

# Test Valley Borough Council Next Local Plan - Refined Issues and Options Consultation

## COMMENTS FORM

Test Valley Borough Council has published for public participation its Refined Issues and Options document. This is the second stage of preparing the next Local Plan, which follows the Issues and Options consultation in 2018.

You can respond to our consultation by filling out the form below. Further information can be found on our website at: [www.testvalley.gov.uk/nextlocalplan](http://www.testvalley.gov.uk/nextlocalplan)

The consultation period runs from Friday 3 July 2020 to 4.30pm on 28 August 2020. Please respond before the close of the consultation period.

Once the form has been completed, please send to

If you are unable to send via email, please send a postal copy to our address below.

### Contacting us

We are happy to help. If you have any queries, please contact us at:  
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/nextlocalplan](http://www.testvalley.gov.uk/nextlocalplan)

## Part A: Your Details

Please fill in all boxes marked with an \*

Title*		First Name*	
Surname*			
Organisation* <i>(If responding on behalf of an organisation)</i>			

If you wish your comments to be acknowledged and to be kept informed of progress, please provide your email address below:

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

If you don't have an email address and wish your comments to be acknowledged and to be kept informed of progress, please provide your postal address.

Address*		
	Postcode	

If you are an agent 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 for a period of 6 months after the next Local Plan is adopted.

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

<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

## Part B: Your Comments

Please use the boxes below to state your comments and questions. Please make it clear which paragraph or question your comments relate to where possible.

Paragraph / Question Ref	Comments
Various	Please refer to attached Statement for detailed comments

*Please use next page if necessary*

--	--

**What happens next?**

All valid responses will be acknowledged and you will be given a reference number. Please quote this number when contacting the Council about the next Local Plan. If you have an agent acting on your behalf, correspondence will be sent to your agent.

All response received will be taken into account as part of the preparation of the next Local Plan.



**Representations to the Test Valley Refined  
Issues and Options Consultation for the Next  
Local Plan  
on behalf of Rownhams Promotions Limited**

August 2020

**Pigeon Investment Management Ltd**

[www.pigeon.co.uk](http://www.pigeon.co.uk)

## Contents

1.	Introduction	1
2.	Response to Consultation Questions	2
3.	Fields Farm Site Specific Comments	9
4.	Summary and Conclusions	16

# 1. Introduction

- 1.1 Rownham Promotions Limited is pleased to have this opportunity to comment on the Test Valley Refined Issues and Options Consultation Document dated June 2020 (referred to hereafter as the 'Consultation Document'). Rownhams Promotions Limited is promoting land at Fields Farm, Rownhams Lane, Rownhams ('the Site') for residential development.
- 1.2 Our response below focusses on those matters/questions of relevance in the context of our interest in the Site, although we reserve the right to comment on additional matters at a later stage of local plan preparation, if this is required. These representations address the following issues and questions posed in the Consultation Document:
- Plan Period;
  - Housing Requirement;
  - Housing Market Area Boundaries;
  - Development Distribution;
  - Settlement Boundaries;
  - Self and Custom Build Housing.
- 1.3 These representations are supported by specific comments in relation to the Site, which have been informed by technical work undertaken to date in relation to the previous application/appeal proposals. It is acknowledged that the proposals set out in these representations will require refinement to address the emerging policy context and the reasons for refusal set out in the appeal decision. This is addressed further within Section 3 below.
- 1.4 An updated Illustrative Concept Masterplan to illustrate how the proposed development at Fields Farm could be successfully designed and delivered within the Site has been prepared and accompanies this submission.

## 2. Response to Consultation Questions

- 2.1 The following section sets out Rownham Promotions' comments on the issues and questions raised in the Consultation Document which are considered most relevant to our interests.

