

Planning Policy

From: Aaron Smith
Sent: 11 September 2018 11:39
To: Planning Policy
Subject: Local Plan Issues and Options - response on behalf of Mr B Fluen
Attachments: 180635-P2 TVBC Local Plan Issues and Options.pdf

Dear Sirs

On behalf of 'Mr B Fluen', Fowler Architecture & Planning Ltd is pleased to have the opportunity to respond to the Next Local Plan Issues and Options Consultation and engage in the process of preparing the next Local Plan (LP) for the Borough.

Please find attached the written response. I would be grateful if you could confirm safe receipt of these representations add our contact details to your database to note that Fowlers are representing Mr B Fluen.

Kind regards

FOWLER ARCHITECTURE AND PLANNING

RIBA 
Chartered Practice



RTPI
Chartered Town Planners

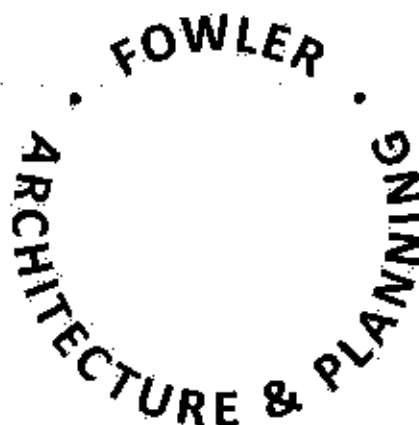
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Our Ref: AS/180635/P2

11 September 2018

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



By email to

Dear Sirs,

**Issues and Options Consultation for the next Test Valley Borough Council Local Plan
On behalf of Mr B Fluen of 9A Picket Piece, Walworth Road, Andover, SP11 6LU**

On behalf of 'Mr B Fluen', Fowler Architecture & Planning Ltd is pleased to have the opportunity to respond to the Next Local Plan Issues and Options Consultation and engage in the process of preparing the next Local Plan (LP) for the Borough.

Our client's interest relates to 'Fluens Yard' located at 9A Walworth Road, Picket Piece, Andover. The site extends to approximately 1.8 hectares of previously developed land and benefits from a range of established commercial uses, including a substantial container storage yard for self storage¹. The brownfield site is known to the LPA as part of the SHELAA (2018) reference SHELAA31 with estimated capacity for 50 dwellings.

The current Local Plan identifies the site is located partially within settlement boundary (defined by policy COM2) and entirely within the Picket Piece site allocation under policy COM6. Map E within the Local Plan identifies the majority of the site as an 'Existing Employment Site'.

The site is available and its redevelopment for residential would be consistent with the prevailing character and uses at Picket Piece. Mr B Fluen therefore wishes to respond to the consultation to the questions that are of most relevance to his interests.

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

The Government's National Planning Policy Framework (the Framework) published July 2018 will apply for the purpose of examining plans. The LP will need to be revised to reflect policy changes which this replacement Framework has made.

The LP aspirations must therefore align with the Framework to enable the delivery of sustainable development in accordance with the Government's policies.

¹ Most recently extended under 11/02869/FULLN

The LP aspirations must therefore enable the LP to apply the presumption in favour of sustainable development as outlined at paragraph 11(a) and (b).

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

Paragraph 60 of the Framework sets out:

'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. 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 therefore clear that the standard method is the starting point, however that the local housing need assessment should fully review the demographic and market signal evidence to determine whether these are germane to the housing requirement, as well as any unmet needs from neighbouring areas. Until such time as a local housing need assessment is prepared by the LPA the Representor wishes to reserve judgement on this matter.

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 decision to increase the housing requirement to help support economic growth should be informed by an up-to-date local housing needs assessment.

On the basis of paragraphs 3.19-2.21 and Figure 11 summarising commuting flows, there is a clear basis for the LP to consider an uplift for economic reasons to balance jobs and workers, and for any uplift to be met, in full. There are substantial in-commuting flows, particularly to northern Test Valley and from Wiltshire, as recognised in the response to Question 6 below concerning the definition of the Andover HMA which extends into Wiltshire (including the settlements of Tidworth and Ludgershall). Mindful that 20% of the population of the Andover HMA live outside of the Borough and the substantive in-commuting flows, an adjustment is required given the pronounced and significant affordability constraints and the differential between land prices, the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be to address the signals.

