

Planning Policy

From: Alice Drew <
Sent: 07 September 2018 14:26
To: Planning Policy
Cc: Carolyn Ploszynski
Subject: RE: Issues and Options Consultation
Attachments: 28383 A3 18 08 28 AD CO RS Final Draft Issues and Options reps .pdf

Dear Sir/Madam,

Please find attached representations to the current Test Valley Issues and Options Consultation for the next Local Plan on behalf of Wates Developments Ltd.

I would be grateful if you could acknowledge receipt of the attached.

Kind regards,

Alice

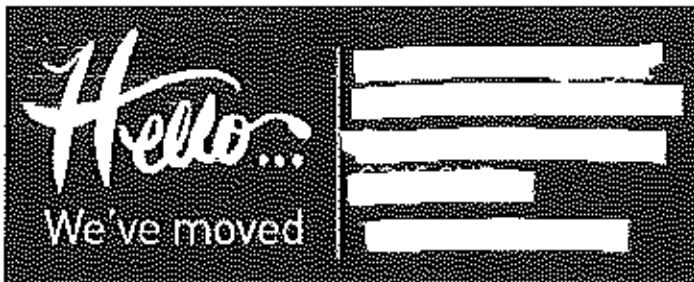
Alice Drew
Planner



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Representations to Test Valley Borough Council Issues and Options Local Plan Consultation

On Behalf of Wates Developments Ltd

September 2018

Representations to Issues and Options Local Plan Consultation

On behalf of Wates Developments Ltd.

Project Ref:	28383	28383	28383
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Appendices

Appendix 1: Site Location Plan

1.0 Introduction

- 1.1** These representations have been prepared by Barton Willmore on behalf of our client, Wates Developments Ltd who has an interest in Land at Velmore Farm, in response to the Issues and Options Consultation on the Test Valley New Local Plan which is currently subject to public consultation.
- 1.2** Test Valley Borough is considered to be a relatively unconstrained district and despite its rural character, it is well connected to major economic hubs and employment areas including Southampton, Winchester, Romsey and Eastleigh. The Borough's unconstrained nature and well-connected location make it an ideal location for future growth.
- 1.3** These representations set out how it is considered that through the appropriate distribution of development, the Local Plan can promote healthy lifestyles, the use of public transport which would help to increase the sustainability of the Borough and be in accordance with the revised NPPF (2018).
- 1.4** Appended to this document is a Site Location Plan (Appendix 1). Land at Velmore Farm is available, suitable and achievable and therefore is a deliverable site that would help meet the Council's housing need, in particular the housing need of the Southern Test Valley housing market area and also provide significant benefits to the local community.
- 1.5** The site has been previously submitted in a call for sites exercise and was assessed in the latest SHELAA published in 2018.

2.0 Responses to questions in the Issues and Options Consultation Document

Question 1 - What is good about living and/or working in Test Valley?

- 2.1 Test Valley is a very well-located Borough, as evidenced by the commuting flows set out in Figure 11 of the Issues and Options Local Plan Consultation. The Borough is surrounded by several major centres, including Basingstoke, Winchester, Southampton and Eastleigh. These economic hubs provide employment and a wide range of facilities and services for Test Valley's residents. It is crucial that the emerging Local Plan considers the relationship to these economic hubs when planning for future growth in the plan period and beyond.
- 2.2 Test Valley is also relatively unconstrained compared to some of the neighbouring authorities. It is considered that Test Valley is an attractive location with a buoyant economy which has the capability to grow further.

Question 2 - What could be improved about living and/or working in Test Valley?

- 2.3 Whilst it is considered that the residents of Test Valley already have a high quality of life, there are several key principles which need to be considered in the new local plan to help improve both existing and future resident's quality of life, as highlighted in the NPPF (2018):
- a) A key focus of the NPPF (2018) is achieving sustainable development. Paragraph 8 b) sets out that the planning system has a social objective *"to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations"*.
- b) In this regard, Paragraph 91 c) of the revised NPPF (2018) sets out that planning policies should aim to achieve healthy, inclusive and safe places which *"enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling."*
- 2.4 In the context of the above National Policy, the Local Plan should promote healthier lifestyles by ensuring that new development provides affordable homes in sustainable locations with good access to major economic hubs and large employment areas via means of walking, cycling and public transport. The Local Plan must consider future growth in the

context of commuter patterns. This would ensure new development is located where the need to travel to employment and other services and facilities is minimised. Where shorter travel distances are then achieved the reliance on the car could be reduced, particularly if development is located with good access to public transport and good walking and cycling routes.