### Plan Period

- 2.2 Section 4 of the document discusses the issues and options with regard to the potential end date of the Plan. Whilst an end date of 2036 was previously suggested at Issues and Options stage it is suggested that this may need to be extended.
- 2.3 As the Council correctly note, paragraph 22 of the NPPF requires that the strategic policies within the local plan should cover a minimum period of 15 years from the point at which the plan is adopted. The Council's current LDS suggests the potential adoption of the Plan in the latter part of 2024, though experience suggests that these timescales could slip and the process take longer. Consequently, given the uncertainty over how long the plan will take to be prepared and examined we would suggest that the Council builds in some flexibility and plans for a period beyond this minimum in order to ensure it is achieved. As such, we would suggest as a minimum the Council plans for at least an 18-year plan period from the point at which the Council fixes its evidence on housing needs using the standard method (i.e. Regulation 19 stage). This stage is expected to be reached in late 2022 / early 2023 and as such, we would suggest an end date for the Plan of 2040 or 2041 is likely to be necessary.
- 2.4 The reason for this recommendation is that the standard method effectively creates the starting point in any plan as it uses the current year as the start of the base period for the calculation of the local housing needs assessment (LHNA). This is set out in paragraph 2a-004 of the PPG which states that the first step in calculating housing need using the standard methodology is:
- "Taking the most recent projections, calculate the projected average annual household growth over a 10-year period (this should be 10 consecutive years, with the current year being the first year)."*
- 2.5 The PPG goes on to state in paragraph 2a-008 that the LHNA can be relied upon for a period of two years from submission of the Plan. Given that the standard method seeks to wrap up under, or over, delivery from previous years through the affordability adjustment it is not appropriate to include years prior to the base date for the affordability evidence used in the assessment of housing need being undertaken within the plan period. As such it would be appropriate to start the plan period from the base date of the affordability data used in the LHNA and allow for 2 years for submission, examination and adoption.
- 2.6 On this basis an 18-year plan period extending to 2040 or 2041 would ensure that the plan is consistent with the minimum 15-year plan period required by the NPPF and guidance on local housing needs assessments in the PPG. It would also mean that the Plan is likely to be



aligned with the joint Statement of Common Ground being prepared by the Partnership for South Hampshire (PUSH).

### **Housing Requirement**

- 2.7 Section 5 of the document discusses the issues in relation to housing and communities and correctly identifies that meeting future housing needs is one of the greatest challenges for the next Local Plan.
- 2.8 In this context, we are pleased to note that the Council's current expectation is that the housing requirement for the Plan will be based on meeting the Standard Methodology figure in full. In this regard, it is not considered that there are any exceptional circumstances which would justify an alternative approach whereby a lower amount of housing would be provided.
- 2.9 We would agree that the application of the current Standard Method results in a local housing need assessment (LHNA) of 550 dpa. However, the NPPF recognises this figure is a minimum and outlines in Planning Practice Guidance that there will be circumstances where local planning authorities may need to plan beyond this minimum. One scenario is where the housing needs of a neighbouring area cannot be met. The consultation document states that at present there is no evidence of any unmet needs in neighbouring local authority areas. The Council will need to keep this under review through ongoing discussions with neighbouring authorities under the Duty to Cooperate.
- 2.10 In particular, the Council will need to engage closely with the other PUSH authorities, particularly neighbouring Southampton City Council who are also currently at the early stages of preparing a new local plan. Given that the City's administrative boundary is tightly drawn it may be difficult for it to meet its own needs and it will be necessary for neighbouring authorities such as Test Valley to work with the City Council to ensure their (and other PUSH authorities') development needs are met.
- 2.11 In any event, as the Council notes, the standard methodology is likely to change later this year and prior to the publication of future iterations of the Local Plan. The Government's proposals for changing the Standard Methodology have now been published for consultation and we note that on the basis of the new Standard Method being proposed, Test Valley's LHNA would increase to 813 dpa. Accordingly, it would be prudent for the Council to start considering how it would deliver this higher level of housing need and to factor this in to the consideration of sites as part of the production of the Preferred Options Draft Local Plan due for publication next year.

### Housing Market Areas (Questions 1-3)

**Question 1 - Should (a) we maintain the two existing HMAs, but perhaps with a revised boundary between them, such as enlarging the area within STV HMA. If so, what additional area(s) of the Borough should be included within STV HMA? Alternatively, (b) should a single HMA for the whole of Test Valley be used? Or (c) should additional HMAs be created, increasing the number to 3 or 4, with the additional HMA(s) applying to the rural area?**

- 2.12 The consultation document includes a number of questions in relation to the definition of Housing Market Areas. When examining the use of housing market areas (HMAs) in plan preparation it is important to consider the changed Government guidance with regard to the assessment of housing needs. The current Local Plan was prepared in accordance with the 2012 NPPF which introduced HMAs as a means of considering wider cross boundary housing needs as part of the objective assessment of housing need. In the case of Test Valley, it was considered that the Borough fell into two housing market areas with the southern boundary being largely defined by the extent of the Partnership for Urban South Hampshire (now the Partnership for South Hampshire). The 2012 NPPF was clear that the needs of the HMA must be met in full and as such required Council's in the same HMA to work together in meeting those needs.
- 2.13 However, the 2019 NPPF no longer relies on HMAs for the assessment of housing needs. The main function of HMAs in the 2019 NPPF is with regard to cross boundary co-operation on strategic matters and the preparation of statements of common ground as set out in paragraph 61-017 and 61-018 of PPG. Unmet need for housing similarly is not based solely on HMAs with Councils being asked to consider this on the basis of neighbouring areas which may not necessarily align with HMAs. As a result, the Council can meet its own minimum housing needs anywhere in the Borough as long as that approach is considered to be sustainable and there is no need to base delivery of its own needs on HMAs.
- 2.14 Nonetheless, whilst HMA's no longer hold the same significance under the 2019 NPPF the principle of distributing growth to reflect the wider settlement and commuting patterns remains valid and the key issue of housing needs and distribution across boundaries still needs to be addressed and met effectively and sustainably. As such, a HMA could indicate that any unmet needs that may arise from neighbouring authorities within the PUSH West area, such as Southampton, should be met as close as possible to where those needs arise and in line with commuting and migration patterns and recognising sustainable transport choices.
- 2.15 We would therefore recommend that the Council does not look to distribute housing within the Borough strictly on the basis of separate HMAs (Options A and C) but on the basis of the principle of delivering sustainable patterns of development across the Borough as a whole with a single HMA (Option B). This would consider evidence on commuting patterns and migration used to identify HMAs but ensures the distribution of development and the spatial