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

The LP will be evidenced by a local housing need assessment and the requirement to assess needs based on HMAs. The current LP Inspector considered the HMAs at paragraph 27:

'The SHMA acknowledges the distinction between the northern and southern parts of the area. This has been recognised for many years, and results from geography, the proximity of the southern part of the Borough to the South Hampshire region, and the need to maintain and encourage the self-containment of the Andover labour

market. This is not an artificial distinction but a realistic appraisal of the situation on the ground, and is a reasonable approach.'

Any decision to maintain this geography, or propose a variance should be supported by evidence.

In this regard, it is noteworthy that the latest Wiltshire SHMA concludes that the Andover HMA extends into Wiltshire to cover the Ludgershall / Tidworth Market Town. This area accounts for 16,200 persons, equating to 19.1% of the total 84,900 persons within the HMA living within Wiltshire, a sizeable component within a closely defined geographic area. The Andover HMA is the only functional HMA surrounding Swindon and Wiltshire covers more than 1.0% of Wiltshire's population (3.5%).

Paragraph 5.5 of the Wiltshire SHMA is clear that the five housing market areas, including the Andover HMA at Ludgershall *"can be considered as separate housing market areas in the context of the NPPF."* This is because at least two geographies for defining the housing market area agree, in the case of Ludgershall the area is within the Andover commuting and migration zones and is within the Andover functional HMA.

The Wiltshire SHMA Volume 1 'Defining the Housing Market Areas' uses deleted 2007 CLG guidance as the basis to advocate a 'best fit' approach in paragraph 5.16 and 5.17. The deleted guidance supported a 'best fit' approximation for functional sub-regional housing market areas based on local authority administrative areas. This is contrary to the PPG that makes clear the functional HMA, as defined by the analysis, must form the basis and this should not subsequently be approximated as the expectation is that local authorities must work together to coordinate their approach.

Paragraph 5.22 of SHMA Volume 1 summarises that the decision to focus the Andover HMA on Test Valley:

"Whilst around 16,200 of Wiltshire's residents live in the Andover HMA, this represents just under 20% of all residents in the HMA; and given that over three quarters of the area's population (63,700 persons) are resident in Test Valley, it is likely that the Test Valley administrative area will provide the most appropriate "best fit" for Andover functional housing market area."

In response, paragraph 5.25 continues to propose the identification of the Andover HMA within Wiltshire to the Salisbury HMA:

"Over 90% of the population of the Salisbury functional HMA live in Wiltshire. The remainder of the population is divided between the New Forest, East Dorset, Test Valley and elsewhere. Nearly one fifth of the Andover functional HMA population around the Ludgershall area live in Wiltshire, and the BRMA places Ludgershall with Salisbury. It is therefore appropriate to conclude that Salisbury area (including Ludgershall) represents the most appropriate "best fit" for Salisbury functional HMA."

The Ludgershall / Tidworth Market Town represents the secondary settlement in population and scale within the functional HMA. The Market Town and environs has a population of around 16,200. This is second only to the principal settlement of Andover, which itself has 41,552 persons in 2016 within the Andover Town Council geography and around 65,000

when including closely-related surrounding wards. The population level of the Market Town will increase in the period to 2026 as development commitments exist as envisaged under the Wiltshire Core Strategy and emerging Wiltshire Housing Site Allocations DPD. The Market Town is functionally connected in both commuting flows and migration patterns with the Andover area, as recognised by the Wiltshire SHMA.

In summary, the LP must be founded upon a realisation of the actual geographies of the functional housing market area to provide the best arrangement for the local authorities to establish the evidence required to develop the planning. The Wiltshire SHMA recognises the Ludgershall area is within the Andover HMA and it is inappropriate to ignore opportunities for cross-boundary working with Wiltshire Council to deliver the correct planning outcomes.

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

Brownfield land

The Framework promotes the effective use of land, whereby paragraph 117 expects objectively assessed needs should be accommodated *'in a way that makes as much use as possible of previously developed or 'brownfield' land'*. Paragraph 118(c) requires planning policies should *'give substantial weight to the value of using suitable brownfield land within settlements for homes...'* In this regard, the Government requires LPAs to establish and maintain brownfield registers and to take a proactive role in helping to bring forward land that may be suitable for meeting development needs. Paragraph 23 of the Framework requires consideration of the role that brownfield registers have on delivering homes as material to planning for and allocating sufficient sites to deliver the strategic priorities of the area.

