

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

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/localplan2040

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Mrs	First Name*	Alexandra
Surname*	Webb		
Organisation* (If responding on behalf of an organisation)	Southern Planning Practice Ltd		

Please provide your email address below:

Email Address*	
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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:

Mr Peter Hills

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
<p>Please see submitted representations.</p>

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
	<p>Please see submitted representations.</p>

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.

Representations on the Draft Test Valley Borough Local Plan 2040 Regulation 18 Stage 2

These representations have been prepared by Southern Planning Practice Ltd on behalf of Mr P Hills who owns 'The Ridings' in Weyhill in response to the current consultation on the Draft Local Plan 2040 (hereinafter referred to as the DLP). The land owned by Mr Hills is considered suitable for allocation in the DLP as an alternative to those sites allocated for development, subject of the current public consultation.

We can confirm it is available, suitable, achievable and deliverable and would help to meet Test Valley's housing need in a sustainable way whilst also providing benefits to the local community and the Borough's economy. **We therefore object** to the revised SPB for Broughton (South) as shown in the draft policies maps.

Chapter 3: Spatial Strategy

Spatial Strategy Policy 1 (SSI); Settlement Hierarchy

We support the inclusion of Weyhill as a Tier 3 settlement however, we would suggest that the settlements within this tier should be ranked in detail as we consider Weyhill to be more sustainable than many others in this tier. Such ranking would assist in the decision-making process to ensure proportionate growth is being directed to the most sustainable settlements in the Borough. Growth in such settlements is strongly encouraged, particularly if the capacity of the larger sites in Tiers 1 & 2 are reduced. A reduction in capacity on the larger sites may be likely due to the recent introduction of Biodiversity Net Gain (BNG).

We note that in the settlement hierarchy Tier 3 settlements are to be considered 'non-strategic' as there is no provision made for strategic allocations within these settlements. However, we encourage the Council to support proportionate growth in smaller settlements and sustainable rural areas, which may be beyond the existing settlement boundary, to meet local needs and to support the District's rural economy. Further, Weyhill which is considered to be a Tier 3 settlement, is very well related, both functional and physically, to Andover, a Tier 1 settlement, and as such, we believe that settlement should be ranked as a 'higher' Tier 3 settlement which can accommodate proportional growth in sustainable locations. One such location where new growth could be delivered is the land at 'The Ridings' which is a partial brownfield site in a sustainable and accessible location.

In order to both provide and maintain a robust housing land supply, in addition to focusing growth in the two principal settlements of the Borough, the Council should look to all tier settlements in the hierarchy to deliver homes through a range of small, medium and strategic sites.

The land at 'The Ridings' presents an opportunity for Test Valley to allocate a further small-medium scale partial brownfield site in the emerging Local Plan. Paragraph 70 of the NPPF recognises the important contribution small and medium sized sites can make to meeting the housing requirement of an area as they are often built out relatively quickly. By allocating a range of sites, the Council will be able to maintain a stable housing land supply enabling the

delivery of homes throughout the plan period to meet the identified local requirements and to ensure Test Valley is not vulnerable to unsustainable, speculative development. Further, with the nature of the site being partially brownfield, it is considered that such a site should be prioritised for development in accordance with the Government's 'brownfield first' approach to new development.

Spatial Strategy Policy 4 (SS4) Rural Housing Requirement

The housing requirements for rural areas are out under this draft policy. The rural housing requirement for both Northern Test Valley (NTV) of 260 homes and Southern Test Valley (STV) of 282 homes, totals 542 homes.

Policy 5 (SS5): Neighbourhood Development Plan Housing Requirements

This draft policy sets out how some of the rural housing requirement is to be delivered through the provisions as set out under made Neighbourhood Development Plans (NDPs). However, such provisions are relatively small scale (one neighbourhood proving 40 dwellings and the others only providing 10-20 dwellings). The total requirement is 40 for NTV and 70 for STV. This leaves a shortfall of 220 homes for NTV and of 212 homes for STV.

