

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 6th February to noon on Tuesday 2nd 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

Once the form has been completed, please send to planningpolicy@testvalley.gov.uk below by **noon on Tuesday 2nd 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

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Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	<u>Mr</u>	First Name*	<u>Bryan</u>
Surname*	<u>Jezeph</u>		
Organisation* (If responding on behalf of an organisation)	<u>BJC Planning</u>		

Please provide your email address below:

Email Address*	<div></div>
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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:

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

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
<u>SEE ATTACHED</u>

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

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.

RESPONSE TO THE DRAFT TEST VALLEY Reg. 18 Stage 2

Prepared by Bryan S. Jezeph BA, DipTP, MRTPI, FRICS, FRSA

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RESPONSE TO THE DRAFT TEST VALLEY Reg. 18 Stage 2

1.0 INTRODUCTION

- 1.1 This paper sets out my comments on the Draft Local Plan. The response draws attention to the fundamental matters raised by the Plan. It is recognised that the issue of climate change must be addressed but the policies of the Plan fail to recognise the reality of situation.
- 1.2 There is also a fundamental flaw in the policies that cover housing supply. It is recognised by most people that we are not building enough homes. The Plan has not addressed the need to boost supply. Instead, the Plan is unnecessarily restrictive. The overall requirement is under estimated. The policies with regard to the rural areas are too restrictive.
- 1.3 These themes are pursued in this Response. The Policies are examined and, where appropriate, queries are raised.

2.0 ANALYSIS OF THE POLICIES

- 2.1 The Section entitled 'Challenges and Objectives' sets out the Policy. It states under the heading "Our Communities" that the objectives are to:-

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.

- 2.2 It is, of course, important to support the viability of local village centres but in many villages there is just one village shop. These shops need to be supported and the only way to do this is to increase the local population. Shops are closing such as the one on Kings Somborne. The decision to allocate land for 41 dwellings in the Neighbourhood Plan has come too late to save this vital store.
- 2.3 The support for shops and local services is established in the policies but they simply do not go far enough. This support is not followed through with action to assist all of the communities. The Policy states:-

This objective is seeking to sustain and where possible, strengthen the sustainability of our communities and ensure lasting benefits are provided by new development for our communities. Consultation responses are supportive of this objective. Increase in population can help to sustain the vibrancy of our rural communities through helping to keep existing facilities and services to meet daily needs. Meeting daily needs is achieved through access to key services and facilities such as a food store, place of worship, community hall or meeting place, recreation ground or park, a public house and a primary school.

- 2.4 The benefits are recognised and paragraph 2.34 states that the objective is to **strengthen the sustainability of our communities and ensure lasting benefits are provided by new development for our communities.**
- strengthen the sustainability of our communities and ensure lasting benefits are provided by new development for our communities.**
- 2.5 Only certain ‘communities’ are supported. Others are discounted. The rural areas are not treated equally. There is no help for many rural communities “to keep existing facilities and services” viable.
- 2.6 The Local Plan accepts that some of the rural areas have “limited access to public transport” but there are no proposals to rectify this.
- An efficient and integrated transport network is important to help deliver sustainable economic growth, reduce congestion, and to enable residents and visitors to enjoy good access to services. Test Valley is well placed in this regard, enjoying a good strategic road and rail network, access to local airports and ports and a wide range of local bus services. However, some of our rural areas, have limited access to public transport. Car ownership in the borough is higher than the UK average and most journeys in Test Valley are made by private car.**
- 2.7 It is not surprising that car ownership is higher than the UK average. The main road links between Andover and Romsey are good for the users of private cars but this is actually detrimental to the rural areas. There should be feeder links from the rural areas to the strategic road network. It seems that the Council has adopted a “wait and see” approach. It is not clear what this means. Is it to watch the gradual decline?
- It is anticipated that transport and movement will evolve in response to the challenges presented by climate change.The transport sector will change dramatically as we approach 2050.**
- 2.8 Paragraph 2.67 states that
- Facilitating access to public transport, enabling an increase in sustainable movements and use of low carbon transportation along with having large rural areas in the Borough, have been highlighted as important to our communities through consultation response. This presents significant challenges for the Local Plan 2040.**
- 2.9 Although the policy is to facilitate access to public transport, it seems to be postulated on the acceptance that this will fail. Paragraph 3.31 states that
- The level of public transport has been removed from the methodology reflecting the uncertainty over future rural bus provision.**
- 2.10 It is recognised that travel by car is dominant at the present time but this may not prevail. Fuel costs may make people review the benefits especially if there

is a viable alternative. Wiltshire County Council has implemented “a new type of bus service” called Wiltshire Connect. It states that

Wiltshire Connect.

