

Planning Policy

From: Chris Rees
Sent: 14 September 2018 13:38
To: Planning Policy
Subject: Issues & Options consultation - response by Alfred Strategic
Attachments: TVBC Issues and Options Alfred Strategic Abbotswood House Annex 1.pdf; TVBC Issues and Options Alfred Strategic Abbotswood House.pdf

Dear Sir or Madam,

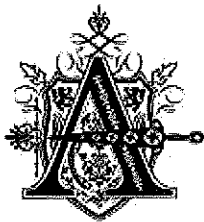
Please find attached a response to the Issues & Options consultation, with further details provided concerning land at Abbotswood House.

Please do contact me at any time if you wish to discuss the content of the representation.

Best regards

Chris

Chris Rees
Planning Director



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**Representations to the
Test Valley Borough Council Issues & Options Local Plan
Consultation**



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Contact:

Mr Chris Rees MRTPI

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1. Statement of Purpose

- 1.1. The Statement is submitted in response to and to inform the Borough Council's Issues & Options Paper of the emerging Local Plan. The Statement provides commentary on the questions raised by the Borough Council within its background papers, while presenting an opportunity for a residential allocation on land at Abbotswood House, Romsey. A site plan setting out the land in question edged in red is provided within Annex 1.



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2. Q.4,5 and Q6 Housing Growth

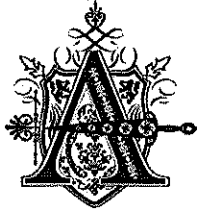
- 2.1 The Government's move to standardise the calculation of housing requirement is welcomed, and should provide more clarity for Local Authorities, communities and the development industry alike insofar as providing a clear path to how the annual requirement is calculated. The supporting Paper to the Issues & Options consultation raises two important points, namely should the Borough be planning for more homes than that generated by the standard methodology, and secondly, should southern Test Valley remain linked to the Southampton HMA?
- 2.2 To answer the first question, it is necessary to understand the implications of the wider HMA and the role of those Authorities that surround Southampton as the principal Urban Area. It is the case that towns such as Romsey represent for many a place to aspire to live, particularly those within the larger, more densely populated urban areas such as Southampton.
- 2.3 As a popular and thriving market town, Romsey represents a key location for inward migration into the Borough, as well as relocation from within the Borough and will continue to do so for years to come. This demographic pattern will need to be taken into account in forming the housing requirement and supports the approach to date of a specific housing requirement for the southern Test Valley.
- 2.4 Separately, much of the Government's concern and the drive towards a standard methodology concerns the need to address affordability within the Housing Market. It follows that where demand outstrips supply, prices become inflated and affordability worsens. Beyond therefore what can be considered to be affordable housing tenures (see Section 4), there is a need via the headline Housing Requirement figure to consider and account for open market affordability within the local housing market.
- 2.5 While delivering the minimum required is often the most palatable scenario for many, it can result in serious socio and economic consequences during the Plan Period. Such scenarios can be avoided through identifying an appropriate Housing Requirement that not only meets affordable housing needs, but also provides a supply that responds to net migration and overall matters of affordability within the Borough.



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3. Q.8 Housing Distribution

- 3.1. As set out within Section 2, Romsey continues to be the principal town within the Borough, and one which will continue to attract inward migration as people aspire to live within the market town and benefit from its services and facilities.
- 3.2. With good levels of connectivity to surrounding towns and villages, as well as being the principal service centre within Southern Test Valley, Romsey should continue to be the focal point for future housing growth via the Local Plan Review. To deviate from such a spatial strategy would be to the detriment of the town.



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4. Q.10 and Q.12 Affordable Housing

- 4.1. Regardless of the percentage or trigger point beyond which affordable housing is required, the success of any affordable housing policy can be measured on its flexibility and ability to react and accommodate different circumstances. While the Local Plan process will test various viability scenarios, each development scheme will bring with it differing opportunities and constraints, as well as variations in the market and resulting land value at the point of delivery.
- 4.2. The revised NPPF has furthered the opportunity for Local Planning Authorities to expand on the type of housing that falls under the 'affordable' banner, and these changes should be incorporated into the emerging Local Plan and associated Affordable Housing Policy. Initiatives such as low-cost open market housing is an innovative way of allowing a development of scale to incorporate a wider range of tenures within the final scheme to cater for a broader section of the community, alongside more traditional housing products such as affordable rent and shared ownership.
- 4.3. Offering such flexibility will improve the range and quantum of affordable housing delivered within the Borough during the life of the Plan Period.
- 4.4. As an aside and in respect of Question 12, in principle yes, the delivery of open market housing as part of rural exception sites can both significantly improve the chances of such schemes coming forward and delivering affordable housing within rural communities but can also aid with delivering a balance of tenures in any one location. Such initiatives have been incorporated into rural exception scheme policies within other Local Authorities and have proven successful.