The minimum housing requirement for the Neighbourhood Development Plan area of Amport (which includes Weyhill West and East Cholderton) is only 10. Given the remaining shortfall, it should be easier to facilitate all types of new housing development in such neighbourhoods, where the need and shortfall of rural housing has clearly already been identified.

Policy 6 (SS6): Meeting the Housing Requirement

Whilst we can see the benefit in delivering housing through the larger strategic allocations, we are concerned that the spatial strategy contained in the DLP, particularly policy 6 (SS6), over relies on the delivery of such site without recognising the important contribution small and medium sites can make to meeting the housing requirement and how they can be built out relatively quickly compared to larger sites, as encouraged by Paragraph 70 of the NPPF. We believe that the alternative options do not appear to have been thoroughly considered.

Northern Policies Maps

Inset Map 56 – Weyhill (West)

Further expansion of the SPB for Weyhill (West) to include Strategy Housing and Employment Land Availability Assessment 'SHELAA' site 'The Ridings' (site reference 83) would be encouraged.

Our client owns 'The Ridings' which is available and suitable to provide residential development of up to 20 dwellings. The site was submitted in response to the 2022 call for sites and is included in the 2024 SHEELA. It is also being put forward as an 'application of local interest' in the preparation of the Amport Neighbourhood Plan.

Land at 'The Ridings' is located in Weyhill (West), Map 56 of the Draft Local Plan and the SPB bounds the north and north west corner but does not include the site. However, we consider that as there is residential development to the north and west of the site, the settlement boundary for Weyhill should be extended to include the site as it would result in a natural and logical rounding off of the SPB. It could provide an opportunity to deliver approximately 20 dwellings which would maintain the current density of housing within the immediate surroundings.

The site is accessible to local services and there is an existing access point from Dauntsey Lane via 'The Ridings' residential property.

There are no known environmental, heritage or landscape designations that apply to the site itself. The site is located within flood zone 1 as confirmed by the Environment Agency which means there is a very low risk of flooding from both rivers and the sea. The site is therefore relatively unconstrained and there would be no constraints which would prevent it from being developed for new homes.

We would encourage the Council to further review settlement boundaries as part of the next stage of the Local Plan to ensure that the most sustainable sites are being included within the settlement boundaries of the existing settlements.

Summary

It is considered that the proposed spatial strategy relies too heavily on the provision of larger strategic allocations for housing provision which the Council (as well as the site promoters) have acknowledged are unlikely to deliver new homes until later in the plan period, when the need is now. The total number of homes that could be delivered, through strategic allocations, should now be adjusted, to reflect the mandatory requirement for BNG. Particularly for sites that will provide on-site BNG.

Plans need to be prepared positively in accordance with paragraph 16 of the NPPF and at present, I do not believe this is the case with the TVBC DLP 2040 due to the over reliance on strategic allocations and insufficient consideration to areas designated as neighbourhood areas but without a made NDP.

The spatial strategy could be improved by making a number of smaller site allocations in accordance with paragraph 70 of the NPPF which would provide a more flexible and responsive housing land supply and deliver new homes earlier in the plan period to meet the current national need for new housing.

In accordance with the definition of 'deliverable' within the NPPF (2023), 'The Ridings' is available for development now, it is a suitable and sustainable location for future residential development and it is achievable with a realistic prospect that housing will be delivered on site within five years following its allocation. It would provide many benefits to Weyhill and the surrounding area, including:

- Contribution of a mix of size, type and tenure of home, including much needed affordable housing, to Test Valley's housing land supply;
- Contribution of an additional working population to the area;
- Direct and indirect employment through the provision of new homes.

In light of the above, and the details provided in these representations, it is requested that the Council review their allocated sites together with their housing requirement and look to allocate additional small and medium sites, such as 'The Ridings', to meet Test Valley's housing need over the plan period and beyond. The proposed SPB for Weyhill (West) should therefore be amended to include this site.

We trust the information contained within these representations is sufficient, however should you require any further information please do contact us.

SPP
March 2024