2.5 In addition, opportunities to enhance existing or create new areas of open space and community facilities should be taken to support healthy lifestyles.

2.6 It is evident at Paragraph 3.19 of the Issues and Options consultation document that the car ownership levels in Test Valley in 2011 are very high at 86.5% compared to the national average of 74.2%. Whilst it is recognised that Test Valley's car ownership is likely to remain above the national average due to the rural nature of the Borough, the Local Plan should focus growth where reliance on the car can be minimised. For example, locations with excellent access by sustainable modes to services, facilities and employment.

Question 3 - What should the Local Plan aspirations be for the next 20 years?

2.7 The Local Plan should be ambitious and seek to plan for more than a bare minimum level of growth to ensure that existing and future communities thrive. The Local Plan should embed the economic growth plans of the area and ensure that it supports a strong and competitive economy. The NPPF (2018) paragraph 92 highlights that local policies should ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. Wates believes that the emerging Local Plan should be seeking to guide development towards the most sustainable locations in the Borough to ensure that healthy and safe communities are achieved. Whilst it is obvious to focus development on the two major centres of the Borough, it is considered that there are other, if not more sustainable locations adjacent to the Borough boundary.

2.8 Sustainable locations where public transport is accessible, even if such locations lie outside of the major centres should be considered for development. The southern area of the Borough is located close to Eastleigh and Southampton and whilst these two major centres lie outside of the Borough's administration, development within the Borough near these settlements should not be dismissed. The summary of commuting flows (Figure 11) demonstrates that Test Valley residents commute to neighbouring major centres. As such, 49.5% of existing residents commute to Winchester, Southampton and Eastleigh, all of which are accessible by sustainable modes of transport from Valmore Farm. Such commuting patterns must be considered by the Local Plan when establishing areas to focus

future growth. As mentioned above, the Local Plan should strive to provide affordable housing in sustainable locations with good accessibility to public transport to help reduce the reliance on the private car. Velmore Farm is located very close to the major centres and is highly accessible via public transport. Currently only 6% of Test Valley residents use the train or bus as main methods to get to work (Table 3). Focusing new development in highly accessible, sustainable locations may increase the usage of public transport.

- 2.9 Velmore Farm also has excellent access to the countryside and presents specific opportunities to enhance the local green infrastructure network and accessibility to open space for current and future residents. It also offers a unique opportunity to provide land to expand an adjoining existing successful business parks and provide an integrated approach to housing, economic uses and community facilities and services.

Question 4 - Should the Local Plan's housing requirement be consistent with Government's standard methodology? Do you have any evidence to support your view?

- 2.10 It is important to note that paragraph 60 of the NPPF (2018) states that "*To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance.*" This clarifies how the standard method represents the minimum level of need which should be considered when preparing a Local Plan. It is therefore considered that the Test Valley Borough Council (TVBC) Local Plan housing requirement should be consistent with the Government's requirement that the standard methodology represents the minimum housing need for Test Valley at the outset.
- 2.11 However, it should also be noted that paragraph 1, page 26, of the draft Planning Practice Guidance (PPG, March 2018) outlines how a figure in excess of the standard method may be justified. The PPG states that "*Circumstances where an uplift will be appropriate include but are not limited to; where growth strategies are in place, strategic level infrastructure improvements are planned, funding is in place to promote and facilitate growth (i.e. Housing Deals, Housing Infrastructure Fund).*" It is therefore considered that TVBC should consider whether an increase to the minimum standard method figure is appropriate.
- 2.12 In the context of the above, Paragraph 81 a) of the NPPF (2018) states that planning policies should "*set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration.*" In this regard, the Local Plan should ensure that it takes into account all relevant strategies when

considered an increase to the minimum standard method figure to support future economic growth of the Borough.