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5. Q.16, Q.18 and Q.19 Housing Mix, Density and Internal Space Standards
 - 5.1. The application of a housing mix policy can have significant consequences both in terms of the deliverability of the land, but also on what can be considered the most appropriate development for any given site. The housing market will always react to meet demand, particularly within developments of scale, where varying the housing product will cater for and meet demand from different sections of the community.
 - 5.2. Moreover, the character and appearance of a development will largely be dictated by the mix and type of housing proposed and will respond to the local environs. To seek to artificially control either of these aspects of housing delivery would have negative consequences, both in terms of curtailing the ability to deliver the most aesthetically appropriate development scheme, but also in seeking to meet housing demand at that point in time and in that location.
 - 5.3. We would urge caution therefore in any new Policy that sought to artificially control the mix on each and every housing site within the Borough.
 - 5.4. With regard to Question 18 and densities, again such policies can artificially constrain development and would not always result in the most appropriate development. A policy that seeks to promote the efficient use of land can be appropriate, and provide a policy test against which planning applications can be judged against local context, but to seek a blanket minimum or maximum within areas of the Borough would not in our view be appropriate.
 - 5.5. With reference to Internal Space Standards, we would refer the Council to the Inspector's Report into the Winchester City Council Local Plan Part 2, whereupon considering such a Policy it was rejected. Such policies can have significant unintended consequences, both on existing housing stock values and new build values which, in turn, affect overall affordability.



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6. Land at Abbotswood House

- 6.1. As per the site plan annexed to this representation, there exists the opportunity to deliver some circa 2.3 hectares (5.7 acres) of land for residential use to the east of Braishfield Road, Romsey.
- 6.2. With the recent Planning Approval at Abbotsford, immediately to the north of the subject site (Appeal Ref 3170081 / Local Plan Ref 15/03137/OUTS), the land finds itself completely surrounded by either existing residential development (to the south), recently completed residential development in the form of Abbotswood development located to the west, and that currently under construction to the east in the form of Ganger Farm and to the north by Abbotsford.

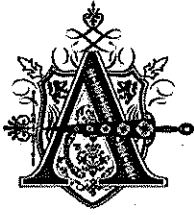
Figure 1: Site Location





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- 6.3. While subject to countryside policies, the land shares the same environs as that to the north considered recently on Appeal, where the Inspector concluded that in respect of Policy COM2 '*...it is clear that the aim of that policy is to direct development to the most sustainable locations and in so doing to reconcile the need for development with the need to protect the countryside. The appeal scheme would be located very close to the existing settlement and would benefit from easy access to existing facilities and services therein. Further, it is divided from the countryside by the large Ganger Farm development and is in a generally suburban context. Those matters, together, significantly limit the appeal site's contribution to the countryside. Whilst I acknowledge RLP Policy COM2 forms an intrinsic part of the spatial strategy for the RLP, in the circumstances of this appeal, the proposed development would not materially undermine its spatial strategy or the intrinsic character and beauty of the countryside. This limits the weight that I attach to the development plan conflict that I have identified'* (Paragraph 23).
- 6.4. This limited contribution to the countryside is further exacerbated on the land at Abbotswood House having now been completely enclosed by residential development on all sides, and thus its delivery for residential use would not impinge on the character and beauty of the countryside.
- 6.5. In capacity terms, the land could deliver circa 55 residential dwellings of varying tenure, inclusive of affordable housing and an array of house types, from small scale apartments through to larger detached housing. Accessed from Braishfield Road, the proximity and accessibility of the land to the services and facilities of the town is a match for the recently completed developments at Abbotswood and that under construction to the north at Abbotsford, and thus can be considered to represent a sustainable development location.
- 6.6. With a development partner secured, the land is deliverable and available for development, and given the shared nature of the land with that recently approved to the north, should also be considered suitable.
- 6.7. Recent developments in the vicinity of the subject site has changed the character of the area significantly, and this parcel of land is now available to make a contribution towards the delivery of housing within Romsey and contribute to the Council's overall objectives during the Plan Period.
- 6.8. We would welcome the opportunity to discuss the future identification and delivery of a residential development on land at Abbotswood House with the Local Planning Authority in due course.



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Annex 1: Site Location Plan Abbotswood House

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