

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*	Jacob
Surname*	Goodenough		
Organisation* (If responding on behalf of an organisation)	Nova Planning 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:

On behalf of Mr. C. Grimsdale

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
<p>Please see enclosed representations, which refer to policies SS1, SS2 and HOU7. A brief summary is provided below.</p>

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
SS1 Settlement Hierarchy	Kimpton should be grouped as a rural cluster along with Thruxton and Fyfield. These should be designated as Tier 3 settlements and should contain a settlement boundary.
SS2 Development in the Countryside	This policy is considered overly restrictive when applied to Kimpton. Kimpton should be grouped as a rural cluster.
HOU7 Self Build and Custom Build Housing	This policy should be amended to better address the site location and type requirements of those seeking self and custom build plots.

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.

Test Valley Borough Council
Draft Local Plan 2040
Regulation 18 Stage 2 (2024)

Written representations prepared on behalf of Mr. C. Grimsdale
March 2024

1. Introduction

- 1.1 These written representations have been prepared by Nova Planning Limited on behalf of Mr. C. Grimsdale in response to the Test Valley Borough Council (TVBC) Local Plan Draft for Regulation 18 Part 2 Consultation (Draft Local Plan/DLP). The comments set out in these representations relate to the publication of the Draft Local Plan and its supporting evidence base.
- 1.2 Nova Planning Ltd is supporting the promotion of land west of Deacon Road, Kimpton, as shown in Figure 1 below and have previously made representations as part of the Regulation 18 Stage 1 consultation. The Site is located in the northern part of Kimpton and is directly adjacent to the existing settlement boundary on three sides. Development of the Site would achieve a logical rounding of the northern extent of Kimpton and provide the opportunity to deliver approximately 5 - 10 dwellings, providing a pattern of development and density consistent and proportionate with the existing settlement.

