

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)	Miss	First Name*	Alice
Surname*	Drew		
Organisation* (If responding on behalf of an organisation)	Southern Planning Practice Ltd		

Please provide your email address below:

Email Address*	
-------------------	--

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:

Mr Andrius Valiauga of IDAC Interiors 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
See submitted representations

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
	See submitted representations

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.

**Land at Lakelands,
Newtown Road, Newtown**

[Representations to Test
Valley Borough Council Local
Plan Regulation 18 Stage 2](#)

**Alice Drew BSc (Hons) MSc
MRTPI**



Client: Mr Andrius Valiauga

Date: March 2024

Ref: TV-699-4-AD

Southern Planning Practice Ltd

Registered Office:

[REDACTED]

Website: www.southernplanning.co.uk

Registered in England and Wales

[REDACTED]

<u>Contents:</u>	Page
1.0 INTRODUCTION	1
2.0 RESPONSE TO SPATIAL STRATEGY	2
3.0 RESPONSE TO HOUSING PROVISION.....	4
4.0 LAND AT LAKELANDS – THE OPPORTUNITY	6
5.0 CONCLUSION.....	8

1.0 [Introduction](#)

- 1.1 These representations have been prepared by Southern Planning Practice Ltd on behalf of Mr Andrius Valiauga of IDAC Interiors Ltd, who own the land at Lakelands in response to the current Test Valley Local Plan Regulation 18 Stage 2 Consultation. The site is considered to be suitable for new residential development in the plan period.
- 1.2 The land at Lakelands is a small site which would provide an immediate, important contribution to Test Valley Borough's housing need over the plan period.
- 1.3 The site known as Lakelands and is located to the west of Newtown Road in the settlement of Newtown. Newtown is located approximately 6km to the north west of Romsey, one of the two main settlements within the Borough. The site comprises an area of land currently containing 2 lakes, 2 buildings (which previously formed part of a larger single building) and a converted shipping container. The existing built form occupies a small section of the site. The remainder of the site is maintained grassland. Section 4 of these representations provides further details on the site and its suitability for allocation for residential development in the emerging Local Plan.
- 1.4 The site has not been previously promoted to the council; however, the site is available, suitable, achievable and deliverable and would help to meet Test Valley's housing need in a sustainable way whilst also providing benefits to the local community and the District's economy.
- 1.5 These representations will respond to the Local Plan Regulation 18 Stage 2 Consultation and will also present the opportunity which the land at Lakelands provides.
- 1.6 Submitted together with these representations is a site location plan which details the location and extent of the land at Lakelands. It is pertinent to note that there is relevant planning history which confirmed that the principle of residential development on the site was acceptable. An application for tourist accommodation is currently pending on the site. However, if the site were to be allocated it is considered that a residential use would be a more efficient use of land in this location.

2.0 [Response to Spatial Strategy](#)

- 2.1 We support the settlement hierarchy set out within Policy SS1 of the Draft Local Plan and support the primary focus of growth to be within the two tier 1 settlements; Andover and Romsey, where historically previous growth has also been focused. We would however encourage that the whilst the settlement hierarchy seeks to ensure proportionate growth is being directed to the most sustainable settlements in the Borough, small scale growth should be encouraged in smaller villages in the Borough to assist in sustaining the rural community and the existing facilities and services in these areas.
- 2.2 In order to both provide and maintain a robust housing land supply, in addition to focusing growth in the two principal settlements of the Borough, the Council should look to all settlements both in the hierarchy and in the countryside in sustainable locations to deliver homes through a range of small, medium and strategic sites. The land at Lakelands presents an opportunity for Test Valley to allocate a small scale partial brownfield site in the emerging Local Plan.
- 2.3 Paragraph 70 of the NPPF recognises the important contribution small and medium sized sites can make to meeting the housing requirement of an area as they are often built out relatively quickly. By allocating a range of sites, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements and to ensure Test Valley is not vulnerable to unsustainable, speculative development. Further, with the nature of the site being partially brownfield, it is considered that such a site should be prioritised for development in accordance with the Government's 'brownfield first' approach to new development.
- 2.4 It is acknowledged that the site is located outside of a settlement boundary and therefore in the countryside where residential development is usually resisted, however it should be noted that the site is a logical extension to the existing residential development running along the western side of Newtown Road.
- 2.5 Policy SS2 of the Draft Local Plan seeks to allow appropriate development in the countryside. Criterion a) of this policy allows development outside of settlement boundaries if the proposed development is allocated or allowed in another policy of the Local Plan. At present, without allocation the Lakelands could be developed for affordable housing, however we believe that the site provides a great opportunity to contribute to Test Valley's Housing Land Supply for a mix of housing types and tenures and therefore believe it should be allocated through the Local Plan for both market and

