

## Planning Policy

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**From:** prescott@wanrose.com  
**Sent:** 11 September 2018 21:42  
**To:** Planning Policy  
**Subject:** Response on Issues and Options Report  
**Attachments:** TVBC Issues and Options R+J Prescott.doc

Dear Sir/Madam,

I have taken the opportunity to respond to the consultation document. My comments are not only those of a resident of Romsey, but also as a planning consultant who submits numerous planning applications to TVBC. I have copied and pasted the questions from the document and written answers in a somewhat "clunky" home computer.

While I have sought to be constructive in my responses, I have made some criticisms of the absence of questions on certain issues. In particular, your officers should have a much wider appreciation of what infrastructure comprises. It's much more than transport.

I'm encouraged that you are open to ideas about boundaries of housing market areas, but please recognise that sustainability is not merely a function of accessibility by road.

As a consultant, I have found that officers' understanding of rural issues should be improved. Please take some time to reflect on the developmental needs of farmers in a time of uncertainty. Over the next few months, please consider whether and how Brexit might alter matters.

Thank you for the opportunity to comment. Best of luck. Be brave.

Regards,



## TVBC LOCAL PLAN TO 2036 – ISSUES AND OPTIONS QUESTIONNAIRE

### RESPONSE FROM

**Q1: What is good about living and/or working in Test Valley?**

Test Valley has the advantages of both urban and rural life. It is close enough to the major urban infrastructure, if we want to take advantage of it, but fine quality landscape (including coast) is nearby.

**Q2: What could be improved about living and/or working in Test Valley?**

Infrastructure is a primary concern. Public transport is poor, with the area suffering the usual problem of little investment away from London, and an assumption by national policy makers that we all want to travel there rather than within our own region. House prices are too high, and this is a reflection of the provision of the type of housing, and TVBC have been too weak in ensuring the provision of affordable housing and the right mix of housing in places where people want to live.

There should also be greater employment within the borough, and less out-commuting, but there should also be a greater understanding by TVBC officers of new ways of working. Therefore, broadband and internet provision should be enhanced.

Sixth-form/tertiary education should now be provided in Romsey.

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

To maintain the character of town and country, while recognising that means of living and working are dynamic and should not be set in stone.

**Q4: Should the Local Plan's housing requirement be consistent with Government's standard methodology?**

*Do you have any evidence to support your view?*

We have no evidence, but consideration should be given to greater emphasis on a bottom-up approach led by demand information at the community level. Perhaps (where they exist) neighbourhood plans can inform the process.

**Q5: Should the Local Plan increase its housing requirement to help support economic growth? If yes, do you have any evidence to support this?**

Yes. Development in rural areas. Sadly, rural areas have been neglected.

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

No – I certainly do not. This has been a long-standing criticism of forward planning by TVBC, and yet the previous local plan remained some 20 years in the past! The boundaries should reflect more modern housing markets. How can Braishfield not be in the same housing area as Romsey Extra (as it is presently called)? Braishfield has capacity in terms of schools, roads and areas capable of development without detriment to landscape character to accept a significant increase in population, resisted previously by vested interests. Other settlements previously in Northern Test Valley, but close to Romsey can similarly accept their quotient of new housing, without detriment.

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

*consider?*

**Q8:** Do you have any comments *on the approaches suggested above?*

Certainly, the old-fashioned approach to place undue demands on Romsey and Andover has not worked. However, community-led provision may not work, because of NIMBYism and vested interests. More of a capacity-led approach should be taken.

I fear that the reference to “less sustainable villages” in the borough is framed from 20<sup>th</sup> century thinking. Simply because a settlement has poor transport connections does not make it, by definition, non-sustainable. The old patterns of working and of obtaining our daily requirements are over. I look forward to a recognition by TVBC of “the death of distance”.

**Q9:** *How should the settlement boundaries be defined in the next Local Plan?*

Probably as at present. However, I would prefer a more relaxed understanding of demands for development in the countryside, reflecting the Government's tolerant permitted development rights for changes of use etc.

**Q10:** *Do you think we should continue with seeking up to 40% of new homes to be affordable, or should we change the percentage?*

Yes. It's about right. The issue is enforcing it! Exceptions should not normally be allowed. The relaxation of the requirement at Oxlease Meadows was without justification, and should not be regarded as a precedent.