- 2.13 The PPG is yet to be formally adopted through the NPPF (2018), following the Government's statement accompanying its publication that they will *"consider adjusting the method after the household projections are released in September 2018."* This decision has been taken by Government due to indications that the 2016-based household projections (to be released on 20 September 2018) may be significantly lower nationally than the previous 2014-based household projections. The relevance of this is that Step 1 of the standard method is based on the household projections, and the 2016-based projections may lead to national standard method figure which is significantly lower than the Government aspire to deliver. However, notwithstanding what the revisions may show, the draft PPG outlines how a housing need figure in excess of the standard method 'minimum' may be justified for other factors relating to growth.
- 2.14 In this context it is considered that the Council should ensure that the minimum local housing need figure generated by the standard method will support its aspirations for growth. These aspirations are outlined in paragraph 6.2 of the TVBC Issues and Options Consultation Plan, which states, *"If we don't plan to meet the business growth needs in the Borough, there is a risk that investment will be targeted elsewhere, meaning workers in Test Valley will increasingly need to travel further afield for work."* In this regard it is considered that housing growth must be high enough to support the economic growth aspired to by the Council, and therefore be in excess of the 'minimum' need determined by the standard methodology if required.
- 2.15 This will need to be reviewed when the standard method and accompanying PPG is formally adopted following possible changes in September 2018.
- 2.16 In addition to the Borough's own housing needs, the Local Plan may need to incorporate the needs of neighbouring authorities. Paragraph 35 a) of the NPPF sets out that in order for a plan to be sound it must be positively prepared *"providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs (our emphasis); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development."* It is therefore considered that under the Duty to Cooperate, Paragraph 24 of the NPPF (2018), the Local Plan should incorporate the unmet needs of neighbouring authorities where possible. The change to assessing housing need through the standard method does not mean there is no longer a requirement to support the

neighbouring authorities unmet need. Therefore, the figure arrived at by the standard method will require some adjustment to include neighbouring authorities unmet need.

Question 5 – Should the Local Plan increase its housing requirement to help support economic growth? If yes, do you have any experience to support this?

- 2.17 As set out at paragraph 81 of the NPPF (2018), Local Plan policies should set out a clear economic vision and strategy that positively and proactively encourage sustainable economic growth and this should be aligned to Local Industrial Strategies. To ensure the spatial strategy of the Local Plan supports and facilitates a strong and competitive economy, updated evidence as to the link between homes and jobs needs to be prepared.
- 2.18 As discussed in respect of question 4, TVBC will need to determine whether the housing need calculated by the proposed standard method (which of course is only the minimum level of local need as referred to in the NPPF) will support its existing economic growth trends and importantly the economic growth aspirations for the Borough. Paragraph 6.1 of the Issues and Options Consultation Plan states that *“The strength of the local economy and the employment opportunities it brings underpins the Borough’s success and contributes to sustainable communities. The next Local Plan is an opportunity for us to set out clearly to developers and investors our ambition for the Borough.”* Failure to provide a housing target which supports these objectives could lead to a housing target which contradicts the clear objectives set out in section 6 of the TVBC Issues and Options Consultation Plan.
- 2.19 At present TVBC’s evidence base does not provide up-to-date evidence to show the number of homes required to support job growth, or what the number of jobs being targeted is. The most recent forecast to have been considered in the evidence base appears to be the Experian forecast set out in the Test Valley Economic Assessment (TVEA), March 2016. This is over two years old and requires updating. Notwithstanding this, the forecast showed projected growth of 6,100 jobs, 2015-2035 (305 jobs per annum). It is unclear whether the number of homes required to support such growth was determined, and whether this level of job growth is considered sufficient to achieve the ambitions of the TVBC Issues and Options Consultation Plan.

Question 6 - Do you think the HMA boundary is broadly right? If not, how and why do you think it should be changed?

- 2.20 Yes. The 2014 SHMA for the PUSH area showed how Test Valley is second only to Eastleigh in respect of commuting flows to Southampton, and third in respect of migration flows. This is also reflected in sections 3.19 to 3.21 and Figure 11 of the Issues and Options Consultation Document . Test Valley clearly has strong links to Southampton and will therefore be one of the local authorities responsible for working with Southampton City Council in addressing unmet housing need from Southampton.
- 2.21 There are clear overlaps between the functional economic and housing market areas of Southern Test Valley HMA and those of Eastleigh and Southampton. It will be important in defining the HMA within Test Valley that these overlaps are acknowledged and that the Borough is not treated as an island in considering locations for growth. For example, there are locations in Test Valley that are on the edge of neighbouring major centres that are well placed to maximise this relationship. Paragraphs 24 to 27 of the NPPF (2018) emphasise how important cross-boundary working is and require LPA's to maintain effective cooperation on strategic matters, such as housing need, that cross administrative boundaries.
- 2.22 The Council has a Duty to Cooperate and this requires an ongoing dialogue to ensure housing and economic needs are met in a sustainable way. This means that the development of the strategy for TVBC and the links across HMA's should be embedded into these discussions throughout the preparation of the plan.