affordable housing. The planning history for the site should be carefully reviewed as the principle of residential development was previously accepted on the site.

- 2.6 Section 3.45 of the Draft Local Plan confirms that the Council is committed to creating and maintaining sustainable rural settlements. We support the Council's aim for the spatial strategy and policies to seek to support and enable appropriate development in the rural areas of the Borough to meet local needs whilst ensuring that proposals do not conflict with the policies which aim to respect the environment. Further, as encouraged by the NPPF, brownfield sites should be prioritised for redevelopment.

3.0 [Response to Housing Provision](#)

- 3.1 Policy SS3 of the draft Local Plan sets out the Housing requirement for the Borough over the plan period. Table 3.1 sets out that from the period 2020 – 2040 11,000 homes will be provided in the Borough, 4,730 (43%) of this housing provision will be provided in the southern area of Test Valley with a focus on growth in Romsey, one of the two main settlements of the district..
- 3.2 The figure of 11,000 homes is indicated as a minimum number of homes to be delivered over the plan period. We are supportive of this minimum figure and encourage the council to be ambitious to allocate a sufficient number and variety of sites to ensure that the Local Plan seek to support the Government's objective of significantly boosting the supply of homes as set out in Paragraph 60 of the NPPF.
- 3.3 Paragraph 3.55 of the Draft Local Plan confirms that to inform the housing requirement of the Borough, two studies have been undertaken and comprise part of the Local Plan's evidence base. These two studies together with the standard method provided by the Government have been used to calculate the housing need over the plan period. Whilst we are supportive of this method, as it is consistent with paragraph 61 of the NPPF which requires strategic policies to be informed by a local housing need assessment when determining the minimum number of homes needed, we believe that the council should be more ambitious with its housing numbers. The council must also look to and ensure that unmet need for neighbouring authorities is being accommodated with the Borough.
- 3.4 As per paragraph 61 of NPPF, the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. Further, as per the Planning Practice Guidance (PPG) Paragraph: 001 Reference ID: 68-001-20240205, the standard method for calculating local housing need provides a **minimum** (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the housing requirement in their plan unless exceptional circumstances justify an alternative approach. We do not believe that there are any exceptional circumstances which would justify an alternative approach in Test Valley.
- 3.5 Indeed, in order for the Local Plan Review to meet the 'positively prepared' test of soundness as required by paragraph 35 a) of the NPPF, the Local Plan review must:

“provide (ing) a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”.

