

Test Valley Borough Council

Test Valley Local Plan 2040 Regulation 18 Stage 2 Consultation

Representations on behalf of the Ashfield Partnership

28 March 2024

Introduction

CarneySweeney acts for the Ashfield Partnership (the Partnership), in connection with the site at Whitenap, Romsey. The Partnership comprises the Ashfield Estate as landowner and three developers: C G Fry and Son Ltd, Morrish Homes, and Wyatt Homes.

CarneySweeney submits the following representations on behalf of the Partnership to Test Valley Borough Council's current consultation on the Draft Test Valley Local Plan 2040 which closes at 12 noon on Tuesday 2nd April 2024.

Where specific amendments are being sought, these will be presented in red text with deleted text shown as ~~striketrough~~ and new text shown as underscore.

This representation is primarily made in the context of the Whitenap development.

Chapter 1: Introduction

The Partnership has no comment on this section.

Chapter 2: Vision, Key Challenges and Objectives

The Partnership supports the Vision and Objectives and Challenges for:

- Climate Change
- Our Communities
- Town Centres
- Built, Historic and Natural Environment
- Ecology and Biodiversity
- Health, Wellbeing, Culture, Leisure and Recreation
- Design
- Housing
- Economy, Employment and Skills
- Transport and Movement.

Chapter 3: Spatial Strategies

Paragraph/ Page Number	Policy or Text	Comments	Recommended Changes
Page 38	Spatial Strategy Policy 1 (SS1): Settlement Hierarchy	<p>The Partnership welcome the recognition that housing is key to sustainable development and healthy communities.</p> <p>The Partnership is also fully supportive of Romsey and Andover being listed at the top of the hierarchy.</p> <p>The only observation the Partnership would make relates to the final column of the uses table. It is not clear if development types not listed (i.e. retail, community uses, leisure etc) would not be supported. There is also no obvious difference between Tier 1 and 2 uses so the Council may wish to review how this table is presented.</p>	No changes recommended.
Page 45	Spatial Strategy Policy 3 (SS3): Housing Requirement	The Partnership is encouraged to see Whitenap included within the housing delivery and is in full support of this.	No changes recommended.
Page 47	Spatial Strategy Policy 4 (SS4)	The Partnership is encouraged to see Whitenap included within the housing delivery and is in full support of this.	No changes recommended.

Paragraph 3.128	Monitoring and Contingency	The Partnership advocates the importance of closely monitoring delivery of the Local Plan and actively promotes positive working relationships to ensure that schemes do not become stalled.	No changes recommended.
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Chapter 4: Test Valley Communities

Paragraph/ Page Number	Policy or Text	Comments	Recommended Changes
4.129	Romsey is the largest sustainable settlement with good connectivity to the wider highway network via the A27 and A3057, M271, M27 and M3.	Romsey is a highly sustainable settlement. The Partnership is encouraged to see that this has recognised by the Council and is in full support of this.	No changes recommended.
4.131	Romsey is a sustainable market town that has been the focus for development, with recent developments taking place at Ganger Farm and Abbotswood. Residential development is also underway at North Baddesley at Hoe Lane, and at Rownhams, at Broadleaf Park. There is one outstanding Adopted Local Plan 2016 allocation at Romsey, which is Whitenap. There is an outline planning application for Whitenap, currently under determination.	The Partnership is fully committed to delivering both Hoe Lane and Whitenap.	No changes recommended.

4.145	Outlines development and design objectives for Romsey Town Centre	The Partnership fully supports the aspirations of the Council.	No changes recommended.
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Chapter 5: Theme Based Policies

Paragraph or Page Number	Policy or Text	Comments	Recommended Changes
Page 131	Policy CL1: Countering Climate Change	The Partnership supports the policy and welcomes the flexible approach that the emerging policy takes.	No changes recommended.
Page 134	Policy CL2: Flood Risk	The Partnership supports the policy and welcomes the flexible wording regarding the required watercourse buffers.	No changes recommended.
Page 137	Policy CL3: Sustainable Buildings and Energy Use	<p>While the Partnership support the initiative to promote sustainability and energy efficiency, local policies should not seek to replicate or impose higher standards than those set out in current or emerging Building Regulations.</p> <p><u>Energy Hierarchy</u> – No mandatory standard proposed so no specific comments.</p> <p><u>Opportunities to reduce embodied carbon</u> – No mandatory standard proposed so no specific comments.</p>	<p>All proposals should embed the energy hierarchy within the design of buildings by prioritising fabric first, orientation and landscaping in order to minimise energy demand for heating, lighting and cooling.</p> <p>All development should take opportunities to reduce the development’s embodied carbon content, through the careful choice, use and sourcing of materials.</p> <p>All development will also need to be designed to avoid risks of overheating both now and in the future.</p>

