

Planning Policy

From: John Moon <[redacted]@maadaban.com>
Sent: 26 August 2018 16:16
To: Planning Policy
Subject: Issues and Options response
Attachments: CPRE covering letter and response TVBC Issues and Options.docx

Hello,

Please find attached a response on behalf of CPRE Test Valley.

Best regards,

John Moon (Acting Chairman, CPRE Test Valley)



**CPRE Hampshire
Test Valley District Group**

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27th August 2018

TVBC Issues and Options for the next Local Plan

Thank you for providing an interesting discussion paper, our responses to the questions asked are on the enclosed sheets.

Yours sincerely

Dr J R Moon
Acting Chair CPRE
Test Valley District Group

TVBC Issues & Options, response by CPRE Test Valley

Q1: What is good about living and/or working in Test Valley?

Pleasant countryside and landscape give excellent leisure opportunities; generally roads are not too choked with traffic (although this is getting worse).

Q2: What could be improved about living and/or working in Test Valley?

TVBC should drop their long-term aim (and practice) for aggressive expansion of Andover and Romsey beyond that necessary to satisfy government-imposed housing targets.

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

(a) Try to accommodate housing requirements with as little impact on the environment, landscape and quality of life as possible. (b) Try to match housing provision with real needs of individuals and communities, rather than developers' notions of what will be most profitable. (c) Try to reduce the number of HGVs on non-trunk roads.

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

TVBC has little option but to comply with the standard methodology. The revised NPPF states (para. 60) that the standard methodology should be used unless there are exceptional circumstances justifying an alternative approach. It is difficult to see that there are any circumstances in Test Valley that are exceptional enough to convince a planning inquiry inspector.

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 housing target that results from the standard method will imply a significant in-migration of people into the borough over and above that already implied in the ONS household projections (which, in turn, are based on population predictions that include past migration trends). Note that the standard OAN calculation results in an approximate 40% increase in the number of dwellings compared with the ONS projections of the number of households, depending on the time period considered (nb. new ONS household projections are due September 2018). Thus the potential for significant economic growth is already built into the housing figures resulting from the standard methodology.

There is no need for any additional housing for this factor. The adopted Local Plan used estimates of future employment, and consequent need for more people, to considerably boost the housing numbers above ONS projections, but it is futile to make such projections at the current time because of (a) the fall in migration from other parts of the EU since the referendum, and (b) the considerable economic uncertainties caused by Brexit.

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

It seems broadly right in that it reflects the reality of the situation that many residents of Southern Test Valley work in the Southampton area. However, the precise boundary seems to be a relic of old county structure plans, rather than on recent analysis of the factors that define a HMA. If HMAs matter, then the analysis should be more up to date.

Where should the growth go?

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

CPRE supports an approach based on the identification of major development areas adjacent to existing urban areas which

- make use of existing infrastructure;
- are coordinated with complementary infrastructure investment;
- maximise the potential of brownfield sites;
- promote public transport.

Development in rural communities should be determined by the needs of the local communities.

Q8 Do you have any comments on the approaches suggested for distributing development?

5.19 to 5.20 Community led distribution

The proposal for parishes to request a housing requirement to be included in Neighbourhood Plans is supported (subject to the residual borough-wide requirement not being distributed to parishes). Parishes should be encouraged to consider whether some extra development is necessary and desirable to ensure the long-term viability of villages and their shops, schools, churches, pubs, clubs, societies etc.

Viable village communities with a strong sense of identity are likely to be proactive in many different social and economic areas such as energy self-sufficiency, community care.

5.21 to 5.23 Proportionate distribution to parishes

The future of rural villages needs to be considered from the point of view of the social and economic health of the villages themselves and the amount, type and location of development that is needed to maintain a viable community with its great strengths of social cohesion. Planning policy should not view villages primarily as a potential repository for meeting housing targets out of scale with the needs of the village.

Proportionate distribution would result in distribution unrelated to local need and potentially harmful to the character and identity of many villages. This method would conflict with national policy requiring development to be distributed in a way that reduces the need to travel. Public transport is virtually non-existent in many parishes and development will increase car usage.

The opposition that individual proposals under this option would generate together with the relatively small size of each application means the rate of delivery would be slow.

5.24 Local Plan Allocations

CPRE supports a policy of major development areas as extensions of existing urban areas in which optimum use is made of infrastructure and services investment and public transport is encouraged. Such a method is more sustainable than a policy of dispersal.

5.25 New Village

This might be a viable option in some locations in Test Valley but no new village should even be considered without long term robust sustainable transport links and a reliable estimate of job creation in the travel to work area.

Q9 How should the settlement boundaries be defined

Settlement boundaries should continue to be defined so as to clearly demarcate the boundaries of built up areas and planned extensions to them and areas intended to remain as countryside. This will help to give clarity to developers, infrastructure providers and the public. Boundaries should coincide with physical features where possible.

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

Yes, Test Valley has a considerable number of people in housing need and 40% appears to be a deliverable target. So TVBC should persist with it. Affordable should be tightly defined as <80% of market price and protected from resale into the open market.

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

This trigger should be as low as is permitted by national planning policies. Note that the revised NPPF (para. 63) allows for a lower threshold in rural areas and this should be applied since rural new-build properties are an attractive proposition for a developer.

Q12: Should we allow market housing on rural affordable exception sites?

This could help finance the affordable housing, but we suggest it should only be considered if the market housing is (a) starter homes, or (b) small retirement homes enabling elderly people to downsize. Allowing unrestricted types of market housing would inflate the price that landowners expect from their land and thereby increase the cost of providing the affordable housing; it would also not benefit the village concerned. The borough-wide supply of affordable homes might also be boosted if the local connection criteria were relaxed.

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?