- 3.6 We support the Council’s approach to housing delivery in north and south areas of the Borough and also support the different approaches in each Housing Market Area (HMA) set out in Figure 3.2 of the Draft Local Plan. The housing strategy seeks to ensure that the strategy and delivery of homes is suitable and sustainable to meet identified local needs. The split of homes between the southern and northern areas of the Borough with 57% of the housing requirement being met in the northern area is a decrease of the current split of 67% being provided in this area. We understand that this change in split is due to the change in HMA boundaries and therefore support this. We also support the council’s approach to use HMAs for the purpose of calculating the five-year housing land supply.
- 3.7 Another pertinent point to note with regards to the proposed site allocations is the impact which the recent mandatory Biodiversity Net Gain (BNG) will have on the capacity of these sites. The requirement for BNG onsite may have a significant impact on the ability for the sites to deliver the number of homes they are allocated for. Therefore, to ensure that the Local Plan can meet the identified housing needs and is positively prepared, the Council need to ensure that the housing numbers each site is proposed to be allocated for is realistic and achievable. It is considered that the Council should also look to further small and medium sized sites to assist in the delivery of the shortfall of homes which may be generated through the BNG requirement. Sites such as the land at Lakelands are a suitable size to assist in providing the short to medium term boost in housing supply.

4.0 Land at Lakelands – The Opportunity

- 4.1 The site, land at Lakelands, is located to the north of Newtown which is a settlement located to the north west of Romsey. The site is located within the countryside as the settlement of Newtown does not have a settlement boundary.
- 4.2 As set out above, the site currently comprises an area of land currently containing 2 lakes, 2 buildings (which previously formed part of a larger single building) and a converted shipping container. The site slopes down in a south-westerly direction from Newtown Lane. There are a number of mature trees present on the site, however these are located along the boundaries of the application site and provide effective screening of the application site.
- 4.3 The site is denoted by the red line on the extract from the site location plan below.



- 4.4 The site is accessed directly from Newtown Road to the east. To the south of the site are dwelling and further to the north beyond a paddock is more residential development which runs along Newtown Road. To the east and west of the site are areas of grassland and woodland.
- 4.5 There are no known environmental, heritage or landscape designations that apply to the site itself. The site is located within flood zone 1 as confirmed by the Environment Agency which means there is a very low risk of flooding from both rivers and the sea. The site is therefore relatively

unconstrained and there would be no constraints which would prevent it from being developed for new homes.

- 4.6 The site has the capacity to accommodate circa 2-3 homes at a density appropriate to the existing built form and the surrounding area whilst retaining and enhancing the lakes on site. It is considered that the site could provide the mandatory 10%, or more, BNG on site.
- 4.7 The land at Lakelands presents a rare opportunity for a partially brownfield site in a sustainable countryside location to be developed to deliver much needed high-quality homes for people within the Borough.
- 4.8 The site would constitute a logical, sustainable and proportionate extension to Newtown and is available for development now. The site is in single ownership and therefore there are no constraints regarding land ownership. The site provides a great opportunity for proportionate growth to a village.
- 4.9 In accordance with the definition of 'deliverable' within the NPPF (2023), the site is available for development now, is in a suitable and sustainable location for future residential development and it is achievable with a realistic prospect that housing will be delivered on site within five years following the sites allocation.
- 4.10 It is acknowledged that the site may not be large enough for allocation in the Local Plan, however it should be considered for allocation at local level through a Neighbourhood Plan.

5.0 Conclusion

- 5.1 As highlighted in these representations, we would like to highlight the suitability of the land at Lakelands which is suitable to come forward in the plan period and would provide a key contribution to the small sites which would be able to deliver in the early years of the plan period.
- 5.2 In accordance with the definition of 'deliverable' within the NPPF (2023), the land at Lakelands is available for development now, it is a suitable and sustainable location for future residential development, and it is achievable with a realistic prospect that housing will be delivered on site within five years following its allocation.
- 5.3 In light of the above and the details provided in these representations, it is requested that the Council review their allocated sites together with their housing requirement and look to allocate additional small sites, such as land at Lakelands to meet Test Valley's housing need over the plan period and beyond. If the site is considered too small for allocation we would request that the countryside policy is amended to allow for the site to come forward, together with other small sustainable sites, for residential development in the plan period.
- 5.4 We trust the information contained within these representations is sufficient, however should you require any further information please do contact us.



Dimensions shall not be scaled from this drawing. All figured dimensions must be figured on site. Discrepancies are to be notified immediately to the engineers.