- 2.11 Wiltshire County Council has implemented a ‘bespoke service’.

Unlike a typical bus service, our Wiltshire Connect vehicles operate on a pre-bookable, on-demand basis, allowing you to travel between any designated pick up and drop off point within each zone.

- 2.12 It also states that

our smart technology will match up your journey with any other passengers travelling in the same direction.

- 2.13 The population is ageing and older people will be isolated in the rural areas unless provision is made to meet their needs. The use of digital technology could assist with many of these issues.

- 2.14 Paragraph 2.68 states that

Focusing development in the most sustainable locations and using the 20-minute neighbourhood principles can help to reduce the need for travel and therefore its impacts.

- 2.15 It is evident that this principle would preclude most development in the rural areas. It is even difficult to achieve in urban areas. Its main application is for new housing allocations.

- 2.16 The National Planning Policy Framework provides specific guidance on sustainability, it states that:-

To ensure the overarching sustainable objectives are at the heart of Local Plans and decision making on planning applications, the National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development. As set out in the NPPF, sustainable development is meeting the needs of the present without compromising the ability of future generations to meet our own needs and has three overarching objectives. To deliver this, we must balance these objectives; economic, social and environment, which can be challenging.

- 2.17 The Local Plan proposes to ignore this guidance. It states in paragraph 3.5 that:-

Taken as a whole, the spatial strategy and the plan’s policies will balance the delivery of the three sustainability objectives and how we positively deliver the presumption in favour of sustainable development for our communities. Reflecting this, we are continuing to not propose to have a policy in this Local Plan 2040 that sets out the presumption in favour of sustainable development.

- 2.18 The Council has rejected this high level guidance and it proposes to **not** have a policy in this Local Plan 2040 that sets out the presumption in favour of sustainable development. This seems to be another attempt to restrict development in the rural areas.

- 2.19 Paragraph 3.13 states that

The focus is to support an appropriate level of development at our largest range of sustainable settlements where there are key facilities.

- 2.20 The corollary of this statement is that other settlement will have less or no support.

Rural Facilities Survey

- 2.21 The Council has undertaken a survey of facilities. It states that

Rural Facilities Survey was undertaken and sent to all Parish Councils to inform the Regulation 18 Stage 1 consultation document. This Survey focused on the *rural settlements* in the Borough,

- 2.22 It states that

This strategy will support these rural settlements to develop in a sustainable manner through enabling rural communities to deliver their own needs and priorities. enable our rural communities to address the specific challenges they face in terms of housing supply and affordability.

- 2.23 However, this is only in relation to certain settlements. The revision states:-

It gathered information about the existing services and facilities e.g. number of facilities such as a food store, primary school and level of bus service, within the rural settlements, in order to assess their sustainability and compare the facilities of different settlements. This has been reviewed to keep the information on facilities and services up to date.

- 2.24 It still refers to bus services which the Plan no longer includes in the assessment.

In rural areas, planning policies and decisions should be responsive to local circumstances, support housing developments that reflect local needs and identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one settlement may support services in a settlement nearby.

- 2.25 It is a matter of fact that new housing development is the fundamental requirement. The Policy is supported but it is not clear how the housing developments will be assessed. The Local Plan acknowledged this in paragraph 3.21. The NPPF states that:-

National guidance recognises that people living in rural areas face challenges in terms of housing supply and affordability and new housing can be important for the broader sustainability of rural communities.

- 2.26 The Local Plan qualifies this objective by reference to other policies. It states in paragraph 3.23 that

Although the Settlement Hierarchy is a key policy to deliver the spatial strategy, it sits alongside a number of other policies which collectively will help deliver the spatial strategy.

- 2.27 It identifies 'key facilities'. It states in paragraph 3.25 that:-

six 'key facilities' to meet the day to day, basic needs of our communities along with the 'good' level of public transport service to be in 'Tier 3'. These 'key facilities' were food store, public house, primary school, outdoor sports facility, community or village Hall; and a place of worship. If a settlement did not have these facilities, it was to be in 'Tier 4'.

- 2.28 The Local Plan recognises that:

the distinction between rural settlements in Tiers 3 and 4 was marginal in many cases and not sufficiently distinct to justify a difference in tier classification. The difference in only one 'key facility' resulted in a Tier 3 village becoming Tier 4.

- 2.29 In paragraph 3.43, it states that

It is proposed that only settlements in Tiers 1-3 of the Settlement Hierarchy will have a settlement boundary which are shown on the Policies Map. There are nine settlements in Settlement Hierarchy Tier 4

- 2.30 Although the Plan recognises that the difference is marginal, it still removes nine settlements from the hierarchy. It down grades them as simply being countryside with the consequence that housing development is restricted.

