

2 April 2024

Planning Policy & Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

By email: planningpolicy@testvalley.gov.uk

Dear Sir/ Madam

DRAFT LOCAL PLAN 2040, REGULATION 18 (STAGE 2) CONSULTATION

I am pleased to write on behalf of Southern Strategic Land (SSL) in response to the Test Valley Borough Council (TVBC) Draft Local Plan 2040 Regulation 18 Stage 2 public consultation. SSL previously made representations (appended) as part of the Stage 1 consultation in 2022.

Palestine, Grateley Station and Grateley form a 'grouped settlement' in the draft Local Plan, which we will refer to as Grateley. By way of background SSL has a land interest in Grateley. For context, the subject land is very well related to the existing settlement and has been identified in the most recent Strategic Housing and Economic Land Availability Assessment (SHELAA 2023) as deliverable within 5 years with capacity for 40 dwellings, ref. 383 Three Acres.

Improvements to draft plan since Stage 1 consultation

We are pleased to see various improvements to the draft plan as a result of the previous consultation. The inclusion of Policy HOU7 that seeks to meet the demand for self and custom build housing is encouraging, although we query whether a sole reliance on large sites of 100 units is the most appropriate method through which to meet demand. There are known delivery issues for self and custom build dwellings as part of large schemes. It is broadly accepted that large schemes typically fail to provide adequate plot sizes, which regularly results in an ineffectual marketing period for plots and, ultimately, a reversion in their use to market housing. To appropriately meet the duty to provide adequate self and custom build plots as required under the Housing and Planning Act 2016, and most recently strengthened by provisions contained in the Levelling Up Act, we would encourage the additional inclusion of a self and custom build housing exception site policy, similar to that of Policy HOU4.

Of some encouragement we note that Grateley is now included as a Tier 3 settlement in the Settlement Hierarchy, where it was previously included as Tier 4. However, this is somewhat illusory given that the Tier 3 and Tier 4 categories from the previous Stage 1 draft plan have simply been merged. We reiterate the point that the level of public transport provision available at Grateley with its mainline train station, and its resultant role and function as a settlement, has not been given appropriate weight by TVBC when considering the appropriate location and scale of future development. This point is further made below specifically in relation to Policy SS5.

Spatial Strategy Policy 5 (SS5): Neighbourhood Development Plan Housing Requirements

We welcome the use of neighbourhood plans as a tool to deliver housing. However, we have concerns over the use of Policy SS5 to delegate responsibility for allocating housing sites to neighbourhood plans.

The neighbourhood planning process is inherently uncertain and neighbourhood planning groups are under no statutory obligation to allocate sites for housing within neighbourhood plans. In the case of Grateley in particular, it is notable that the neighbourhood plan area was designated in

July 2022 and in the 20+ months that have since passed there has been very little sign of progress. It is reported that there has been limited engagement from the neighbourhood plan steering group and no professional planning consultant has been identified to assist with its preparation in almost 2 years. In this context it does not seem appropriate to solely depend upon the Grateley Neighbourhood Plan to contribute towards the wider housing requirement, nor provide for the level of growth required to sustain Grateley. Whilst generally supportive of neighbourhood planning and very willing to engage with Grateley Parish Council on the matter, in the circumstances we would encourage TVBC to use the Local Plan process as the primary means through which to allocate appropriate housing for Grateley.

Notwithstanding the above, we consider that the methodology used to arrive at a minimum housing requirement for Grateley does not appropriately account for the sustainability benefits of the mainline railway station and, as a result, the role and function of Grateley as a settlement.

Paragraph 65 of the NPPF requires local planning authorities to set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations. We are aware that guidance does not indicate a specific approach or method for this. Paragraph 3.89 of the draft Local Plan states that TVBC's methodology takes account of various factors, however it is unclear exactly how TVBC have arrived at the minimum 10 unit housing requirement for the Grateley Neighbourhood Plan. The 10 unit minimum for Grateley mirrors that of Amport, Longstock and Nether Wallop; none of which benefit from exceptional public transport in the form of a mainline train station. We would politely direct you to our previous representation (appended) that outlines passenger records for Grateley station and explains why different facilities and, in particular, different levels of public transport provision should be weighted differently. These points are relevant in the context of determining the minimum housing requirement for the designated Grateley area.