		<p><u>Overheating</u> - This is addressed by Part O of the building regulations and so is not required.</p> <p><u>Energy use standards</u> - The Written Ministerial Statement (WMS) dated 13 December 2023 specifically states that the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations. Further the WMS identifies that the proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. As currently drafted Policy CL3 would impose rigid and stringent requirements on sustainable buildings and energy use without considering technical practicability or viability. Achieving the standards identified would require substantial initial investment due to the incorporation of advanced energy-efficient technologies and materials. This can significantly raise the cost of construction, which in turn will affect scheme viability. Mandating specific space and energy standards for all new homes may also limit the diversity and flexibility of housing options available to residents. Not all households may prioritize achieving net zero energy status or require the same spatial configurations. The requirement to offset energy use by provision of equivalent renewables, particularly PV, is also a very challenging target. This will require a large amount of PV, with all of the cost and visual implications that go with this,</p>	<p><u>New Homes</u> All new homes (including replacement dwellings) will need to be able to demonstrate net-zero operational carbon on site by ensuring achieving:</p> <ul style="list-style-type: none"> i. The predicted space heating demand of the homes will be less than 15 kWh/ m2/year; ii. The total kWh/yr of energy consumption of the buildings will be less than 35 kWh/m2/year; iii. The resultant total kWh/yr of energy consumption of the buildings on the site is balanced by the total kWh/yr of energy generation by renewables; and iv. Delivery in compliance with the submitted details. <p>Additionally, developments incorporating 150 or more dwellings should be accompanied by a whole life carbon assessment, which indicates how both operational and embodied emissions have been reduced. Delivery in compliance with the submitted assessment will be secured.</p> <p>New Non-Residential Development All new non-residential development of 500sqm or more should, be designed to meet the BREAAAM 'Excellent' standard and</p>
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		<p>but on plots where orientation is less than ideal it is likely not to be achievable. e.g. terraces of smaller houses orientated north / south, with their limited solar gain opportunities and limited roof space may not be able to generate the required energy levels. The Partnership therefore consider this part of the policy should be deleted.</p> <p><u>Whole Life Carbon (WLC) Assessment</u> – The Partnership strongly object to this requirement on the following grounds:</p> <ol style="list-style-type: none"> 1. While it is likely that WLC calculations will form part of the design of future housing developments, it is not currently possible to carry out a meaningful or accurate WLC calculation for a residential development. Not least because the UK Net Zero Building Standard has not yet been published - this document will effectively define the rules for carrying out WLC calculations. It is due to be published in 2024, but the ability to provide a WLC will depend on the content of the document, which is currently unknown. 2. A further major issue is that a WLC calculation would require a detailed energy use analysis for each dwelling which goes well beyond Building Regulations Part L compliance requirements – Part L currently measures only “regulated” energy use. While there are methodologies for evaluating operational energy use at the design stage such as PHPP, 	<p>delivery in compliance with the submitted details is secured.</p> <p>Additionally, non-residential developments incorporating at least 5000sqm of additional floorspace should be accompanied by a whole life carbon assessment, which indicates how both operational and embodied emissions have been reduced. Delivery in compliance with the submitted assessment will be secured.</p> <p>In order to achieve the <u>criteria objectives</u> of this policy, all new developments should seek to demonstrate the lowest level of carbon emissions in line with the requirements unless there are exceptional clear and compelling reasons that have been established through the design process that demonstrate that achieving these standards <u>is not technically or financially practicable or</u> produces a development that would be harmful to its setting or the character of the wider area.</p>
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		<p>SAP is the Government approved software for calculating carbon emissions which developers are legally obliged to use, and this is unable to generate the operational carbon figures needed for a WLC calculation.</p> <ol style="list-style-type: none">3. While not currently required by Building Regulations, it is possible to carry out embodied carbon calculations. These calculations are also in their infancy as the vast majority of product manufacturers do not yet have embodied carbon data available for their products, so any results therefore have to be treated as approximate, at best.4. There is also a significant assessment cost and time delay attached to an embodied carbon calculation, which would increase significantly if a whole life carbon assessment is required.5. Due to (3) above, simply combining operational carbon figures embodied carbon figures with the result of any embodied carbon calculations will not produce a whole life carbon figure.6. If the above issues can be resolved, and following publication of the UK Net Zero Building Standard, then various organisations who have been investigating methods of calculating WLC, such as RICS, will be able to progress with developing databases and software to enable WLC calculations to be carried out. The timescale for the availability of the required software and databases is currently unknown.	
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		<u>BREEAM Excellent</u> – No specific concerns with the standard but there should be greater flexibility in the policy through the amendments requested to the final paragraph.	
Page 140	Policy CL4: Water Use and Management	<p><u>Criteria a</u> - The Building Regulations Part G sets out in Table 2.1 the ‘maximum fittings consumption’ based on 125 litres/person/day, and in Table 2.2 the ‘maximum fittings consumption optional requirement level’ to achieve 110 litres per person per day. The requirement set by Policy CL4 goes a step beyond the levels set within Part G and would therefore require completion of Appendix A in Part G ‘water efficiency calculator’ to establish a specification that can achieve the performance standard. This would need to be applied for every house type across a site to demonstrate compliance.</p> <p>The National Framework (EA, 2020a) recommends reducing customers individual daily use to 110 litres per head per day by 2050. It is noted that within Southern Water’s current (2019) ‘Water Resources Management Plan’, they have set a ‘Target 100’ campaign which seeks to bring water usage down to 100 litres per head per day by 2040. However, the 2024 draft Plan (currently in consultation), confirms that since Covid-19 the estimated daily use per person has increased due to home working, and the current usage estimate has increased from 122.6 l/h/day to 135.6 l/h/day.</p>	<p>Development should be designed to meet a higher level of water efficiency. In order to achieve this:</p> <p>a) All new homes (including replacement dwellings) are designed and built to achieve a water consumption standard of no more than 100 litres per person per day <u>110 litres per person per day</u>; and</p> <p>b) All new non-residential developments of 500sqm or more are designed and built to achieve at least one credit through the BREEAM criterion for water consumption (reference Wat 01). This needs to be satisfied unless it can be demonstrated that it is not technically feasible <u>practicable</u> or financially viable.</p> <p>Additionally, development will be permitted provided that:</p> <p>c) It does not result in the deterioration of and, where possible, assists in improving water quality and be planned to support</p>