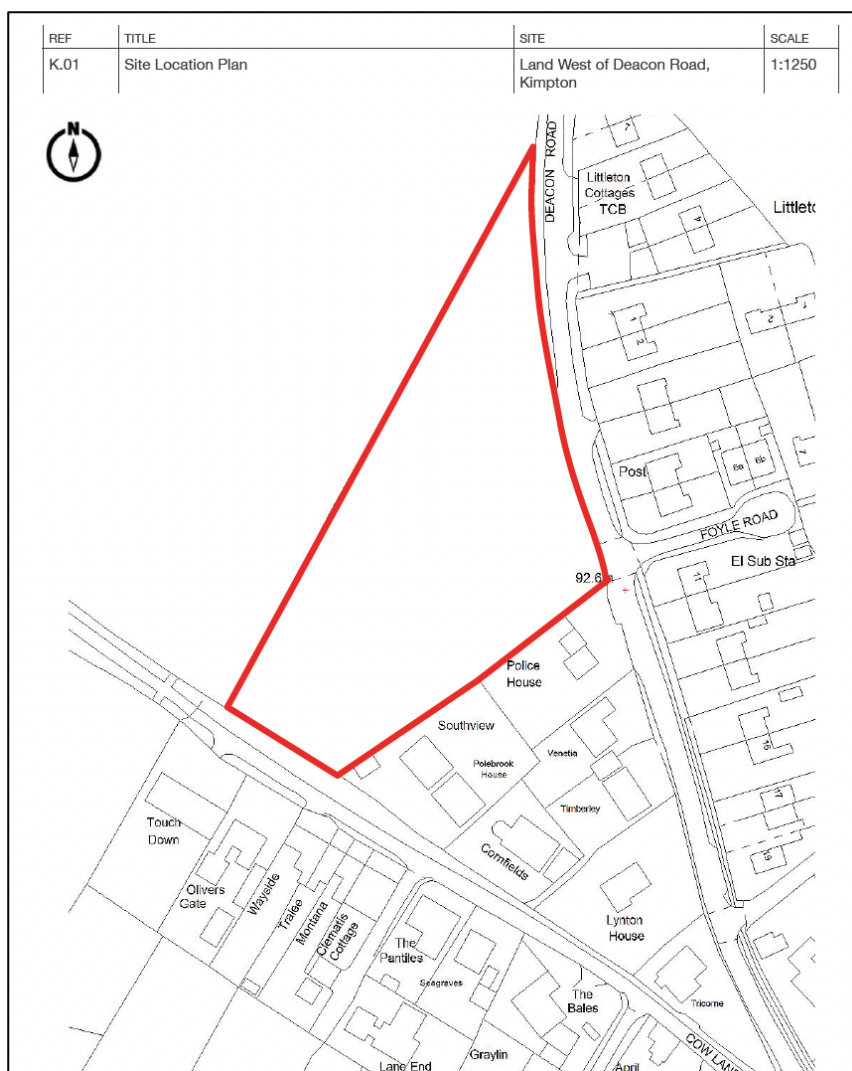


Figure 1 – Site Location Plan

2. Chapter 3: Spatial Strategy

2.1 The Spatial Strategy Topic Paper sets out the steps taken so far to refine the Spatial Strategy and concludes that,

- Growth will be directed primarily to the main settlements,
- There is no compelling reason to direct larger strategic scale housing to the rural area and instead,
- Smaller scale growth in accordance with the settlement hierarchy is appropriate to sustain local communities.

2.2 The proposed spatial strategy is set out at Paragraphs 3.12 to 3.18 of the DLP. In particular, paragraph 3.14 recognises that a wider distribution of development than that set out in the Local Plan 2016 is required to support and sustain vibrant and healthy communities. This approach is supported and we welcome the recognition that an appropriate level of development is required in rural areas to sustain rural communities.

Policy SS1: Settlement Hierarchy

2.3 Policy SS1 sets out the approach for delivering the spatial strategy, through the settlement hierarchy. A Settlement Hierarchy Topic Paper has been prepared which identifies and groups together towns and villages based on their sustainability and their role and function. We support the recognition given to smaller settlements in providing development which may help support services in a settlement nearby (paragraph 3.21).

2.4 Paragraph 3.38 and Table 6 of the Settlement Hierarchy Topic Paper identify the settlements which benefit from and have access to services and facilities within a nearby settlement. We object to the exclusion of Kimpton from a grouping in Table 6. The Kimpton, Thruxton and Fyfield C of E Primary School is located within Kimpton Parish, is incorrectly excluded from Table 7 of the Settlement hierarchy Topic Paper. This is a key shared facility which brings Kimpton, Fyfield and Thruxton into one school community, as well as being located directly adjacent to a large recreational ground which is also serves all three settlements, as well as individual playgrounds/village greens within each parish.

2.5 Therefore, it is proposed that Kimpton, Fyfield and Thruxton should be assessed as a further grouping in Table 6 as follows:

Villages	Shared Facilities					Comments
	Shop	PH	Primary School	Sports Facility	Hall	
Kimpton, Fyfield and Thruxton	No	Yes	Yes	Yes	Yes	<p>The Kimpton, Thruxton and Fyfield C of E Primary School is located centrally and serves all three settlements.</p> <p>The recreational ground with sports pitches is directly adjacent and is therefore considered to serve all three settlements.</p> <p>Bright Futures operate a children's nursery from Kimpton Village Hall.</p> <p>There are also pubs, village halls and churches located across the three settlements which are available to all residents. The settlements are close to Andover and neighbouring villages which offer a range of convenience shopping and groceries (e.g. Rosebourne Food Hall).</p>

2.6 To ensure consistency with the methodology applied at Table 6 of the Settlement Hierarchy Topic Paper, it is proposed that Kimpton, Fyfield and Thruxton are grouped together as a “Rural Cluster” and that the settlements are collectively designated as Tier 3 settlements. This will help sustain this group of settlements so that residents can benefit from and support the shared services and facilities offered across the group. Paragraph 83 of the NPPF supports this approach and confirms that policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby. This is particularly true of the shared Primary School.

2.7 Kimpton is classed as a Rural Village in the adopted local plan and has a settlement boundary, meaning that the principle of development and redevelopment is permitted provided it is appropriate to other local plan policies. We object to the removal of the settlement boundary for Kimpton as set out in paragraph 3.43 of the DLP as this will remove the presumption in favour of development and redevelopment within the boundary. As demonstrated above, Kimpton plays an important role in sustaining the Kimpton, Thruxton and Fyfield C of E Primary School. It's designation as a Tier 4 settlement without a settlement boundary does not provide an appropriate policy basis to sustain Kimpton and support local services, particularly the primary school, public houses and other community facilities.

2.8 Instead, it is proposed that Kimpton is grouped together with Fyfield and Thruxton and included in Tier 3 of the Settlement Hierarchy as a “Rural Cluster”. Settlement boundaries should be drawn around each

in line with other Tier 3 settlements, including those which are part of a cluster. This would allow an appropriate level of development, ensuring that settlements grow organically and proportionally, while supporting key services within the cluster. This acknowledges that while small villages may not perform particularly well when considered in isolation, groups of smaller villages that have a geographic and functional relationships do perform better when considered together, as is the case here.