- 2.31 In paragraph 3.91, it states that:-

The outcomes of the assessment for the active designated areas that have not chosen to allocate housing, provide a minimum requirement of 10 new homes over the plan period. This figure will ensure that affordable housing can be provided in these rural areas. This minimum figure should be delivered through the Neighbourhood Plan and supplemented with local evidence, such as a housing needs survey, to ensure that the right type and size of new homes are delivered in the designated areas. There are a few active designated areas where no housing requirement is proposed reflecting the outcomes of the assessment and the scale and constraints that exist at these areas.

- 2.32 Test Valley has an ageing population with 21% of the resident population estimated to be aged 65 and over compared to the national average of 18%. This increases pressure on health and social care infrastructure. The Policy states:-

Encourage active lifestyles and enhance health and wellbeing, by providing opportunities for recreational, and community activities, through the provision of accessible open spaces, access to the countryside, sports, leisure and other community facilities and services.

- 2.33 There are no facilities in the wider rural areas for tourists.

- 2.34 In paragraph 3.91, it states that:-

There are affordability issues and housing needs vary in the north and south of the borough but are common within our rural area across the borough. Providing a range of housing to meet the needs of our communities is a key challenge for the Local Plan 2040. The Local Plan 2040 will aim to support communities to bring forward locally-driven schemes that provide the range of homes needed to meet needs.

- 2.35 In paragraph 5.367, it states that:-

The policy aims to facilitate the delivery of affordable housing and other uses on sites in the countryside from proposals that are community led. This may also include market housing, other community facilities and infrastructure outside of settlement boundaries. The policy supports all the Borough's communities in bringing forward development, but which can potentially help the sustainability of rural communities. The scope and scale of the proposal should therefore reflect local need.

- 2.36 This ignores the fact that many residents are opposed to more affordable housing in the villages. In paragraph 5.368, it states that:-

The policy is important in providing for an additional positive framework to neighbourhood planning mechanisms in the Localism Act 2011 that communities may wish to consider. This Act recognises that communities should have opportunities to take responsibility for promoting residential development in order to help support local services and facilities.

- 2.37 In paragraph 5.369, it states that:-

The issue of establishing or maintaining facilities, such as halls or shops, or meeting other community needs, is a challenge to many communities especially rural communities. Therefore, the policy can be applied to both those settlements identified in the hierarchy and smaller undefined settlements.

2.38 In paragraph 5.370, it states that:-

This policy allows for an alternative formal planning mechanism to deliver development that is either led by the community, or has significant community involvement and support, without the need to undertake a Neighbourhood Plan or Neighbourhood Development Order (NDO), where proposals are supported by appropriate evidence. Communities may therefore seek to bring forward housing, employment,

2.39 Who will use this mechanism? In paragraph 5.382, it states that:-

NPPF para.82 makes provision for local plan policy to support rural exception schemes that provide affordable housing to meet identified housing needs. This also indicates that consideration should be given to whether to local planning authorities should allow for some market housing on rural exception sites which could assist in facilitating such sites coming forward.

Neighbourhood Plans

2.40 Neighbourhood Plans can override the countryside restrictions. Paragraph 3.80 states that:-

Neighbourhood Plans are one of the tools to deliver housing in rural areas. They provide a tool for communities to have their say in the future of the places where they live and work. They become part of the Development Plan and have legal weight in determining planning applications.

2.41 This is a 'dark art'. Paragraph 3.83 states that:-

By their nature Neighbourhood Plans are 'non-strategic' but nevertheless can contribute to achieving the strategic objective of providing new homes. Neighbourhood plans should not promote less development than set out in the Local Plan but can promote more development.

2.40 Paragraph 3.85 states that:-

The Charlton and King's Somborne plans have allocated new homes based on the needs in their area which was evidenced through Local Housing Needs Survey. This evidence has enabled them to have policies on the number of bedrooms that new homes should have, so that the right type of homes are delivered. They also have policies on the design of new development and Local Green Space Designations to protect important open spaces.

2.41 Paragraph 3.86 states that:-

National policy places a duty on the council to provide a housing requirement for each designated neighbourhood area which reflects the

overall strategy for the pattern and scale of development for the area and any relevant allocations. Non-strategic requirements for each active designated area are therefore set out in Policy SS5.