		<p>Through the consultation period they are therefore now considering whether the 100 litre target should remain, or whether this should be uplifted to 109 litres.</p> <p>The Partnership submit that the approach in the Local Plan should be aligned to the design standard with the Southern Water 'Water Management Plan', which looks likely to increase the target to 109 l/h/day, or alternatively align it with the National Framework target of 110 l/h/day, which also aligns with the higher standard set within Building Regulations Part G.</p> <p>The remainder of the policy is supported and the Partnership welcome that there is flexibility based on technical or financial viability. The only concern is the reference to 'feasibility' which is an unrealistic bar to set as it does not take account of all relevant factors.</p>	<p>the attainment of the requirements of the Water Framework Directive Regulations;</p> <p>d) It does not result in a risk to the yield and quality of groundwater within a principal aquifer, including groundwater source protection zones, and there is no risk to water supplies; and Prior to occupation, adequate water supply, surface water drainage, wastewater infrastructure and waste water treatment capacity is available, or can be made available, and connected to the nearest point of adequate capacity, to serve the development so as to avoid risks of adverse effects on the water environment.</p>
Page 149	Policy COM1 – Delivering Infrastructure	The Partnership support the aspirations of the Council.	No changes recommended
Page 173	Policy ENV7: Amenity	<p>The Partnership would be concerned about the mandatory application of part c (communal open space or balconies) to flats as this could reduce density and viability.</p> <p>Flexibility is needed in the wording of the policy as such provision may not always be appropriate or required. For example, where balconies could</p>	<p>Development will be permitted provided that:</p> <p>a) It provides for the privacy and amenity of its occupants and those of neighbouring properties;</p>

		result in unacceptable overlooking or where properties are in close proximity to existing or proposed Public Open Space.	<p>b) It does not reduce the levels of daylight and sunlight reaching new and existing dwellings or private open space to below acceptable levels; and</p> <p>c) In the case of residential dwellings, it provides for private open space in the form of private gardens, balconies or communal open space which are appropriate for the needs of residents <u>unless such provision would result in unacceptable amenity impacts or public open space is available to meet the needs of the development.</u></p>
Page 177	Policy BIO3: Biodiversity Net Gain	Policy BIO3 deals with BNG, but Planning Practice Guidance confirms that plan makers do not need to include policies that duplicate the legislation. The Partnership therefore considers that this policy should be omitted as it is not necessary.	<p>DELETE in its entirety.</p> <p>Development for one or more dwelling or non-residential buildings will be permitted provided that it is designed to deliver at least a 10% measurable net gain of biodiversity habitat units using the appropriate BNG Metric. This will be secured and maintained for a minimum of 30 years. In designing the development to achieve the measurable net gain, the following principles will need to be adhered to:</p> <ul style="list-style-type: none"> i. Apply the mitigation hierarchy; ii. Avoid losing biodiversity that cannot be offset elsewhere, such as irreplaceable habitats;