Policy SS2: Development in the Countryside

- 2.9 As currently drafted, we object to Policy SS2 as it would overly restrict development in “Other Settlements” outside Tiers 1 – 3 and settlements without a settlement boundary. However, this could be overcome through the introduction of “Rural Clusters” and the designation of settlements within a cluster as Tier 3 settlements, helping to support shared services and facilities.

3. Chapter 5: Theme Based Policies

Policy HOU7: Self Build and Custom Build Housing

- 3.1 The inclusion of a dedicated policy for self-build homes at Policy HOU7 is noted. However, by its nature self-build housing is bespoke and often highly location specific. Requiring a proportion of serviced plots on larger sites is too blunt an approach to effectively respond to the Borough's need and location requirements of self-builders. Policies should encourage developers to offer a proportion of serviced plots on all sites, but it should not be made obligatory. As worded, we object to the requirements of this policy.
- 3.2 The Borough's self-build need is derived from the number of people and groups on the Council's register. This register is dynamic and will vary over time. It may be that at a certain point in time there is no demonstrable need for serviced plots, but if a policy sets a mandatory proportion of serviced plots, then the developer would be obliged to provide these regardless of the fact that they would be surplus to requirements. In addition, even if there were a demonstrable need, the need may not be in the location of the development, which would result in a situation where the plots are made available but not taken up by self-builders. The Council states that on average 34 people have requested to be added to the self-build register each year since 2016 and that this provides an indication of future needs. However, there is no suggestion that this has been revisited. The Council will need to ensure that their evidence is robust and reflects the on-going demand for self-build and custom-build plots.
- 3.3 Paragraph 10.28 of the Test Valley Authority Monitoring Report 1 April 2022 to 31 March 2023 notes that the preferences of those on the register are as follows:
- Generally plots of 0.25+ acres are being sought;
 - Plots are sought for individual, predominantly detached dwellings
 - Plots are generally sought within semi-rural or rural areas, within relatively close proximity to Romsey or Andover, or other villages within the Borough.
- 3.4 A significant number of those on the list are seeking a plot in a rural area or village location, which is not uncommon. Many people looking to build their own home will not want to do so on a large residential development. As such, there need to be other ways in which to meet demand for self-build plots other than on large sites. A bespoke policy would be more responsive to the Borough's self-build need and better placed to address the plot requirements set out above – rather than simply portioning off a part of a larger site for self-build homes. One approach would be a policy which enables development on small sites adjacent to settlements where they would support self or custom build housing to come forward, particularly where this would round off the developed form.

- 3.5 Alternatively, self-build housing could be included as an option under draft Policy HOU2 Community Led Development or through amendments to Policy HOU7 to enable individual proposals to come forward on suitable sites outside of larger developments.
- 3.6 In addition, it is considered that self and custom build development should be added to the table at Policy SS1 under 'Scale of Development' for all tiers. This would ensure a presumption in favour of self and custom build homes within the settlement boundary and provide a range of locations where the principle is acceptable – again helping to meet the varied locational requirements set out in the AMR.
- 3.7 Self-build housing should not be burdened with any additional sustainability requirements above non self-build housing.
- 3.8 Finally, it is considered that a marketing period of 24 months is excessive and unjustified, particularly as there is demand for self-build plots. A period of 12 months would be more appropriate.

4. Conclusion

- 4.1 In conclusion, it is considered that Kimpton has a physical and functional relationship with the settlements of Fyfield and Thruxton with shared common facilities, including notably the primary school and as such, they should be grouped as a Rural Cluster and designated as a Tier 3 settlement accordingly. This would be consistent with other smaller settlements which share facilities and services and rely on neighbouring communities to help them thrive.
- 4.2 The Draft Local Plan proposes that the Settlement Boundary around Kimpton is deleted. We object to this proposal and consider that the settlement boundary should be retained alongside the designation as a Tier 3 settlement.
- 4.3 The dedicated policy on self and custom build housing is not supported in its current form where it is considered to place an over-reliance on large sites to meet need. It is considered that this will not address the locational requirements of people looking to self-build their own home. A policy which enables small sites on the edge of settlements to come forward for self-build development is proposed and would be supported. It is also recommended that a presumption in favour of self-build housing within the Settlement Boundary would also be welcomed through an amendment to the Table at Policy SS1 across all tiers of settlements.