strategy is not unduly constrained by using HMAs. In this context, it is fundamentally important that the Council gives due regard to the key role and influence of Southampton, as the main settlement in the area, in providing jobs, shopping and leisure opportunities for the southern part of Test Valley.

2.16 This would also have the benefit of simplifying the approach to plan making, reducing the time taken to prepare the Plan as the evidence base relating to housing and employment needs would no longer need to consider disaggregation. In terms of supply, removal of the disaggregation approach would also yield benefits in terms of greater flexibility of how the Council manages supply and reports on housing delivery both in terms of assessing five year housing land supply and also ensuring housing completions are in line with expectations set out in the Housing Delivery Test introduced through the NPPF.

2.17 Finally, with regard to housing distribution it will be important that the Council ensure that a wide variety of sites, both in terms of location and size, must be allocated. This will ensure that needs can be met consistently over the plan period and avoid a situation where delivery focuses on a small number of larger sites that deliver homes at the end of the plan period. The Council has recognised that the NPPF requires them to ensure that 10% of its housing requirement is delivered on identified sites of less than 1ha. It is important to stress that these must be identified in the plan or brownfield register and not include any element of small site windfall as these by definition are not identified sites.

**Question 2 - In determining HMAs how should wider relationships with settlements beyond the Borough's boundaries, be taken into account, including with Southampton, Salisbury and Winchester?**

2.18 As noted above, we consider that the Council should not look to distribute housing within the Borough on the basis of separate HMAs but on the basis of the principle of delivering sustainable patterns of development across the Borough with a single HMA. Whilst this is the case, it is essential that the strategy takes account of key drivers within the housing market areas, including commuting patterns both within the Borough and to key settlements in neighbouring authorities such as Winchester, Salisbury and Southampton. In this regard it is fundamentally important that the Council gives due regard to the key role and influence of Southampton, as the main settlement in the area, in providing jobs, shopping and leisure opportunities for the southern part of Test Valley. This would suggest a focus on delivery in the southern part of the Borough.

**Question 3 - Should an alternative approach to using parish boundaries be used for HMAs? If so, would this easily be identifiable and practical for monitoring purposes?**

2.19 As noted above, we consider that the Council should not look to distribute housing within the Borough on the basis of separate HMAs but on the basis of the principle of delivering sustainable patterns of development across the Borough with a single HMA.

## **Settlement Hierarchy**

**Question 4 - Should the number of steps of the settlement hierarchy be increased, for example by sub-dividing the 'rural villages' into two separate tiers?**

- 2.20 There are currently 39 settlements classified as rural villages within the current Local Plan. Within this there is some variation in the size and characteristics of these villages with varying levels of services and facilities. Their ability to accept new development will also vary based on their character and existing constraints. Whilst the Council will need to review and update its evidence to enable judgements to be made, it is considered that there may be merit in disaggregating this tier of the hierarchy into two levels to reflect the different ability of rural villages to support new growth. Nonetheless, in establishing a sustainable growth strategy it is considered that such settlements should only make a relatively small contribution to meeting housing the Borough's housing needs.

**Question 5 - How should we decide which settlements to include within each step of the settlement hierarchy?**

- 2.21 The Council will need to review and update its previous evidence in respect of the settlement hierarchy in order to ensure that the level of services and facilities available at each settlement remains up to date. The relative sustainability of settlements will then need to be determined. Nonetheless, subject to the comments above in respect of the rural villages it is considered that the settlement hierarchy otherwise remains logical and appropriate.
- 2.22 In particular, we would support the continued inclusion of Rownhams and Nursling as a Key Service Centre capable of supporting strategic allocations given the good level of service provision and the settlement's accessibility to a wider range of services and employment provision within the Southampton urban area by sustainable modes of travel.

**Question 6 - Should we consider groups of rural settlements together, where these are closely related to each other and/or share facilities and services?**

- 2.23 Where rural settlements have a close functional relationship and genuinely serve other nearby settlements or share facilities with others there may be merit in grouping these into functional clusters where this would support the development of sustainable rural communities. The Council would need to provide evidence to clearly justify any such approach as part of their settlement hierarchy.

