier 4 settlements any new housing sites would be delivered either as allocations in a neighbourhood plan, Policy SS5, or as an exception site i.e.; via Policies HOU2, HOU3 and HOU4.

6.Paragraph 2.36 of the local plan highlights the role neighbourhood plans will play in the planning of the borough.

‘The Local Plan 2040 is seeking to strengthen the role of community- led planning through supporting communities to bring forward locally-driven schemes through the use of community planning tools such as Neighbourhood Plans.’

7.The local plan is relying on the neighbourhood plan process to deliver additional housing opportunities in rural Test Valley. ref paragraphs 3.73 and 3.87. TVBC will provide a housing figure when a new neighbourhood area is designated or on the commencement of a review of a made plan. However, this does not present community-led approach which is what the local plan sets out to do.

8.The proposed timing of the decision to provide a housing figure, or not, is considered to be too soon in the process. Local communities should have the opportunity to assemble information and the views of the community on the key issues such as housing provision, and to discuss them. This approach would mean that the assessment of the merits of a housing requirement would be led by the community rather than a technical exercise undertaken by TVBC.

9.Paragraph 3.89 sets out the elements of the methodology to be used in arriving a decision as to whether it is appropriate to provide a figure or not. It is of interest to note that meeting the housing needs of a community is not included.

10.Meeting local housing needs is in many cases a key reason why a neighbourhood plan is undertaken by a community. The proposed methodology should reflect that and include consideration of local housing issues including: affordability, composition of the existing housing stock and relevant recent planning history regarding the provision of affordable housing.

11.The approach TVBC proposes in paragraph 3.89 appears to be a technical exercise which does include any consideration of local community support for development as expressed through the preparation of a neighbourhood plan. The methodology should, in its consideration of the scale of the housing requirement, take account of the involvement and support of the local community. This would be consistent with the approach set out in Policy HOU2.

Conclusion

12.The approach to neighbourhood planning and the setting of a housing requirement, as set out in paragraphs 3.80-3.91, does not place the community at the centre of that process. It and the methodology outlined in paragraph 3.89 should be revised to include: local housing issues, affordability, characteristics of the local housing stock, including availability of affordable housing and community engagement and support. The timing of the decision on the housing requirement should not be when an area is designated or the start of the review of a made plan.

Policy HOU2 Community Led Development

13.This policy will replace Policy COM9 of the current local plan. The intention of the policy is to enable communities to bring forward development outside of the local plan or neighbourhood plan process.

14.Under Policy COM9, and the predecessor Policy ESN06, TVBC have given permission for a small number of schemes. There does not appear to be any published analysis of why so few schemes have come forward and what the issues are which may be discouraging communities from developing schemes.

15.The new policy is considered to be more onerous and would make it more challenging for a community to bring forward schemes. This is surprising given the context of TVBC's stated aim to support local communities determine the scale of development in their area.

16. Policy HOU2a) requires any proposal to meet all three sustainability objectives of the NPPF. This may be difficult if the scheme only comprised housing and did not include any employment.

17. Policy HOU2b) requires the community benefit to be in addition to any section 106 obligations and CIL. No guidance is provided as to the scale of the additional benefit necessary to meet the criteria.

18. Policy HOU2e) requires any scheme for housing to be predominantly for affordable housing which meets the housing need of the parish. Policy HOU2f) requires justification for any open market housing in terms of the local housing market. Taken together these criteria mean that the policy is little different from the rural affordable exceptional housing policy and it is therefore not clear what the purpose of this policy is.

19. In the context of criteria e) it is difficult to see how a scheme would be able to meet criteria b) and deliver a viable scheme which would encourage a willing landowner to engage in the process. The policy does not appear to have been tested in the Whole Plan Viability Study January 2024.

20. Under the current Policy COM9 there is flexibility in who leads the development of a scheme, the parish council or an organisation working in partnership with it. The text supporting the new policy requires parish councils to take the lead and only in exceptional circumstances can third parties such as a landowner or developer take the lead. Given the resources needed to satisfy the criteria of the new policy including the commissioning of specific studies it would require a significant commitment from a parish council. The requirement for the majority of any housing to be affordable and the need for additional community benefits could severely limit the interest of a landowner, developer or community land trust. Most of the schemes which have been permitted under Policy COM9 and ESN06 have been developer/landowner led with support from the parish council.

21. A key feature of Policy COM9 was the involvement of the community in the development of a scheme and evidence of support for it. The supporting text in the adopted local plan was written to provide for flexibility when assessing an application. A review of schemes permitted under Policy COM9 shows that TVBC officers and councillors have taken such an approach when recommending permission. The proposed policy could result in few if any schemes coming forward.

Conclusion

22. Policy HOU2 as drafted would replace existing Policy COM9 with a more restrictive planning framework requiring a parish council to commit to a project which would be demanding in both time and resources to deliver a scheme. The policy should be re-drafted with the benefit of an analysis of schemes previously permitted and in consultation with key organisations including parish councils.

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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 reference number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent directly to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.