Summary

We welcome the opportunity to comment on the Draft Local Plan 2040 as part of Regulation 18 Stage 2. For the reasons stated above, as part of the ongoing Local Plan preparation, at this stage SSL strongly encourages TVBC to:

1. Reconsider the appropriateness of delegating responsibility for allocating housing in Grateley to the Neighbourhood Plan, in light of its stalled progress;
2. Revisit the role and function of Grateley and its mainline train station in determining its appropriate minimum housing requirement;
3. Consider the inclusion of a self and custom build exception site policy in light of the known delivery issues that come with self and custom build as part of larger schemes.

Yours faithfully,

Ben Jones MRICS
Southern Strategic Land

APPENDIX – PREVIOUS REPRESENTATION MADE BY SSL IN APRIL 2022

7 April 2022

Planning Policy & Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

By email: planningpolicy@testvalley.gov.uk

Dear Sir/ Madam

DRAFT LOCAL PLAN 2040, REGULATION 18 (STAGE 1) CONSULTATION

I am pleased to write on behalf of Southern Strategic Land (SSL) in response to the Test Valley Borough Council (TVBC) Draft Local Plan 2040 Regulation 18 Stage 1 public consultation.

By way of background, SSL has a land interest in Grateley and we will welcome the opportunity to comment on specific Development Management policies later this year as part of the Regulation 18 Stage 2 consultation. For context, the subject land is very well related to the existing settlement and has been identified in the most recent Strategic Housing and Economic Land Availability Assessment (November 2021) as deliverable within 5 years with capacity for 40 dwellings, ref. 383 Three Acres. We are presently preparing baseline technical evidence for the planning promotion of a Custom Build development at Three Acres. For the purpose of this representation, however, our comments are limited to the broader strategic matters that the Draft Local Plan Stage 1 covers.

For ease, we present our specific comments to each draft policy or subject below.

Spatial Strategic Policy 1 (SPP1): Settlement Hierarchy

The Settlement Hierarchy Assessment background paper sets out how the Local Plan aims to create a simplified settlement hierarchy. We generally support the aim to provide a clear and simplified hierarchy to help implement the spatial strategy and influence the distribution of development throughout the Borough. However, it is our belief that the spatial strategy fails to recognise the sustainability of certain settlements, such as Grateley, which exhibit many of the facets of a higher tier settlement.

Palestine, Grateley Station and Grateley form a 'grouped settlement' in the Assessment paper, which we will refer to as Grateley. Grateley has been identified as a Tier 4 settlement, the lowest tier settlement other than Countryside. We are strongly of the opinion that the methodology that has been used to determine tier status in the settlement hierarchy is too crude, without appropriate weight afforded to the different types of facilities and in particular the level of public transport provision borne by a mainline train station.

We consider that the sustainability benefits of Grateley's railway station are not appropriately accounted for when one considers the speed and ease of the direct links it provides to employment centres and Tier 1 settlements within TVBC and beyond. Grateley station runs regular services throughout the day to Salisbury (13 minute journey time), Andover (7 minute journey time) and Basingstoke (29 minute journey time) as well as an hourly service to London Waterloo (80 minute journey time). We would suggest that the level of use should be considered in the assessment of public transport provision. This should be taken in the round when making the wider judgement on the sustainability of a settlement and its position in the spatial strategy. We do not believe this is presently the case.

For example, the methodology that informs the draft settlement hierarchy currently puts the level of public transport provision available at Grateley on an equal footing with East Tytherley, a small village that benefits from 3 daily buses to Salisbury. We contend that this is erroneous and objectively is not comparable. The point is further highlighted when considering the Office of Rail and Road station usage data. In 2019-20, Grateley station recorded 241,250 passenger entries and exits. By way of comparison, Mottisfont & Dunbridge station in southern Test Valley recorded 26,000 passenger entries and exits over the same period. Yet, Mottisfont & Dunbridge is afforded the same status in terms of its public transport provision, and ultimately in terms of its settlement hierarchy status, as Grateley.