**Q11:** *What should the trigger be for seeking affordable housing?*

It should certainly be lower than 15! Although some authorities have the threshold at 5 (e.g. Wiltshire), a figure of 10, the same as the definition of a “major application” should apply.

**Q12:** *Should we allow market housing on rural affordable exception sites?*

No.

**Q13:** *How should we meet the requirement for Self Build plots? Should it be as part of sites over a certain threshold or separate sites?*

Development on smaller sites should be encouraged.

**Q14:** *Should we establish a policy that covers dwellings in the countryside which are of exceptional quality?*

No. I have never supported the Gummer-legacy policy, as it provides a charter for the rich to employ architects at great price to circumvent sound planning policies. New dwellings in the countryside should be restricted and related to need, though change of use of farm buildings should be regarded positively unless there are good reasons to take a harder line. However, can TVBC override Government policy?

**Q15:** *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?*

No. Many TVBC residents consider that there is too much provision for the elderly anyway. They place an inordinate pressure on limited resources.

**Q16:** *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?*

Housing policy should reflect what people want in the type of house, and not what the builders are keen to provide – large houses make the greater profit, and drive prices up. TVBC can change this trend,

**Q17:** *Should we restrict the size of replacements and extensions to dwellings in the countryside to keep a range of dwellings?*

No. Stick to the established criteria. Do not follow the ill-founded restricted policy applied by New Forest DC.

**Q18:** *Should the Council establish density standards in the Local Plan?*

Housing density should not be prescriptive, but rather address local criteria.

**Q19:** *Do you think we should establish internal space standards for future homes?*

**Q20:** *Do you think we should establish standards for accessible, adaptable and wheelchair user dwellings?*

Yes to both 19 and 20, but exceptions can be allowed. There should be minimum sizes for gardens.

**Q21:** *Should the Local Plan set out a definition of rural worker? And if so what should it include?*

Yes. Follow case law.

**Q22:** *How do you think we should best meet Gypsy, Traveller and Travelling Showpeople's needs?*

No comment, other than the needs should be demonstrable and based on sound evidence.

**Q23:** *Do you agree that we should have a specific policy on health and wellbeing? What sort of issues do*

*you think it should cover?*

Yes, but not covering the sale of foods – that's not a planning matter and should be down to education. Planning should cover provision of opportunities for sport, recreation and leisure, and should allow for the provision of health facilities, including doctors' and dental surgeries.

**Q24:** *Should some types of facilities and services be given more protection than others?*

**Q25:** *Should we continue to protect all existing community facilities and services?*

Yes to 24/25 unless adequate replacement facilities are first provided. (I've successfully gained planning permission in TV under such a provision.)

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

Yes.

**Q27:** *What are your views on promoting smaller workspaces within the Borough?*

Very supportive. New entrepreneurs should be helped. Including small scale development in rural areas.

**Q28:** *What provisions or controls should be made relating to people working from home?*

No restrictions, providing that the business use does not become predominant. Fast broadband should be provided not to the street, but to each property.

**Q29:** *Should the Council continue to encourage retail uses within primary frontages or should a more flexible approach be taken with a greater range of uses being allowed?*

One has to acknowledge that retail patterns are changing. Therefore, while retail uses should be retained, if possible, other uses should be permitted if there is clear evidence that all efforts have been followed to secure a retail use, but they have failed.

There's already a kitchen design business in Romsey. Is that really a town centre use?

**Q30:** *How should we best continue seeking apprenticeships?*

Provide continuing opportunities for businesses that might encourage apprenticeships.

**Q31:** What should be included in any *tourism policy in the next local plan*?

**Q32:** Should there be measures to *support tourism proposals, and if so, what?*

Policy is already fairly supportive. However, there is a need for a business-based hotel in Romsey to encourage overnight stays. Support for more leisure activities in the countryside would also help – including countryside interpretation. Car parking requirements for tourism facilities should be more liberal.

Greater access to the River Test, both in Romsey and in the countryside, should be encouraged. Game fishing should not dominate matters or prevent reasonable access to the river.