Question 7 - Are there any other approaches to distributing development across the Borough that we should consider?

- 2.23 In order to achieve the Local Plan's Vision, it is important for each town and village to receive proportionate growth, providing they are in a sustainable location, to enable the settlements' services and facilities to be supported throughout the plan period and beyond. Whilst most of the strategic growth has previously been focused in the major economic centres of Romsey and Andover, it is important that the Council focuses future growth in the most sustainable locations and not just the two major centres. As previously mentioned, the Borough has a high car ownership rate due to the rural nature of the Borough. New development should therefore be located in sustainable areas which have good access to public transport and facilities and services within cycling and walking distance.

2.24 In addition to the above, the Local Plan and its Vision should consider distributing new development near neighbouring authorities' major centres. As mentioned in response to question 6, Velmore Farm is located near the major centres of Eastleigh, and the city of Southampton. Whilst both major centres lie outside of Test Valley's administrative boundary, the Borough should not be considered as a 'island', and it is considered that this reason alone should not prohibit future development in sustainable locations near these major centres, where a wide range of facilities, services, transport infrastructure and employment. The major centres outside of the Borough provide a plethora of facilities, services and employment areas. Southampton has a Port, Airport and two universities which provide high levels of employment and opportunity. These locations provide excellent opportunities for the existing and future residents of test Valley and can provide sustainable location to accommodate the needs of the Borough.

2.25 It should also be noted that Romsey accommodated a significant amount of the Borough's growth in the last plan period. The emerging Local Plan's distribution strategy needs to be mindful of the need for sites to maintain a rolling housing land supply. The NPPF (2018) also introduces the Housing Delivery Test which is focussed on completions rather than supply. Therefore, the ability of sites to deliver is a fundamental consideration for the Local Plan. It is considered that given the recent growth at Romsey, additional locations in Southern Test Valley are required to meet the housing needs of the Borough's residents, the Housing Market Area and any neighbouring unmet needs. Velmore Farm is located within a sustainable, accessible part of Southern Test Valley and as such should be considered as a site for future growth to support the Borough's needs.

2.26 Paragraph 103 of the NPPF (2018) sets out that development should be distributed in a way which reduces the need to travel:

"Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes."

2.27 In the context of the above, Figure 11 of the Issues and Options Consultation document shows that 32% of all out commuting from Test Valley Borough is to Southampton and Eastleigh. The sustainable location of Velmore Farm near the major centres of Southampton and Eastleigh could potentially reduce the length of journeys for those commuting. In addition to this, the accessibility to good public transport links could further reduce journeys and the reliance on a private car.

2.28 Paragraph 3.19 of the Issues and Options Consultation sets out that *“According to the 2011 Census, the majority of residents in the Borough commute to work using a car or van (63%), with sustainable travel modes (walking, cycling and public transport) accounting for 17% of all work commutes. The reliance on private vehicles reflects the rural character of the Borough with some areas not well served by public transport. The percentage of households with a car has increased since 2001, from 85.5% to 86.5% in 2011. This is higher than the national average, where 74.2% of households owned a car in 2011.”* Velmore Farm is located in a highly sustainable location with employment areas in walking and cycling distance. In addition, the site is accessible by multiple forms of public transport. It is therefore considered that future residents would not be as reliant on a car as other more rural locations in the Borough.

2.29 In addition to this, section 9 of the NPPF (2018) requires development to promote sustainable transport.

2.30 The above comments with particular regard to National Policy should be considered by Test Valley Borough Council when deciding where growth in the Borough over the Local Plan Period is located.

Question 9 - How should the settlement boundaries be defined in the next Local Plan?

2.31 It is considered that the continual expansion of Test Valley's major centres and revisions of the settlement boundaries could affect the coherence of the settlement in the longer term, and this needs to be avoided.

2.32 The Local Plan should be alive to opportunities elsewhere in the Borough that could reduce the burden on the existing major centres but have the same if not better sustainability credentials for meeting needs.

Questions 10 and 11 - Do you think we should continue with seeking up to 40% of new homes to be affordable, or should we change the percentage? Question 11 - What should the trigger be for seeking affordable housing?

