Planning Policy

From:

steve lees <

Sent:

03 September 2018 09:46

To:

Planning Policy

Subject:

issues and options submission

Attachments:

P20.6.2180729 issuesand optionsrepsonse.docx

Good morning

Please find enclosed a submission on behalf of Timsbury Holdings Ltd

Steve Lees

Planning Consultant



Response To Test Valley Borough Council Issues
And Options Consultation For The Next Local Plan
On behalf Of Timsbury Holdings Limited

Steve Lees MRTPI

September 2018

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Summary

The opportunity to comment on the Issues and Options Consultation document at an early stage of the review of the adopted local plan is welcomed.

The provision of housing to meet the housing needs of the borough is a key task of the Council as the local planning authority. It is important that it identifies the right number of homes needed, how and where they will be located and that they will be delivered within the local plan period.

The provision of homes within the rural villages of the borough should be a key part of any future strategy to address issues of availability, affordability range and choice for residents.

A flexible approach to the assessment of the merits of the villages as locations for sustainable development should be taken.

The boundaries of the two HMAs covering the Borough should be reviewed.

1.Introduction

1.1 The purpose of this response is to set out the initial views of Timsbury Holdings Limited on the content of the Issues and Options Consultation published by Test Valley Borough Council in July 2018. It may wish to supplement the response in the light of changes in national planning guidance, relevant case law and the local planning context.

2.Response

- 2.1 This response focusses on some of the housing issues highlighted in the Living in Test Valley section of the consultation document and sets out comments in respect of a number of the questions posed.
- 2.2 The company agrees with paragraph 5.1 which states that providing the right number of homes in the right location is one of the most important challenges faced by a local planning authority. It also agrees that there are serious implications for the residents of the borough if enough houses to meet their housing needs are not provided.

Q4

2.3 The Company considers that the next local plan's housing policies should be based on the Government's standard methodology as there are no exceptional circumstances to justify an alternative approach.

Q5

2.4 The question only refers to the local plan increasing its housing requirement to help support economic growth. The relevant national guidance does not limit the provision of additional housing over and above that derived from the standard methodology to meet economic growth. In the

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context of paragraph 5.3 the Council should consider increasing its housing provision to influence the prices of homes within the borough.

Q6

- 2.5 In paragraph 5.6 the Council states that the Borough is covered by two housing market areas(HMA). It is not clear from the consultation document where the boundaries of the two HMAs are. It would appear to be the case that the boundary of the south Hampshire HMA corresponds with the boundary of the area covered by PUSH rather than on one based on an analysis of the factors which shape HMAs. which would place Timsbury in the rest of Test Valley HMA. Given its location relatively close to Romsey, its economic and social links with the town and the rest of south Hampshire there is a strong case for thorough review of where the boundaries of any HMAs should be drawn.
- 2.6 Such a review should consider the various factors which inform the extent of HMAS eg commuting patterns and educational catchment areas. The commuting patterns presented in Figure 11 do suggest that there is a strong link with south Hampshire ie approximately 43 per cent of all out commuting and 46 per cent of in commuting is to and from south Hampshire. Where Timsbury sits within those figures would help inform the review and the same would apply to the catchment areas of education, in particular those for further education.

Q8

- 2.7 With respect to the options for distributing new housing development the Company considers that whatever approach is selected it should have as its focus meeting the needs of residents and the delivery of the requirement identified in a form that contributes to the achievement of sustainable development and ensures a continuous five year supply of housing land.
- 2.9 It is likely that an approach which has elements of the options highlighted would most likely deliver the new housing needed rather than reliance on one or two of the options. Given the challenges of delivering new homes the Company would see considerable merit in the Council taking the lead and; identify the overall requirement, the quantum and broad locations where the requirement would be met with the specific allocations being identified either within the local plan or subsequent development plan documents prepared by it. Local communities should have an option to allocate sites to meet their share of the housing requirement through a neighbourhood plan.
- 2.10 To ensure that the borough's housing requirement is met there should be a fall-back position that in the event that a neighbourhood plan was unlikely to make the appropriate provision in a timely fashion where the Council would allocate land for development. This approach would make best use of the Council's role as the local planning authority whilst enabling local communities to play a key part in shaping their area.
- 2.11 identifying the housing requirement of an area on a pro-rata basis of population is an option worthy of serious consideration. It would highlight to communities the potential housing demands it would generate during the life time of the new local plan and inform discussions within a community as to how best they could be met.

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- 2.12 In considering the merits of the highlighted options for the distribution of development the issue of delivery should be an integral part of the process. The current and previous local plans prepared by the Council have relied to a large extent on a small number of large sites. The preparation of the next local plan provides an opportunity to consider meeting the housing requirement via a wider range of sites in terms of size as well as location.
- 2.13 The NPPF highlights the merits of bringing forward new homes in rural areas. New development can enhance or maintain the vitality or rural communities. In seeking to achieve sustainable development the status of the rural villages in terms of the availability of facilities and access to facilities in the larger towns and villages should be taken into account. They should not be ruled out as potential locations for development on the basis of the facilities available within them.
- 2.14 In many case within Test Valley the services and facilities in one village are shared with its neighbours. There are a number of villages located relatively close to the principal towns of Andover and Romsey which means that they are unlikely to support many of the day to day facilities one would otherwise expect to find. The proximity to the wide range of facilities of the larger towns should be a consideration when assessing the merits of these villages for development. The NPPF highlights this issue and promotes a flexible approach particularly in respect of smaller settlements which may look to others nearby for services and facilities.
- 2.15 It is widely recognised that to meet the needs of residents of rural communities they will need to travel out for access to facilities and this is a feature of rural life. The use of the car is necessary given the lack of alternatives. The use of on-line services, home deliveries and home working all contribute to reducing the need to travel out from villages.
- 2.16 In considering the merits of the highlighted options for the distribution of development the issue of delivery should be an integral part of the process. The current and previous local plans prepared by the Council have relied to a large extent on a small number of large sites. The preparation of the next local plan provides an opportunity to consider meeting the housing requirement via a wider range of sites in terms of size as well as location.
- 2.17 The next local plan provides an opportunity to play a more proactive role in the phasing of development across the borough. The merits of having safeguarding policies to enable a long term view to be taken rather than the shorter time horizon of rolling forward the current local plan from 2029 to 2036 should be considered Such an approach may be of particular value when considering development in the villages where the numbers required may be relatively small leading to an artificial arithmetical constraint to site selection which could result in piecemeal development. An approach which enabled land to be safeguarded for future development beyond the proposed end date of the local plan would provide a measure certainty for local communities as to how their long terms needs could be met, reduce the need for early reviews of neighbourhood plans and could secure greater benefits for the community.