

## Planning Policy

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**From:** steve lees <  
**Sent:** 03 September 2018 09:19  
**To:** Planning Policy  
**Subject:** issues and options consultation  
**Attachments:** P20.7.1 180816 issuesand optionsreponse.docx

Good morning

Please find attached a response on behalf of Ratlake Farm leisure Ltd

**Steve Lees**  
**Planning Consultant**

180816



**Response To Test Valley Borough Council Issues  
And Options Consultation For The Next Local Plan  
On Behalf Of Ratlake Farm Leisure Limited.**

**Steve Lees MRTPI**

**September 2018**

## Summary

The opportunity to comment on the Issues and Options Consultation document at an early stage of the review of the adopted local plan is welcomed.

The provision of housing to meet the housing needs of the borough is a key task of the Council as the local planning authority. It is important that it identifies the right number of homes needed, how and where they will be located and that they will be delivered within the local plan period.

The National Planning Policy Framework supports the provision of small and medium sites for housing and the next Local Plan will need to respond to that requirement.

## 1.Introduction

1.1 The purpose of this response is to set out the initial views of Ratlake Farm Leisure Ltd on the content of the Issues and Options Consultation published by Test Valley Borough Council in July 2018. It may wish to supplement the response in the light of changes in national planning guidance, relevant case law and the local planning context

1.2 Should you need to contact me; e-mail. \_\_\_\_\_ job no

## 2.Background

2.1 The company is a local business with land interests in the Borough.

## 3.Response

3.1 This response focusses on some of the housing issues highlighted in the Living in Test Valley section of the consultation document and sets out comments in respect of a number of the questions posed.

3.2 The company agrees with paragraph 5.1 which states that providing the right number of homes in the right location is one of the most important challenges faced by a local planning authority. It also agrees that there are serious implications for the residents of the borough if enough houses to meet their housing needs are not provided.

Q4 housing requirement to be consistent with the Government's approach

3.3 The Company considers that the next local plan's housing policies should be based on the Government's standard methodology as there are no exceptional circumstances to justify an alternative approach.

Q5 increase housing requirement to support economic growth

3.4 The question only refers to the local plan increasing its housing requirement to help support economic growth. The relevant national guidance does not limit the provision of additional housing over and above that derived from the standard methodology to meet economic growth. In the

context of paragraph 5.3 of the document the Council should consider an approach to housing provision which influences the prices of homes within the borough. In arriving at a proposed figure the Council will also need to take into account the Duty to Cooperate, particularly in respect of southern Test Valley. A number of adjoining authorities who fall within the same housing market area may not meet their own needs, eg New Forest District Council , New Forest National Park Authority, Southampton City Council.

#### Q6 HMA boundaries

3.5 In paragraph 5.6 the Council states that the Borough is covered by two housing market areas(HMA). It is not clear on what evidence that view has been based and it is therefore difficult to provide an informed response to the question. The Council's approach appears to be based on the assumption that the southern part of the Borough is within the south Hampshire SHMA with the rest of the Borough forming its own HMA. The former is based on the PUSH boundary rather than an analysis of the various factors which inform the extent of a HMA. However, the commuting patterns presented in Figure 11 do suggest that there is a strong link with south Hampshire ie approximately 43 per cent of all out-commuting and 46 per cent of in commuting is to and from south Hampshire. Whilst the boundary of the HMA may need to be reviewed it is clear that the southern-most parishes are very much a part of south Hampshire.

#### Q8 distribution of development

3.6 With respect to the options for distributing new housing development the Company considers that whatever approach is selected it should have as its focus meeting the needs of residents, the delivery of the requirement identified in a form that contributes to the achievement of sustainable development and one that ensures a continuous five year supply of housing land.

3.7 It is likely that an approach which has elements of the options highlighted would most likely deliver the new housing needed rather than reliance on one or two. Given the challenges of delivering new homes the Company would see considerable merit in the Council taking the lead and; identify the overall requirement, the quantum and broad locations where the requirement would be met with the specific allocations being identified either within the local plan or subsequent development plan documents prepared by it. Local communities should have an option to allocate sites to meet their share of the housing requirement through a neighbourhood plan.

3.8 To ensure that the borough's housing requirement is met there should be a fall-back position that in the event that a neighbourhood plan was unlikely to make the appropriate provision in a timely fashion where the Council would allocate land for development. This approach would make best use of the Council's role as the local planning authority whilst enabling local communities to play a key part in shaping their area.

3.9 identifying the housing requirement of an area on a pro-rata basis of population is an option worthy of serious consideration. It would highlight to communities the potential housing demands it would generate during the life time of the new local plan and inform discussions within a community as to how best they could be met.

3.10 Paragraph 3.9 of the consultation document rightly identifies the need for communities (parish councils) to work together if the approach is to be successful as a consequence of the nature of their

boundaries. In respect of this option it would be appropriate for the Council to play a leading role in ensuring that the identified requirement was capable of being delivered on the most appropriate sites.

3.11 In considering the merits of the highlighted options for the distribution of development the issue of delivery should be an integral part of the process. The current and previous local plans prepared by the Council have relied to a large extent on a small number of large sites. The preparation of the next local plan provides an opportunity to consider meeting the housing requirement via a wider range of sites in terms of size as well as location.

3.12 The NPPF, ref para 68, highlights the important contribution that small and medium sites can make in meeting the housing requirement of an area and that they can often be built-out relatively quickly. It advises that local planning authorities should identify at least 10% of their requirement on small sites. The Council is encouraged to take steps to implement the advice in the NPPF.

3.13 In considering the merits of settlements as locations for development the assessment should not be done on the basis solely of the characteristics of that village. In many cases within Test Valley the services and facilities in one village are shared with its neighbours. There are also a number of villages located close to larger centres of population both within and outside the Borough which means that they have access to a wide range of facilities and services. The proximity to larger centres of population should be a consideration when assessing the merits of settlements as locations for development. The NPPF highlights this issue ref para 77 and promotes a flexible approach particularly in respect of smaller settlements which may look to others nearby for services and facilities.

#### Q9 definition of settlement boundaries

3.14 The policy boundaries which define where development in principle is acceptable has remained relatively unchanged in successive local plans. However, the 2016 Local Plan did introduce a more flexible approach to defining settlements with the intention of creating new development opportunities. In preparing the next local plan that flexible approach should be developed further to help the Council identify locations for the small scale sites that the NPPF wants to be provided. The inclusion of relatively small areas of land which are well related to the existing settlement boundaries could come forward without detriment to the character of the area and help to meet the housing needs of the area.

#### Q33 local gap policy or general policy

3.15 Avoiding the coalescence of settlements is a long-established objective of local planning policy. Such policies have a role to play provided that they are part of a comprehensive approach which meets the development needs of an area. If the current approach of defining local gaps is retained then the boundaries of existing local gaps should be reviewed and justified having regard to the need to make provision for housing and ensure that no more land than is necessary is included. A more general policy with the aim of avoiding coalescence could be considered and the Council would need to be satisfied that it would not be misused to the extent of undermining its value.

Q34 identifying Local Green Space

3.16 There is merit in either of the approaches identified. The key issue is that the designation of Local Green Space should be applied in a careful and systematic way and be consistent with the advice in para 100 of the NPPF