**Question 7 - How should we treat rural settlements which are close to other larger settlements and can therefore also easily access their facilities and services?**

- 2.24 In seeking to establish sustainable patterns of development it is considered important that the Council gives due regard to the proximity of settlements to other larger settlements which can provide access to a wider range of services and facilities than the settlement itself. Commuting patterns and the availability of public transport services and connections also

need to be considered in this context. This is particularly important in the south of the Borough where the influence of neighbouring Southampton is significant.

- 2.25 In this regard, we would stress that this enhances the sustainability of Rownhams and Nursling for instance. Whilst the villages themselves have a good range of services and facilities, the proximity of the settlements to neighbouring Southampton and the availability of good public transport and cycle links means that residents can easily access a wider range of services, facilities and employment opportunities by means other than the car.

### **Settlement Boundaries (Questions 8-12)**

**Question 8 - In updating the settlement boundaries to reflect recent development which has been built and development with planning permission, should we also include new allocations?**

- 2.26 We consider that any settlement boundaries should include any recent developments and any development with planning permission. In addition, it will be important that settlement boundaries also include any allocations made in the new local plan.

**Question 9 - How should we define settlement boundaries? What types of land uses should be included, such as public open space?**

**Question 10 - Should the approach to using whole curtilages for defining settlement boundaries be retained, or should we take account of physical boundaries which extend beyond curtilages, or limit settlement boundaries to only parts of curtilages?**

**Question 11 - Should settlement boundaries be drawn more tightly or more loosely, perhaps reflecting which tier the settlement is within the settlement hierarchy?**

**Question 12 - Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment?**

- 2.27 In defining the settlement boundary we would suggest that the Council looks at a looser boundary, defining them on physical features which extend beyond the curtilage of buildings and include any elements of open space associated with that settlement. Such an approach may offer opportunities, especially in smaller settlements, for further development to support smaller developers as well as potentially delivering land to support those wanting to build their own home.
- 2.28 If the Council decide to maintain a tighter boundary to settlements, we recommend that a policy is included to provide some flexibility for development on the edge of settlements. This approach allows the Council to take a more flexible approach that is proportionate to the size and nature of the settlement without compromising the integrity of the Council's spatial strategy and settlement hierarchy. In particular, such an approach will better support the Council maintaining the vibrancy and vitality of its rural communities by delivering both market and affordable homes to meet the needs of such areas.

## **Self and Custom Build Housing (Questions 13-14)**

### **Question 13 - Should we have a specific policy for self-build homes?**

- 2.29 We support the provision of a specific policy for self-build homes setting out the Council's approach to such development. It is considered that this would be beneficial in encouraging such provision and ensuring that the Council's approach to this specialist form of housing is clear. However, in developing such a policy it is important that the Council carefully consider its approach to supporting those who wish to build their own homes.

### **Question 14 - Should we have a policy for large housing sites to include a proportion of serviced plots to be made available for sale to those seeking to build their own homes?**

- 2.30 Whilst we acknowledge it is important for local plans to provide support within policy to self and custom build housing, we do not consider that such policies should seek a proportion of large sites to provide plots for such homes. Firstly, the PPG is clear that when seeking to meet the demand for self-build plots Council's should engage with landowners to identify suitable sites for self and custom build housing. Requiring all large sites to provide plots takes no account of whether such sites are suitable or will provide the type of plots required by self-builders nor does it seek to engage landowners in the process. As such we consider blanket policies to be inconsistent with national policy. We would suggest that the more appropriate approach, and one that is consistent with national policy, is for the Council to be proactive in identifying suitable sites, including the Council's own land, that would be suitable for self-build plots and then engage with landowners with regard to their allocation for such development. Importantly such an approach may identify additional sites and as such provide a greater variety of development opportunity rather than just deliver units on a larger site in a different way.
- 2.31 Furthermore, the Council will need to ensure that its evidence is robust. Whilst the PPG recognises that the Self Build register will be a key piece of evidence in estimating the need for self-build plots it also notes that consideration will need to be given to the robustness of this data and what alternative sources of evidence is available. In addition, we are concerned that such registers are rarely revisited by local authorities and as such may not provide an accurate assessment of the demand for self-build homes. When a number of Councils have revisited their registers in order to confirm whether individuals wish to remain on the register, numbers have fallen significantly. This suggests that the majority of those that sign up to the registers in reality lack the commitment, time, and finances to take on a self-build project.
- 2.32 Finally, if the Council do include a requirement for self-build plots on some sites it is important that it includes a clause as to when such plots will be returned to the developer should they remain unsold. We would suggest that should plots allocated for self and custom build housing remain unsold after twelve months of marketing they should be returned to the developer to be built as market housing.