

# 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 6<sup>th</sup> February to noon on Tuesday 2<sup>nd</sup> 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](http://www.testvalley.gov.uk/localplan2040)

Once the form has been completed, please send to [planningpolicy@testvalley.gov.uk](mailto:planningpolicy@testvalley.gov.uk) below by **noon on Tuesday 2<sup>nd</sup> 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](http://www.testvalley.gov.uk/localplan2040)

Email: [planningpolicy@testvalley.gov.uk](mailto: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)	Mrs	First Name*	Caroline
Surname*	Jezeph		
Organisation* (If responding on behalf of an organisation)	BJC Planning		

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:

--

### 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:

## 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

The Plan refers to 'designated rural areas'. This should be defined in the glossary.

Agree the revised boundary of the Housing Market Areas. This is now a much better reflection of the housing in the Borough.

#### Presentation

The Policies should be more clearly labelled. The presentation of white ink on a blue/green background is:

- 1).hard to read
- 2) impossible to copy electronically. In order for quotes in planning statements and appeals to be accurate it is preferable to copy and paste the text electronically rather than copy type.

Plans on pages 144 and 145 relating to sites potentially suitable for wind energy developments are:

- 1) Not referenced with a Figure of Plan No
- 2) Of insufficient detail to be usefully understood. The base map needs changing.

Paragraph 5.160 'there' should be changed to 'their'.

### Vision

The Local Plan sets out the Vision for the Borough in Section 2. It states on Page 20:

**Deliver and strengthen sustainable, cohesive and healthy communities in our towns and villages. Secure lasting benefits for our communities, including enhancements to social, green, health, educational and other local infrastructure through new development in sustainable locations. Support the viability of the Borough's town and local village centres in meeting many of the daily needs of our communities and residents.**

It is noted that in both the Regulation 18 Stage1 Plan and in this Regulation 18 Stage 2 Plan the spatial strategy offers greater support to rural settlements. This was supported in the previous consultation with the expectation that more specific policies would emerge in the Stage 2 Plan.

In addressing the Spatial Strategy paragraphs 3.14 and 3.15 indicate that the Plan seeks to support and sustain communities whilst recognising that much of the Borough is rural. It is considered that the Plan fails in this endeavour.

At paragraph 3.16 it is indicated that for development within smaller communities reliance will be upon Neighbourhood Plans and Village Design Statements. This is less than satisfactory for the reasons set out below.

#### Neighbourhood Plans and Village Design Statements

Whilst Neighbourhood Plans may be favoured as they pass control to local people it is often the case that such plans fail to reach the wider community and are steered by a few interested and articulate individuals. The policies are at times weak and conflicted having not been subject to the more rigorous scrutiny of a team of professional planners as in the case of the Local Plan.

Village Design Statements are not intended to be vehicles for proposing development such as housing, shops or industry. They provide a useful indication as to what local people consider to be important in their community, but they make no provision for new development. They are usually pre-occupied with the history of the settlement and might offer some guidance on design aspirations.

The Council is looking to remove settlement boundaries from Tier 4 villages. This will erode the opportunity to bring forward development within the currently defined settlement boundaries of the Tier 4 villages thereby depriving them of development opportunities.

It is also noted in paragraph 3.73 that there are no development allocations to meet local needs in the Tier 3 villages. It is presumed that the Neighbourhood Plans will provide for new development. The Plan has indicated at Policy SS5 and paragraph 3.91 that Neighbourhood Plans will be required to provide a minimum of 10 new homes over the Plan period.

Not all settlements will want to provide a Neighbourhood Plan so these settlements will not be required to make housing provision.

Paragraph 3.91 suggests that the requirement in Neighbourhood Plans for the provision of a minimum of 10 new dwellings over the Plan period will ensure that affordable housing can be provided in these rural areas. These numbers are so low that the contribution to affordable housing is likely to be minimal. Furthermore, if these housing numbers come forward over just a few small sites, which tends to be favoured in villages, then the requirement could fall below the affordable housing thresholds set out in Policy HOU1.

Under this development strategy new housing will be steered by the Local Plan to Andover, Romsey and the Tier 2 settlements. The latter are focussed in the south of the Borough.

This development strategy does not fit with the statement:

**‘the spatial strategy identifies a wider distribution of development than set out in our current Local Plan 2016.’** (Para 3.14)

The strategy will restrict the opportunity for new development in the settlements which need to grow to prosper.

#### Settlement Hierarchy and Settlement Boundary

The Regulation 18 Stage 2 Plan has also reviewed the settlement hierarchy and the settlement boundaries.

The Review has seen a different approach to the assessment of settlements as made under the original Rural Facilities Survey. Changes in the provision of bus services have resulted in access to public transport changing. This has impacted on where some settlements now sit in the settlement hierarchy as the level of public transport is now removed from the methodology.

It is recognised that sustainable forms of transport are important in a rural area. It is unfortunate that the criterion of proximity to bus services has now been omitted from the review of settlements as it remains an important consideration. It is noted that the assessment review still does not take into account the suitability of the use of the bicycle. This was raised at the Stage 1 consultation. Why is accessibility to good cycle routes not a key consideration? This should be included.

Arising from these changes to the review of the settlement hierarchy comes the decision to remove the Tier 4 settlements which now lose their settlement boundaries. Strong objection is made to this proposed change which serves to further undermine the many rural communities on Test Valley.

It is noted that the review of the boundaries of Tier 3 settlements has resulted in a reduction in the extent of the settlement boundaries. The review has seen very modest changes to include more land, but a greater number of reductions in the settlement boundaries as areas of open space, recreation ground, allotments and school playing fields are now excluded. It is only by permitting some growth in the settlements that their viability and vitality can be assured and they may be sustained in the longer term.

Objection is made to the following:

The absence of any allocations for development in Tier 3 settlements.

The removal of the settlement boundaries in Tier 4 settlements

The reliance on Neighbourhood Plans and Village Design Statements for housing allocations.

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
Para 5.116	The proposed review of the evidence on shopping patterns post pandemic is supported.
Para 5.130	Given that the Council's Heritage Topic Paper is 'emerging' how can it explain the Local Plan approach to heritage? Surely it is for the Local Plan to set out the approach to heritage. This might then be amplified by an emerging Heritage Topic Paper.
Paras 5.157-5.160	Section 'Assessing Harm to Heritage Assets' Although there is reference to 'less than substantial harm' there is no description as to how this would be assessed. The focus is upon 'substantial harm' yet it is more often the case that a proposal may be considered to result in 'less than substantial harm'.
Policy CL3	Sustainable Buildings and Energy Use 'New Non-Residential Development' It should be made clear if this part of the policy is to apply also to 'changes of use' of sites above the given threshold.

### 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.