2.33 In the absence of any evidence from the Council, it is difficult to comment on whether or not the provision of up to 40% of new homes to be affordable is still deliverable. It is therefore considered that the Council should undertake research into the need for affordable housing and viability before being able to seek a certain percentage of affordable housing on new residential developments. Notwithstanding this, any affordable housing policy should include a proviso with regard to site viability in order to ensure that

it does not hinder the delivery of much needed housing in the Borough. The emerging Local Plan will also need to consider the wider definition of affordable housing set out in Annex 2 of the NPPF (2018) when formulating the new policy.

- 2.34 The trigger for seeking affordable housing should be in accordance with Paragraph 031 (Reference ID: 23b-031-20161116) of the 'Planning Obligations' section of the Planning Policy Guidance, along with Paragraph 63 of the recently published NPPF (2018). The latter explains that *"Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount."*

Question 15 - Should the Council change its approach and set out a requirement that certain sites should provide for the needs of such groups as the elderly?

- 2.35 According to the NPPF (2018) at paragraph 61, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including, but not limited to, older people. Paragraph 5.39 of the Issues and Options Local Plan Consultation Document indicates that the type of households within the Borough are changing with the over 65 age group forecast to increase faster than any other age group. This will be more pronounced in some parts of the Borough than others.
- 2.36 If specific requirements are set for specific groups these should be based on local assessments that reflect the local community needs and demographic changes rather than Borough wide assessments that do not reflect the differences between different locations and be responsive to market demands through the plan period as these may change over time.

Question 16 - 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?

- 2.37 In the context of the above, a prescriptive policy that requires a set mix and type of housing should be resisted. Instead, the housing market should inform the mix and type of housing, which will differ in different locations and will change over time. A flexible approach is needed to ensure that the up to date needs can be addressed specific to the locality in which the development is taking place. Such an approach could be informed by, but not limited to, Test Valley's Strategic Housing Market Assessment (SHMA) and any other up to

date evidence in the Housing Market Area (HMA). Nevertheless, SHMA's are borough wide documents which do not take account of local needs specific to any settlement or Parish.

- 2.38 Any housing mix policy should also make reference to the importance of surrounding character in determining an appropriate mix, as it is important to achieve an appropriate mix whilst also reflecting the character of an area.
- 2.39 Any policy should simply seek for any mix put forward to be justified by local need and market evidence.

Question 18 - Should the Council establish density standards in the Local Plan?

- 2.40 As recognised by the Issues and Options Consultation document, National Policy allows Local Planning Authorities to define their own approach to housing density through Local Development Plans. TVBC should avoid a borough wide prescriptive policy on housing density as this would not be able to take account of local characteristics and site specific considerations. It is important that any approach promotes efficient use of land whilst ensuring developments reflect the local character of the area.

- 2.41 It is acknowledged that Paragraph 123 a) of the NPPF (2018) sets out that:

"plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport."

- 2.42 Whilst this does suggest setting a minimum standard for density, this is only applicable in instances where there is an existing or anticipated shortage of land for meeting identified housing needs. As the Local Plan will make provision for the appropriate amount of land to accommodate the Borough's housing need, such a minimum standard should not be required. Test Valley is a diverse borough in terms of character and therefore caution should be applied in requiring specific density standards on a borough wide basis.

Question 19 - Do you think we should establish internal space standards for future homes?

- 2.43 Paragraph 127 of the NPPF (2018) sets out that planning policies should ensure that developments create places with a high standard of amenity for existing and future users. In order to ensure that a high standard of internal space is met, the NPPF recommends that planning policies for housing should make use of the Government's optional technical

standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.

- 2.44 Therefore, the Local Plan evidence would need to explore whether there is a need for an internal space standard. If the need is identified then it is considered that Test Valley's new Local Plan should be consistent with the Government's technical standards when establishing internal space standards for future homes.

Question 20 - Do you think we should establish standards for accessible, adaptable and wheelchair user dwellings?

- 2.45 Footnote 46 of the NPPF (2018) sets out that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties.
- 2.46 The Local Plan would need to evidence that the use of these standards are needed through their evidence base in order to incorporate those standards into the Local Plan.
- 2.47 If the need is justified through evidence then the Government's optional standards should be applied rather than other locally devised standards. Any standards set in the Local Plan would need to be tested alongside other policies within the plan to ensure that cumulatively they are viably achievable.

Question 23 - Do you agree that we should have a specific policy on health and wellbeing? What sort of issues do you think it should cover?