TVBC should intervene here and specify the mix and type of housing. The unconstrained market has produced the affordability gap which is admitted in para. 5.31 of the consultation document and which the standard OAN methodology seeks to close. Left to its own devices, the private market prefers to serve a high-income clientele so, to reduce average house prices in the borough, TVBC needs to be more prescriptive about what is built. Looking ahead there is another incentive: If the house price to income ratio falls in Test Valley, then next time around the borough will be faced with a smaller uplift to the ONS projections which would reduce the development pressures on the borough and help preserve its character, landscape and environment.

An alternative would be to require that developers demonstrate how their proposed housing mix will meet the needs of the borough, with special reference to the mix of households indicated by the ONS household projections and the housing needs register.

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

TVBC should commit to defining a density for each substantial new development. The last thing Test Valley requires is sprawling suburbs of low-density housing. It should recognise that higher-density developments are better in terms of transport needs and social cohesion.

Q26: Should we allocate more land to enable more choice and flexibility to the market?

No, adequate land is already provided. However, TVBC should encourage employment providing high-quality jobs to rebalance the economy of Andover (in particular) and hopefully reduce the need to travel outside of the borough to get a quality job.

Q28: What provisions or controls should be made relating to people working from home?

As a rule, home working should be encouraged as it reduces traffic on the roads and also a higher number of daytime residents in towns or villages helps support their shops etc. However, the policy should prohibit home-based businesses that attract, or require, regular vehicular movements (e.g. for deliveries, collections, or conveying additional workers).

Q31: What should be included in any tourism policy in the next local plan?

The value of tourism (see 6.19) to the economy should be recognised in planning policy and it should be acknowledged that tourists come to see heritage assets, attractive villages and attractive landscapes. They do not come to see sprawling suburban estates or to find warehouse developments spewing HGVs onto local roads. A tourism policy should discriminate against development that would be harmful to the tourism economy. The impact of unrestricted tourism/recreation on sensitive sites (e.g. Chilbolton Common, Stockbridge Common Marsh) should be carefully monitored and help given to local parishes to manage and disperse this.

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?

CPRE believes that the principle of Local Gaps should be retained so as to protect the physical and visual separation of settlements where this is necessary to avoid coalescence of urban areas with surrounding villages and consequent loss of identity. It should be seen as an integral part of settlement policy.

A Local Gap policy should protect against development that would individually or cumulatively erode the integrity of the gap and which would not necessarily be prevented by countryside policies or those concerned with landscape character. Specific boundaries should be defined for Local Gaps. To rely on a general policy would be to introduce uncertainty and invite argument in relation to individual development proposals.

CPRE green belt policy for the south of the Borough should be supported, see:
<http://www.cprehampshire.org.uk/campaigns/green-belt-for-south-hampshire?tmpl=component&print=1>

Q35: Should the next Local Plan continue to promote water efficiency from new developments?

Yes, This is essential; water supply is a real problem in Test Valley with over-extraction causing environmental problems. There is an uncertain link between water resource and planning. Developers should be strongly incentivised to install water saving and owners similarly incentivised to retain them. The water requirements of new developments should be regarded as a planning constraint where the water companies advise.

Q36: Should we identify suitable sites for renewable energy, including onshore wind, in the Local Plan?

No, individual applications should be treated on their merits.

Q37: See Q36

Q38: Should the Local Plan encourage energy efficiency when constructing new development.

Certainly. Building regs. should be followed to their most stringent level.

Q39 How can we improve design quality within the Borough.

It would create a better looking environment if the surroundings and setting were more actively studied before design decisions are made on a particular development. New developments should relate to the topography as well as nearby building design. Landscaping should be implemented where approved. Tree planting should be seen as essential to protect soils and reduce flood risk.

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?

Open space is one of the design criteria and should be provided where needed for current and future needs.

Q41: Should we continue to set a per dwelling or per hectare standard for recreational open space provision on residential developments Or Should the Council require the provision of recreational open space on residential developments to be based on the needs set out in the Playing Pitch strategy

CPRE Test Valley would prefer the former as it relates to that particular development and is more likely to be local to it.

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

Ideally no protected land should be affected by development. Alternative land rarely replaces the precise biodiversity of land affected. We are not clear what “specifically allocated” means in this context.

Q43 Is there anything additional which the Council should be taking account of (Heritage)

We support active consideration of our tree and plant heritage both on land and in the rivers. This should rate as highly as the built and archaeological heritage. (See 7.29 Habitats function best when they are well connected to each other). Fragmentation ensures destruction.

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

Transport seems to us to be a prime concern when any development is considered at the planning stage. We do not think that this is happening.

- Positioning the bus services away from the train station does not make sense.
- Prioritise the village bus routes with providers, adjusting timetables, numbers of services and destinations with travel needs. Encouraging developments in villages must include this provision. Do not expect people to use poor services.
- Extend the digital network to the rural services so times are displayed at the bus stops or via an app. So people are encouraged to use the service.
- Work with the public transport providers to link the different transport networks and coordinate timetables (e.g. bus and train times) to integrate the networks.
- Invest in continuous safe cycle networks and remove some of the unnecessary obstructions for cyclists that exist in urban estates (sleeping policemen and thick rumble strips with no gap for cycles; unnecessary steel barriers).
- Ensure that providers give a safe reliable comfortable clean service.
- Centralise retail - shoppers cannot walk to out of town shops

Q45: How do you think that the Council should be making provision for parking in new developments?

Spaces must be carefully related to and within sight of the dwelling (8.12). Most households need more than one car so lower densities are inevitable. Make good use of the space with trees.

Q46: Do you agree with the Council's current approach or are there changes you would like to see made?

Assuming this still relates to parking. The issues which have arisen with parking on the new estates in Andover speak for themselves

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