

Planning Policy

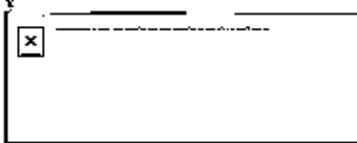
From: Katie Gilbert
Sent: 10 September 2018 17:32
To: Planning Policy
Cc: TH_Planning
Subject: Representations to the Test Valley Issues and Options Consultation
Attachments: 2018 09 10 Test Valley Local Plan Reps.pdf

Dear Sir/Madam

Please find enclosed representations to the Test Valley Local Plan Issues and Options Consultation on behalf of Thakeham Homes Ltd.

If you require any further information please do not hesitate to contact me.

I would be grateful if you would confirm receipt of this submission.



This communication is intended only for the use of the addressee and may contain information that is privileged and confidential. If you are not the intended recipient, you are hereby notified that the unauthorised dissemination of this communication is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone.



THAKEHAM

Planning Policy
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
Hampshire
SP10 3AJ

BY EMAIL ONLY

Dear Sirs,

10th September 2018

Test Valley Local Plan Issues and Options Consultation: Representations by and on behalf of Thakeham Homes Ltd

Thakeham Homes Ltd are submitting representations to Test Valley Borough Council regarding the Local Plan Issues and Options Consultation (henceforth referred to as 'the plan') as local stakeholders. Thakeham are a housebuilder based in Sussex, with a proven track record of delivering high quality, sustainable schemes across the south east.

The purpose of the Local Plan Issues and Options document to collect information on the key planning issues and to explore the possible policy options to address them.

Paragraph 35 of the revised NPPF, which was published on 24 July 2018, explains that to be found 'sound' the plan should be:

- **Positively prepared** – the plan should be prepared based on a strategy which, as a minimum, seeks to meet objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, and based on proportionate evidence
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic matters
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

Q4. Should the Local Plan's housing requirement be consistent with Governments standard methodology?

Paragraph 60 of the revised NPPF states that *'in order 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 – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.'*

It goes on to state that *'In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'*

It is difficult to see how 'exceptional circumstances' could be demonstrated in Test Valley to justify an alternative approach to the standard method, particularly in the context of Test Valley being less far constrained than the neighbouring authorities of East Hampshire and Winchester. East Hampshire is 58% covered by Green Belt, National Parks, AONB or SSSI and Winchester is 41% covered. By comparison, Test Valley is only 14% constrained.

Furthermore, the duty to co-operate is the basis for strategic and cross boundary planning across England. The duty is established in legislation which sets out the process all LPAs must follow in carrying out the duty to co-operate. The legislative framework is also supported by more detailed guidance in both the revised NPPF (paragraphs 24 to 27) and in the PPG (paragraphs 9-001 to 9-023).

Key to the duty to co-operate is ensuring that housing needs in the HMA are met in full. If there are any unmet housing needs in the HMA it is incumbent on the relevant LPAs to identify where any unmet needs will be delivered.

The consultation document fails to give any consideration to addressing any unmet needs of its more constrained neighbours.

The emerging Local Plan will not be considered to be positively prepared if the unmet need from neighbouring authorities is not accommodated, where it is practical to do so and is consistent with achieving sustainable development.

Conclusion

For the reasons outlined above, we consider that the Local Plan's housing requirement should be consistent with Governments standard methodology.

In addition, the plan cannot be considered to have been positively prepared if any unmet needs arising within neighbouring areas have not been taken into account in establishing the amount of housing to be planned for.

I trust the above is clear, but please do not hesitate to contact me if you require any clarification.

Yours faithfully,



Junior Planner