- 2.48 Wates deems it to be inappropriate to have a specific policy in the Local Plan focused upon health and wellbeing and believes that it may be more suitable to instead ensure considerations of health and well-being are embedded within the vision and objectives of the Local Plan and then picked up in relevant policies for example in design policies.

Section 6 - Working in Test Valley (Questions 26 - 32)

- 2.49 It is considered that the location of new employment areas should be located where there is an identified need and demand. The Local Plan should provide clear evidence to guide an economic growth strategy for the Borough, in particular the strategy should identify the types of employment that are required and where such employment should be focused.

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- 2.50 In line with paragraph 92 of the NPPF (2018), opportunities to integrate housing with employment should be maximised. This is particularly relevant where there is the opportunity to deliver expansions of already successful employment locations alongside housing and community facilities as there is an established demand for employment in that location. In addition, new employment must be located in sustainable locations, with good access to public transport to attract both employers and employees. For example, the land promoted by our client at Velmore Farm offers the opportunity to expand existing successful business parks alongside the delivery of housing and community facilities in a sustainable location. We would be keen to explore the opportunities to integrate needs through the development of Velmore Farm with the Council and local stakeholders.
- 2.51 A generic policy on the provision of live-work units should be avoided, however in the right locations such an employment use should be encouraged. It should therefore be explored on a site-specific basis in a way that can be responsive to market demand that may change through the plan period.

Question 33 - 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?

- 2.52 Wates believes that Local Gaps should not be retained. The merit of not retaining local designations was identified in PPS7 (2004), paragraphs 24 and 25, which stressed the need for criteria-based policies in place of Local Landscape Designations. PPG7 also indicated that Development Plans should state what it is in local countryside designations that require extra protection and why.
- 2.53 This criteria-based approach was reiterated by NPPF (2012), paragraph 113 which also, whilst flexible in its approach to the protection of landscape areas, importantly stresses that the hierarchy of such sites be clearly distinct. This is followed through in NPPF (2018) at Para 171.
- 2.54 In the context of the above we would recommend replacing local landscape designations with a more 'evidence-based landscape character approach' to the necessity of the essential land only that is required to maintain the visual and physical separation and thus the individual identity of the said settlements.

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- 2.55 If it is decided that Local Gaps are to be retained then specific boundaries should be identified and its retention can only be justified if the Plan can provide a proper explanation of its objectives such that development proposals do not result in demonstrable adverse effects on the functional role of, or the character and appearance of the gap.
- 2.56 The most important point to note on Local Gaps, is to include no more land than is necessary to prevent the coalescence of settlements having regard to maintaining their physical and visual separation. Hence it is important to identify whether the land in question is an important component of the landscape between the said settlements, and as a result the contribution that the Site makes to the function and landscape character of the 'local gap' between the two settlements.
- 2.57 If it is considered that the gap policy is retained a criteria based evidence base needs to justify why land to be included within the Gap performs an important role in defining the settlement character of the area and separating settlements at risk of coalescence.

Question 34 - Should the Local Plan identify and designate Local Areas of Green Space or should this be undertaken via Neighbourhood Plans?

- 2.58 Whilst the designation of green space is a local issue, the emerging Local Plan should not identify and designate Local Areas of Green Space as this would duplicate Paragraph 100 of the NPPF (2018) which states:

"The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land."*

- 2.59 It is therefore considered unnecessary and potentially conflicting to have a local planning policy which copies national policy.

Question 38 - Should the Local Plan encourage energy efficiency when constructing new development?

- 2.60 The Local Plan should promote sustainable construction standards, however this should be through the supporting of national policy rather than through prescriptive requirements set out in Local Plan policy. Any standards set in the Local Plan would need to be tested alongside other policies within the plan to ensure that cumulatively they are viably achievable.

Question 40 - Should the local plan be specific on the type of open space to provide or should it take account of existing provision/ future requirements?

- 2.61 It is evident that the Borough is currently well served by leisure provision with a good number of both indoor and outdoor sports facilities. Such facilities are supplemented by open spaces controlled by Parish Councils (Paragraph 7.21 of the Issues and Options Consultation Document). Paragraph 92 a) of the NPPF (2018) recognises the importance of planning for open space to promote healthy communities.
- 2.62 The Local Plan should provide an evidence base for both existing and future requirements for open space in the Borough.
- 2.63 In the new Local Plan, the type of public open space, should be informed by the evidence base, but should be assessed on a case by case basis. Such an approach would enable local community groups and Parish Councils to be consulted on their needs which would enable new developments to provide open space which is required and will be used by both existing and future residents. When using this approach, each site should provide justification for the type of open space being proposed against the evidence of local and strategic need.