- 2.42 It is evident that the formula for housing provision is not made in the Plan but it is determined independently. It is not clear how this fits with the overall housing strategy.
- 2.43 Even where Neighbourhood Plans are proposed the development in accordance with the 'wishes' of the residents is uncertain. In King's Somborne, an appeal was allowed prior to the Neighbourhood Plan being 'made' for 18 dwellings on a site to which there was considerable objection. It was allowed on the grounds of a District wide housing shortfall. The Plan proposed 41 dwellings. As a consequence, the residents could only examine the residual figure of 23 dwellings.
- 2.44 The King's Somborne Neighbourhood Plan 2020 to 2029 was 'made' following the positive referendum on 9 November 2023. Although there was a majority in favour (90.11%), but the turnout was just 27.27% on an electorate of 1600. This is a turnout that President Putin would have regarded as a disaster.
- 2.45 The Parish is relatively well endowed with facilities (paragraph 3.7.6). This includes:-
- King Somborne C of E Primary School which has an annual admissions number of 20 pupils and has 4 classes.
 - There is a thriving pre-school located in the newly installed community building.
 - 4 public / village halls, including King Somborne Village Hall which can hold up to 200 people and the Somborne Working-men's club.
 - St Peter & St Paul's Church.
 - Two public houses with one in the centre of King Somborne and the other in neighbouring Horsebridge.
 - Small number of shops including Cross Stores and Post Office.
 - Outdoor sports facilities are available with a football pitch, cricket pitch, MUGA.

- 2.46 It states that:-

The Plan forms part of the Development Plan for the parish and will be used to guide planning decisions in King's Somborne.

- 2.47 A planning application for 14 dwellings on one of the favoured sites has generated objections from local residents.

- 2.48 The decision to allocate more housing came too late to save the village store (Cross Stores) which closed recently.

Examples of Villages where development has been restricted without justification.

BRAISHFIELD

- 2.49 A Settlement Boundary has been retained in the Local Plan for the northern part of the village. However, the Settlement Boundary has been removed for the southern part of the village. There is existing development centred on the farm buildings. Some of the buildings have been converted to dwellings leaving one very large building which is now used primarily as a workshop for the repair and maintenance of agricultural machinery.
- 2.50 The adjoining farmland is used for beef cattle rearing. The future of this use is marginal and there is government encouragement to cease this use. The land has limited alternative agricultural uses. The owners have proposed that part of this site should be developed for housing while the greater part should be used for SANGs.
- 2.51 With regard to a housing development the site is in a sustainable location with many facilities within easy walking and cycling distance of many facilities. The nearest school, Braishfield Primary School, is situated in the northern part of the village just 750 metres away (0.5 miles). There is another Primary School (Cupernham Junior School, 2.7 km (1.7 Miles) away. Romsey Academy Senior School is in Romsey Town 5km (3.1 miles) away.
- 2.52 There are shops relatively closeby. The 'Lemon and Juice' store on Cupernham Lane (SO51 7JF) is 2.6 km (1.6 miles) distant while there is a Coop Store (SO51 0BX) on Abbottswood Common Road 1.8 km (1.1 miles) distant. Romsey Town Centre (The Market Place (SO51 8NB)) is 5.4 km (3.4 miles) away.
- 2.53 It is significant that the site at Fairbournes Farm is just 10 miles from Winchester City. There are alternative routes by car via Ampfield and Hursley or via Kings Somborne to Winchester. A very large number of people commute from villages in the Test Valley to Winchester. Working from Home means that many people can enjoy living in the countryside for most of the week. If people have the choice many would prefer to live in the countryside rather than the Towns of Romsey and Andover.

WEST TYTHERLEY

- 2.54 The Norman Court Estate, which owns and manages several farms including land in West Tytherley. The development of land close the houses in the settlement for a modest housing scheme and some employment uses would greatly assist the village. The site is relatively well screened from the road and additional planting could ensure that the impact upon the character of the area is minimal. This could facilitate limited development without detriment to the character of the settlement.

3.0 CONCLUSION

- 3.1 It is difficult to interpret the confusing set of policies that pull in both direction some favouring development but others opposing development. It is also very fine line. Even the Plan recognises that the decisions are marginal.
- 3.2 The treatment of the wider rural villages ignores the fact that there will be delivery vehicles of all sorts delivering food supplies, clothes etc.
- 3.3 Bus services such as Wiltshire Connect should be considered for the District which faces very similar issues.
- 3.4 Many people commute from the southern villages to Winchester for services and to travel to London.
- 3.5 Maximising development in Andover and Romsey means that the choice of housing is restricted to the volume house builders whose products are much the same. The opportunity for choice is severely limited. This pushes people to look to the villages for properties with a choice of designs and large gardens.
- 3.6 The wider rural areas will not be able to offer facilities for tourists. A local shop would provide refreshments and toilets facilities.