			<p>iii. Focus on achieving the best outcome for biodiversity; and</p> <p>iv. Where possible, maximise wider sustainability benefits.</p>
Page 188	Policy HE1: Open space and recreation	The Partnership requests additional wording is added to allow flexibility of provision to suit site circumstances.	<p>Proposals for major residential development will be permitted provided that:</p> <ul style="list-style-type: none"> a) the provision of open space is to a standard of at least 3 hectares per 1,000 population comprising a minimum of: <ul style="list-style-type: none"> • 0.4 hectares of parks and gardens • 0.8 hectares of informal open space • 0.6 hectares of provision for children and teenagers • 0.2 hectares of allotments • 1 hectare of outdoor sports facilities and/ or equivalent indoor sports facilities b) the lay out and equipment provided is to a recognised specification at an early stage in the development; and c) arrangements for the long term management and maintenance for the open space, equipment or facility having been made and secured.

			<p>This requirement relates to the net area of usable open space which does not include associated infrastructure such as access points, pedestrian or cycle paths, parking, ancillary buildings, landscaping and safety margins.</p> <p><u>The appropriate of on-site provision of all the identified typologies will be assessed against site specific circumstances.</u></p> <p><u>Offsite contributions for open space will be secured if onsite provision is not delivered as part of a development.</u></p>
Page 194	Policy DES1: Delivery of Sustainable and High-Quality Design	<p>The Partnership questions the need for this policy and considers that a combination of Policy DES1 and DES2 would more efficient.</p> <p>If the Council consider that this policy should remain, then the Partnership seeks additional flexibility be built into this policy to allow for an alternative approach to be agreed.</p>	<p>Delete in its entirety.</p> <p>Or</p> <p>Amend as follows:</p> <p>All development will <u>should</u> achieve high quality design which will conserve and enrich the character and identity of the Borough's towns, villages and landscape.</p> <p>To achieve this;</p> <p>A. Development will-should <u>positively</u> reflect the ten characteristics of well designed places, as set out in the National</p>

			<p>Design Guide (and any successor) and will be designed through a sound contextual analysis and understanding of the site and its surroundings, including any opportunities and constraints;</p> <p>B. Development will <u>should</u> maintain or enhance the sense of place and distinctive character of the locality, through taking account of the individuality of the Borough's settlements, landscapes, buildings, ecology, topography, history and heritage assets;</p> <p>C. Development will <u>should</u> contribute positively to, and not detract from, the distinctive character of the immediate and wider landscape;</p> <p>D. Development will <u>should</u> take opportunities, wherever possible, to improve the public realm and to minimise opportunities for disorder and crime; E. Development will be designed to be resilient to the changing climate by adopting sustainable design practices;</p> <p>F. High quality green and blue infrastructure will <u>should</u> be provided with new development, designed with resilient hard and soft landscaping, and integrating biodiversity enhancements;</p>
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			<p>G. The layout of new developments will <u>should</u> be permeable and legible allowing for suitable access and movement for all users. Development will be designed to prioritise sustainable and active travel. Where cycle and car parking infrastructure, utilities and services are required, they will be provided in appropriate and convenient locations for the users and designed to integrate positively;</p> <p>H. Major development will <u>should</u> need to take account of, and respond positively to, relevant local and national design guidance and codes. Applicants will be expected to produce a masterplan, design code or design and access statement as part of the planning application depending on the nature and scale of development.</p>
Page 197	Policy DES2: Design Details and Considerations	The Partnership seeks additional flexibility be built into this policy to allow for an alternative approach to be agreed.	<p>Development will be permitted where it is demonstrated that:</p> <p>a) the design, layout, scale, massing, grain, density, height, appearance, materials, finishes and detailing of any proposed new development will <u>should</u> be of high quality, distinctive and sensitive to the site and context;</p>