Question 41 - 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?

- 2.64 The Local Plan should require the provision of recreational open space on residential developments to be based on the needs specific local needs informed, but not limited to the Playing Pitch Strategy rather than continuing to set a standard relating to the number of dwellings or size of the site. This approach, if adopted, would enable the delivery of open space and recreation facilities in accordance with the Borough's needs.

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- 2.65 Paragraph 96 of the NPPF (2018) concurs with the above approach by setting out that *“Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.”*

Question 42 - Should alternative open space for mitigation be provided as part of new developments or should land be specifically allocated, or a combination?

- 2.66 Wates believes it is appropriate for the Council to use a combination of both seeking open space for mitigation as part of new development and specifically allocating land for alternative open space.
- 2.67 This combined approach would provide flexibility for the Council and allow them to assess sites on a case by case basis. Where sites that are capable of setting aside alternative open space on site they can do so and where sites cannot provide open space on site, they can contribute to strategic mitigation.

Question 44 - How can the Council promote more sustainable forms of transport such as walking, cycling and public transport?

- 2.68 In order for the Local Plan to promote more sustainable forms of public transport, the distribution of growth is a fundamental factor. As aforementioned, in the response to questions 2 and 3, the Local Plan should distribute new development in sustainable, accessible locations. By focusing growth in areas with access to public transport, residents will be encouraged to use more sustainable modes of transport in accordance with Paragraph 102 c) of the NPPF (2018) which states that plan making should identify and promote walking, cycling and public transport.
- 2.69 The proposed development at Velmore Farm provides an opportunity to link into and enhance existing pedestrian and cycle links. In addition to this, the site benefits from several modes of public transport being highly accessible. Such public transport provides links to large economic employment areas including Southampton, Winchester and Eastleigh. It is evident, in Figure 11, that residents of Test Valley already commute to the major centres served by the public transport near Velmore Farm serves and therefore the

location of new development near to such links could promote the use of sustainable forms of transport.

Question 45 - How do you think the Council should be making provision for parking within new development?

- 2.70 The Council's approach to parking provision should be in accordance with National Policy. The NPPF (2018), at Paragraph 105, sets out a criterion that should be considered if local parking standard policies are set. This criterion includes considering the accessibility of the development, the type use and mix of development, the availability of and opportunities for public transport and local car ownership levels.
- 2.71 In light of the above it is considered that Test Valley's parking provision for parking within new developments should adopt a flexible approach to reflect different locations and accessibility to sustainable transport. A borough wide prescriptive policy should be avoided as that would not take account of the differing contexts within Test Valley. The impact of parking on design quality also needs to be considered in setting policy. In many instances guidance on parking that can be applied to the local context can be more effective.

3.0 Conclusions

- 3.1 We consider that the Council's Local Plan needs to be prepared positively to meet the Borough's housing need. Previously, TVBC planned the majority of their growth around the two major centres; Romsey and Andover. Whilst this approach is understood, it is considered that the Local Plan should look to allocate sites in other sustainable locations which have good accessibility to employment and services whether they are within or beyond the Borough's administrative boundary.
- 3.2 In this regard, Velmore Farm should be considered for inclusion in the Local Plan due to its location next to two major centres; Eastleigh and Southampton. Whilst it is acknowledged that both centres lie outside of Test Valley's administrative boundary, the location of development near these two centres should not be dismissed solely on these grounds.
- 3.3 Velmore Farm is considered to be in a sustainable, accessible location due to close proximity to public transport and major economic hubs. It has been acknowledged that due to the site's accessible location, the number of trips in private cars could be reduced as could commuting times. Wates Developments Ltd. can confirm that the site is both available and deliverable.
- 3.4 Wates believes that the principle of Local Gaps should not be retained in the new Local Plan. Instead, we would recommend replacing Local Gap designations with a more 'evidence-based landscape character and sensitivity approach to the capacity and functionality of gaps and justifying why the land is essential to prevent the coalescence of settlements having regard to maintaining their physical and visual separation'.
- 3.5 We trust that the representations provided are helpful. If the Council would consider it beneficial to discuss the representations provided further then please do not hesitate to contact us as we would be keen to continue to engage with the Council as part of the Local Plan preparation process.

