Plann	ing	Policy

From:

Elizabeth Burt - TW Southern Counties

Sent:

14 September 2038 15:19

To:

Planning Policy

Subject:

Local Plan Issues and Options response

Attachments:

Representations to I&O Local Plan 130918.pdf

Dear Sir/Madam

Please find attached representations on the Local Plan Issues and Options from Taylor Wimpey Strategy Land.

I would be grateful if you could confirm receipt of these representations.

Kind regards

Elizabeth

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Taylor Wimpey UK Ltd Strategic Land

13th September 2018

Dear Sir/Madam

## Representations on Test Valley Borough Council Issues and Options Consultation for the next Local Plan

Please find below comments on the Test Valley Borough Council Issues and Options Consultation for the next Local Plan. These are submitted by Taylor Wimpey Strategic Land who is promoting land west of Valley Park, Castle Lane, North Baddesley for residential development. A site plan is attached at Appendix 1

Q3: What should the Local Plan aspirations be for the next 20 years?

The Local Plan should plan positively for the Borough over the next 20 years. It should identify its housing needs for the Borough using the most up to date methodology and meet this need through the allocation of a suitable number and range of sites. It should seek to locate development in sustainable locations and to support communities through the provision of new development and infrastructure.

Q4: Should the Local Plan's housing requirement be consistent with Governments standard methodology?
Do you have any evidence to support your view?

The Local Plan should calculate its housing need based on the most up to date methodology at the time. The Council should then meet this need through the identification of a suitable range of sites and broad locations.

Q5: Should the Local Plan increase its housing requirement to help support economic growth? If yes, do you have any evidence to support this?

The revised National Planning Policy Framework (NPPF) (2018) identifies at paragraph 60 that "To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be mot within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." It is clear therefore that market signal should be taken into account when determining the minimum number of homes needed. Any housing number should be calculated using the most up to date methodology at the time.

Q6: Do you think the HMA boundary is broadly right? If not, how and why do you think it should be changed?

Taylor Wimpey would support the Council in reviewing the current HMA boundaries to see if they continue to be appropriate and the best strategy on which to calculate and apportion housing need.

Q7: Are there any other approaches to distributing development across the Borough that we should consider?

Taylor Wimpey supports the approach to testing a range of strategies for distributing development across the Borough in order to determine an appropriate strategy. Allocating sites next to existing larger settlements is an appropriate strategy. The land west of Valley Park, Castle Lane, North Baddesley which Taylor Wimpey is promoting, adjoins existing development and is a suitable and available site for housing and an extensive area of open space and woodland. The site was submitted to the Council as part of its Call for Sites in October 2017 and is enclosed at Appendix 1 to this letter.

Q8: Do you have any comments on the approaches suggested above?

Taylor Wimpey supports a development strategy which tooks to allocate larger sites to the most sustainable settlements within the Borough as well as supporting smaller villages and communities through an appropriate level of development to support their function and role.

Q9: How should the settlement boundaries be defined in the next Local Plan?

Drawing settlement boundaries around physical boundaries is considered to be an appropriate starting point. There is likely however to be instances where physical boundaries are not the most appropriate, for example large areas of curtilage on the edge of settlements, and boundaries may need to be drawn through these. It is important that local knowledge is used when redrawing boundaries as setting and character of an area can be important to how limits of settlements are perceived. It is also important to recognise that when considering development proposals, other material considerations beside settlement boundaries should be taken into account including the form and character of the proposed development and its relationship to the wider area.

Q10: Do you think we should continue with seeking up to 40% of new homes to be affordable, or should we change the percentage?

The level of affordable housing should be set out based on up to date evidence on housing need and the viability and ability of development to deliver this. In order to respond to market signals and changing needs, any requirements for affordable housing should include flexibility in terms of amount and type of housing, particularly given policy changes which can introduce new forms of housing under the definition of affordable.

Q11: What should the trigger be for seeking affordable housing?

Affordable housing requirements should be in accordance with national planning policy and also reflect the specific circumstances of the area in which it is operating in terms of need, values and viability.

Q15: Should the Council change its approach and set out a requirement that certain sites should provide for the needs of such groups as the elderly?

The NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. The Council should gather an evidence base on housing need and determine whether specific policies or sites are required to meet specific housing needs. Any requirements should take account of the viability of sites.

Q16: Should we include a policy that requires a mix and type of housing, or should the housing market inform what mix and type of housing to build?

The NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. The Council should gather an evidence base on housing need and determine whether specific policies or sites are required to meet specific housing needs. Any requirements should take account of the viability of sites.

Q18: Should the Council establish density standards in the Local Plan?

It is considered that the NPPF sets out clear guidance related to the character and form of design and this alongside site specific policies and design policies in a Local Plan can ensure an appropriate form of development comes forward. Therefore, it is not considered that specific density standards are required in the Local Plan.

Q19: Do you think we should establish internal space standards for future homes?

It is considered that national requirements on space standards are the most appropriate. Using these ensures that if national policy changes the Local Plan will not become out of date.

Q33: Should we continue to retain the principle of Local Gaps? Should we define specific boundaries or a more general policy which aims to avoid coalescence?

It is considered that policies related to the location and character of development can be used to ensure settlements retain separate settlement identity. Any gap designations should be fully justified against policy and it must be clear why other policies in the Plan cannot deal with such areas between settlements.

Q39: How can we improve design quality within the Borough?

Chapter 12 of the NPPF states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve and that plans should set out a clear design vision and expectations. This provides the Council with the flexibility to create design policies that respond Borough wide as well as to specific areas.

**Q40:** Should the local plan be specific on the type of open space to provide or should it take account of existing provision/ future requirements?

The requirements for open space as part of new development should be informed by robust evidence on the need for this informed by existing provision and deficiencies both in quantative and qualitative terms. The scale and nature of such provision should be commensurate with the scale of development proposed.

**Q42**: Should alternative open space for mitigation be provided as part of new developments or should land be specifically allocated, or a combination?

The Council should identify any requirements for development to mitigate potential impacts on existing sites with a clear justification for this. As per other authorities a combination of onsite mitigation and offsite mitigation depending on the impact, size of development and its location in relation to potential impacts, can be an appropriate strategy.

Q44: How can the Council promote more sustainable forms of transport such as walking, cycling and public transport?

The Council should seek to locate development close to sustainable forms of transport and to make on site provision for such modes. Developments, particularly those on larger sites, also provide opportunities to enhance existing sustainable forms of transport and to introduce site specific measures such as bus passes and discounts to encourage their use.

Elizabeth Burt
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Telephone

Yours faithfully

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