The Test Valley Part 1 of the Register identifies nine sites, offering 673 homes. It is noteworthy that SHELAA Site SHELAA31 is wrongly not included on the Register.

Mindful of the limited supply of sites on the Register, it is clear that these will not deliver the housing requirement, however plan-making should prioritise the value of redeveloping such brownfield sites for housing.

This priority should include the benefits of the allocation of SHELAA site reference SHELAA31 for housing. The allocation of the site for housing would be consistent with the prevailing and planned developments in the locality, which is a residential community. The proximity of the commercial site within this residential area is potentially non-conforming. The loss of brownfield sites in commercial use, such as SHELAA31, must also consider the actual value of the site to employment in the locality. In this respect, site SHELAA31 is a very negligible employer as the 1.8 hectare site is largely given over to open container storage uses meaning the loss of this commercial land will have negligible impact on the employment-base of the locality. Such brownfield sites should therefore be prioritised for residential development through housing allocations.

Q8: Do you have any comments on the approaches suggested above?**Community-led distribution**

Paragraphs 11, 65, 66 and 67 of the Framework makes clear that it is the responsibility of the LP to identify land for homes. It is not the ambit of 'parishes to put forward the housing figure' which they will bring forward. To this end, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

Proportionate distribution to parishes

An approach for balanced distribution to parishes would be limited by the available services and facilities necessary to accommodate the additional residential populations. While there may be benefits in delivering proportionate growth, this growth may reinforce harmful impacts and could be constrained by assets of particular importance or protected areas.

Local Plan allocations

With reference to paragraph 67 of the Framework, it is the objective for LPs to identify a sufficient supply of land for homes and mix of sites in order to deliver the housing requirement. The current LP successfully identifies a variety of allocations that have successfully guided the construction sector to deliver homes, particularly to Andover and Romsey which are the most sustainable settlements. There is significant merit in the Council continuing to decide which are the most appropriate locations for housing through allocations, including the newly arising requirement to promote small and medium sized sites under paragraph 68(a) of the Framework.

New village

Clearly the Framework does not preclude LPAs considering new settlements under paragraph 72, however there is presently no evidence that such an approach would help meet identified needs in a sustainable way given the range of opportunities available at the mains and main settlements. The primary disbenefits of a new village are the lead-in time to deliver the necessary infrastructure and creating the place and community. Consequently, a new village option cannot be a viable option in accordance with paragraph 67(a) of the Framework.

Mixed approach

A mixed approach cannot be discounted as the most appropriate means to identify a sufficient supply and mix of sites.

Conclusion

The Representor considers that a range of approaches may be appropriate to the Borough in distributing growth. However, primacy must be placed on the LP identifying sufficient land and a mix of sites consistent with the Framework, including priority towards

redeveloping brownfield sites. In doing so the LP must recognise the role of Andover as the most sustainable settlement in the Borough to accommodate growth and the value of utilising previously developed land within the Andover urban area, including SHELAA site reference SHELAA31, as the most appropriate option to distribute the minimum number of homes needed.

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

There are existing employment sites identified in the LP that offer greater value to their redevelopment for alternative uses. These include SHELAA site reference SHELAA31. While it is accepted that the LP should maintain a balance of offices, warehouses and factories, the loss of some sites, including SHELAA31, to housing would not undermine the function of the employment area. The LP process should therefore review the function and needs of the employment area to deliver the clear economic vision and strategy to support economic growth. In accordance with paragraphs 120 and 121 of the Framework there should be a regular review of both the land allocation for development in plans, and of land availability, which will establish whether such developed land should remain identified for employment uses.

We look forward to reviewing the next Local Plan as part of future consultations.

We also look forward to working with you on behalf of our client in respect of demonstrating the sustainability benefits of the residential allocation of his landholding at Picket Piece, which is a medium site, consistent with the Framework's objectives to promote such sites for housing development.

Yours faithfully,

FOWLER ARCHITECTURE AND PLANNING

Encs

cc: Clients