The following information is for your reference only and should not be used as a basis for any decision. It is provided for information only and does not constitute an offer of any financial product or service. It is not intended to be relied upon as a basis for any decision. It is provided for information only and does not constitute an offer of any financial product or service.

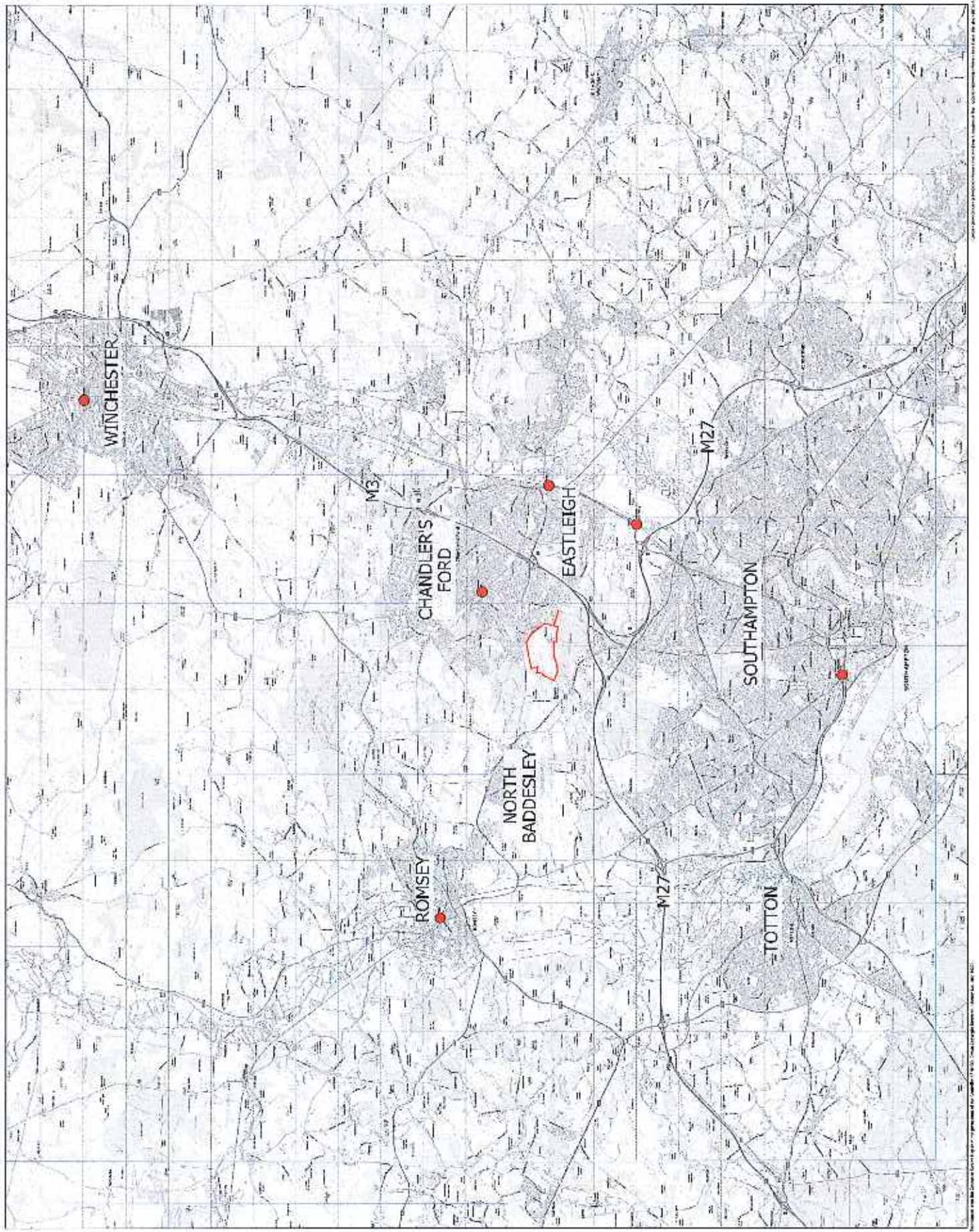
Site boundary



Wilmore Park
Wilmore Farm Context Plan

Scale: 1:5000
Date: 2023
Author: [Name]
Reviewer: [Name]

BARTON WILLMORE
 Environmental & Planning
 100, [Address]
 [City], [State]
 [Phone Number]
 [Website]



Appendix 1 - Site Location Plan