We would further contend that the methodology should apply an appropriate weighting to the individual facilities offered. Presently, it groups them into six 'Key Facilities' and then 'Other Facilities', alongside a partial assessment of public transport (as discussed above). This should be further broken down to reflect the modern-day importance/ impact/ breadth of appeal of individual facilities. Grateley contains what we consider to be the two most important key facilities when considering sustainable development in the context of social capital: a primary school and a public house. Typically, one would rank these above a place of worship and a community hall, if based only on usage and breadth of appeal. Grateley coincidentally has both a community hall and place of worship, as well as a school and a public house. We would also contend that superfast broadband is now very important in the context of remote working and reducing the frequency of the commute, so much so that we would rank this among the key facilities and we would suggest that it should be attributed a stronger weighting in the sustainability assessment and settlement hierarchy. It is worth noting that Grateley benefits from superfast broadband.

We are strongly of the opinion that the methodology that has been used to determine tier status in the settlement hierarchy is presently too crude, without appropriate weight afforded to individual key facilities and, particularly, the benefits borne by exceptional public transport in the form of a mainline train station. In light of all of the above, there is a strong case to enhance Grateley's status in the settlement hierarchy and we would encourage TVBC to revisit this as preparation of the Local Plan moves forward.

Strategic Policy 2: Delivering Healthy, Well-Designed Development

We welcome the inclusion of this policy. Criteria A, B and C comprise important design and landscape-based principles. We view these as particularly important in TVBC given the identity and individuality of many of the Borough's settlements, including Grateley. Indeed, in many circumstances, these criteria will support the case for sensitive, low-density Custom Build developments in village-edge locations as an alternative to a typically more homogenous and intense form of residential development. Criteria G of Strategic Policy 2 relates to the need for development to be designed to prioritise sustainable and active travel. This goes directly to the point made above about SSP1. Grateley, with its railway station bisecting the settlement, does warrant a settlement status considerably higher than Tier 4, especially so in the context of Criteria G.

Sustainable Transport and Movement

Paragraphs 4.123 to 4.134 establish broad principles for encouraging sustainable alternatives to private car journeys. Importantly it is recognised that, being predominantly a rural Borough, "getting around by car is likely to be a necessity for many to access work, education, services and leisure facilities", and it goes on to state that "the spatial strategy will ensure development is located where access to services/ facilities to meet the daily needs of our rural population can be undertaken by sustainable modes". This further strengthens the case for Grateley to be elevated in the Settlement Hierarchy for the reasons already mentioned.

Strategic Policy 6: Housing Provision

We welcome the detail provided on Affordable Housing, First Homes and Rural Housing. It is encouraging that the Council is considering the inclusion of a policy on First Home Exception Sites and we would wholeheartedly encourage such a policy to be taken forward. It is somewhat surprising to read no mention of Custom Build or Self-Build (other than in the Glossary) given that

it is a key part of the Government's agenda to increase supply and tackle the housing crisis. We would encourage detailed policy on this as part of Stage 2. We would also welcome detail on how TVBC intends to meet its duty under the Housing and Planning Act 2016 to grant suitable development permission, in respect of serviced plots of land, to meet demand on its Self-Build and Custom Build register. Little information on TVBC's performance under the duty is provided in the TVBC Annual Monitoring Report, nor is the Self-Build register published for public viewing. We consider that TVBC should be including policies in the Local Plan 2040 to ensure that sufficient Self-Build and Custom housebuilding is planned for the Borough. In due course, we would be pleased to detail how our land interest in Grateley could help meet Custom Build demand in the Borough.

Summary

We welcome the opportunity to comment on the Draft Local Plan 2040 as part of Regulation 18 Stage 1. For the reasons stated above, as part of the ongoing Local Plan preparation, at this stage SSL strongly encourage TVBC to:

1. Reconsider the status of Grateley in the Settlement Hierarchy within SPP1, and;
2. Include detailed policies around Self-Build and Custom Build, which outline how TVBC plan to meet the established need.

Yours faithfully,

Ben Jones **MRICS**
Southern Strategic Land