

Planning Policy

From: Andrew Hayter <andrew.hayter@abbots-ann-parish-council.gov.uk>
Sent: 10 September 2018 19:35
To: Planning Policy
Subject: Comments to the Issues and Options for the Local Plan from Abbots Ann Parish council
Attachments: Abbots Ann Parish Council response to consultation for the Local Plan August 2018 vFinal.pdf

Please find attached the comments to the Issues and Options for the Local Plan from Abbots Ann Parish council.

Kind Regards



ABBOTTS ANN PARISH COUNCIL

Chairman:

Clerk: Mrs Cl

Parish Council Officer:

Tel:

6th September 2018

Abbots Ann Parish Council response to TVBC paper: "Issues and Options for Consultation for the next Local Plan"

Question 4

TVBC has little option but to comply with the government's 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.

Question 5

AAPC believes that there is no need to increase the housing requirement to help support economic growth. The housing target that results from the standard method will imply a significant increase in employment and 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 Objectively Assessed Need (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 (note also 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.

Question 6

AAPC believes that the HMA boundary is broadly right. It reflects the reality of the situation that Southern Test Valley is an outer suburb of Southampton.

Question 7

AAPC supports an approach to distributing development across the borough based on the identification of major development areas
 making use of existing infrastructure;
 co-ordinated with complementary infrastructure investment;
 utilising brownfield sites;
 promoting public transport.

Development in rural communities should be determined by the needs of the local communities by reference to existing NPPF policies and with clear local public support.

Question 8

AAPC offers the following comments on the suggested approaches for distributing growth in Test Valley:

5.19 to 5.20 Community-led distribution

AAPC supports the proposal for parishes to request a housing requirement to be included in Neighbourhood Plans or other community-led processes subject to the residual requirement not being distributed to parishes.

5.21 to 5.23 Proportionate distribution to parishes

AAPC believes that 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

AAPC notes that the paper says that under this method the Council would decide on allocations but the paper doesn't describe a rationale. AAPC supports a policy of major development areas which are well-related to existing developed 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.

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Development in rural communities should be determined by the needs of the local communities by reference to existing NPPF policies.

5.26 Mixed Approach

AAPC supports the extension of urban areas alongside parishes to request a housing requirement to be included in a Neighbourhood Plans or other community-led process.

Question 9

AAPC believes that settlement boundaries should continue to be defined so as to clearly demark 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.

Question 10

AAPC believes that TVBC should continue with seeking up to 40% of new homes to be affordable: Test Valley has a considerable number of people in housing need and 40% appears to be a deliverable target. So TVBC should stick with it.

Question 11

AAPC believes that the trigger for seeking affordable housing 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.

Question 12

AAPC believes that TVBC should not allow market housing on rural exception sites except in line with a community-led development with clear local public support.

Question 14

AAPC believes that TVBC should not establish a policy for dwellings in the countryside that are of exceptional quality. These unique proposals should be the subject of a case by case evaluation.

Question 16

AAPC believes that TVBC should intervene in the Local Plan 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. A policy is required which says that developments should provide a mix of housing that meets the mix of local needs according to ONS predictions unless it can demonstrate that this is not achievable.

Question 28

AAPC believes that TVBC should have a policy which encourages working from home within reasonable levels and subject to restriction on undue traffic generation and other losses of amenity.

Question 29

AAPC would welcome a move towards a more flexible use of primary frontages to encourage greater footfall resulting in a revitalising the retail area.

Question 33

AAPC 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 separate villages and consequent loss of identity. It should be seen as an integral part of settlement policy.

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.

Question 34

AAPC supports the current approach of designating areas of open space in the Local Plan.

Question 36

AAPC believes that the Local Plan should require the renewable energy and energy efficiency performance of new developments to be assessed on their merits.

Question 39

AABC believes that design quality can be improved within the Borough by the encouragement of village design statements to inform any development.