			<p>b) the design incorporates good quality hard and soft landscaping, including boundary treatment, planting, surfacing, amenity space and trees (where these can be accommodated) that is sensitive to the landscape setting, views and local character. Local heritage and nature will <u>should</u> be incorporated positively within the development, where appropriate;</p> <p>c) the design <u>should</u> responds positively to the character, setting and topography of the site, utilising sunlight and shadow to maximise and make efficient use of natural daylight, ventilation, orientation, solar gain, sustainable drainage opportunities and space;</p> <p>d) Sufficient, well located and accessible space is provided for the storage of refuse and recycling;</p> <p>For applications that include shopfronts, advertisements and/or new signage:</p> <p>e) Any proposed signage and/or advertisements will <u>should</u> be sensitively designed and sited for their purpose, with clear regard to local amenity, the historic environment, public safety, the historic environment, place and context.</p>
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			Development will not be permitted if it is of poor design and where it fails to improve the character, function, appearance and quality of the area.
Page 212	Policy HOU5: Provision of Housing to Meet Our Needs	The Partnership recognises this is an important consideration but would request flexibility to allow for market conditions and viability to be taken into account.	<p>Residential development will be permitted provided that it delivers a range of accommodation which reflects local needs, for both market and affordable housing <u>subject to market and viability considerations</u>, including suitable provision for:</p> <p>a) a mix of homes by: size (including number of bedrooms), type and tenure, which take account of the composition of the current housing stock, reflects the needs of newly forming households and local evidence; and</p> <p>b) an appropriate form and density of development which makes efficient use of land; and For major development, provision for specific housing needs, including older people and those who require specialist housing, should be considered.</p> <p>This will need to take account of the location and accessibility of the site as relevant to the type of household occupiers.</p>

<p>Page 213</p>	<p>Policy HOU6: Residential Space Standards</p>	<p><u>NDSS</u>– The Planning Practice Guidance states that when introducing NDSS there is a need to consider need, impact on viability, and transitional arrangements. While need and viability are cross referenced to other evidence documents there is no mention of transitional arrangements so it is unclear if the NDSS would apply to future reserved matters applications. The Partnership would request this be reviewed and confirmed as this could have significant implications for density and delivery of any future detailed consents.</p> <p><u>M4 (2) and (3)</u> – The Planning Practice Guidance is silent on whether transitional arrangements are required for M4 standards so again it is unclear if this would apply to future reserved matters applications on the Whitenap site. The Partnership does have reservations about mandatory M4(3) requirements due to viability and delivery implications. While NDSS can generally comply with M4 (2), only larger floor plans can comply with M4 (3)A, so in addition to NDSS causing an increase in average plan sizes, the 10% requirement for M4-3 compliant houses will further increase the number of larger houses provided. M4(3)B poses even greater challenges to achieve as it requires the provision single storey properties which will have additional viability and density implications. The Partnership would need to be clear that the evidence supports such a</p>	<p>All new residential homes (including conversions) will be provided to Part M4(2) standard (accessibility) and Nationally Described Space Standards (NDSS) (size) or the Building Control space standard relevant at the time of determining the application <u>where there is clear and demonstrable evidence confirming a need in the local area and that such provision will not harm the viability of the development or reduce development quantum and densities.</u></p> <p>The Council will negotiate on major residential sites, for the provision of 10% of market housing to be competed to Part M4(3)A adaptable homes standard and 10% of affordable/social rented housing to be completed to Part M4(3) B accessible homes standard (or Government equivalent), where there is a demonstrable need in the local area. <u>where there is clear and demonstrable evidence confirming a need in the local area and that such provision will not harm the viability of the development or reduce development quantum and densities.</u></p> <p>This requirement shall be provided across both open market and affordable housing.</p>
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		policy. The Partnership would also want to see a greater degree of flexibility introduced to the policy.	
Page 124	Policy HOU7: Self-Build and Custom Build Housing	<p>The Partnership would seek confirmation that this would not be applied to future reserved matters applications (having not been secured in the requisite outline Section 106).</p> <p>If this is the case the Partnership would have no objections to the policy.</p> <p>However, if this would be applied to future detailed schemes the Partnership would have strong reservations about how such plots would be delivered in line with the outline parameters and principles.</p>	No change recommended (subject to confirmation of the transitional arrangements).
Page 233	Policy TR1: Active and Sustainable Travel	The Partnership cannot comment on this policy without being clear what the standards will be. The Partnership would issue a holding objection to this policy pending receipt of the proposed standards.	Holding objection.
Page 236	Policy TR3: Parking	The Partnership cannot comment on this policy without being clear what the standards will be. The Partnership would issue a holding objection to this policy pending receipt of the proposed standards.	Holding objection

Draft Policy Map

The Partnership are fully supportive of Whitenap being shown to be included with the settlement boundary for Romsey.

Conclusions

We ask to be kept informed of next stages of consultation and also that we have the opportunity to participate in any public examination of this document.

In the meantime, should you have any queries please do not hesitate to contact us.