*7.3 "The Council has commissioned a Landscape Character Assessment for the Borough which will help identify and conserve those features which make up our landscape."*

This is a silly statement. ALL features make up the landscape. What TVBC should consider is what creates the character of the landscape and what activities/development could jeopardise that character and what could enhance that character. The present assessment is too descriptive and not helpful to either the LPA and to developers.

**Q33:** 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?*

Local Gaps are one of planning holy cows. Why protect them if, by doing so, there is poor management on land between settlements? General policies based on criteria are far more helpful. TVBC could provide grant aid to sustain good management in urban edge areas.

**Q34:** Should the Local Plan identify *and designate Local Areas of Green Space or should this be undertaken via Neighbourhood Plans?*

We cannot be certain of neighbourhood plans being progressed, so keep as a role for the local plan.

**Q35:** *Should the next Local Plan continue to promote water efficiency from new developments?*

It is not at all evident that TVBC presently promotes water efficiency! What about greater encouragement of the use of grey water for non-potable purposes? What about Catchment Sensitive Farming (as per Upper Avon Catchment)? Poor use of SuDS. Poor relationship to drainage on highways. What about an SPD on this issue? TVBC needs to raise its game.

**Q36:** *Should we identify suitable sites for renewable energy, including onshore wind, in the Local Plan?*

There is a danger in doing so, because it might lead to refusals for appropriate and sustainable development at sites outside "suitable" areas. A greater understanding of the role of renewables and of their impact should inform the wording

of criteria for dealing with proposals.

**Q37:** *If so, which areas of the Borough would be appropriate and for which types of technology (e.g. wind turbines, solar photovoltaic panels)?*

Rather than promoting acceptable areas, greater thought should be given as to why renewables proposals are really damaging to designated areas, even AONBs and (yes, really) the setting of the New Forest National Park.

**Q38:** *Should the Local Plan encourage energy efficiency when constructing new development?*

Of course! Certainly for new buildings, if not for extensions/retrofit. Also, housebuilders should be obliged to consider energy generation by new housing. TVBC should lead the way on sustainable operation.

**Q39:** *How can we improve design quality within the Borough?*

By recognising local vernacular. By providing a strong policy guidance document that is encouraging and not prescriptive. By understanding sense of place. By asking local people what designs they want. By holding design competitions.

Start by having lower roof pitches on houses. By not necessarily accepting the bland designs promoted by multiple house builders. Get your development management staff to understand design principles.

By being innovative.

By recognising that trees and shrubs are not add-ons to schemes as mitigation, but should inform scheme design. By allowing people to express themselves in community art.

**Q40:** *Should the local plan be specific on the type of open space to provide or should it take account of existing provision/ future requirements?*

**Q41:** *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?*

The latter to both questions. It is best to adapt to local circumstances.

**Q42:** *Should alternative open space for mitigation be provided as part of new developments or should land be specifically allocated, or a combination?*

Your terminology is unhelpful. You don't really mean open space, which has more of a leisure/recreation connotation. What you should be referring to is habitat creation or enhancement. (I accept you might get sites which can fulfil a dual function. Oxlease Meadows is such a site, and I fear public access is likely to be over-restricted.)

**Q43:** *Is there anything additional which the Council should be taking account of? (Heritage)*



Your conservation staff are normally constructive (much better than Wiltshire!) A more relaxed attitude should be taken to streamline double glazing in conservation areas/listed buildings.

### **Why is there no question on other aspects of infrastructure than transport?**

No reference to sewerage. No reference to flood management measures. No reference to tertiary education. No reference to space for burials (including woodland burials)

**Q44:** *How can the Council promote more sustainable forms of transport such as walking, cycling and public transport?*

It would help if housing allocations were not on the edge of the larger settlements and were liberally placed in villages, so that bus services would be more viable.

Introduce electric charging points.

Encourage cyclists to use cycle lanes and keep off roads when they are provided to a good standard!

Think more about impact of development on (users of) rights of way. Get developers to introduce permissive routes and/or dedicate new rights of way. Consider better links to the countryside and not simply to towns.

Restrict car access to The Hundred in Romsey from 9 to 5.

**Q45:** *How do you think the Council should be making provision for parking within new development?*

**Q46:** *Do you agree with the Council's current approach or are there changes you would like to see made?*

My experience as a planning consultant is generally favourable. I prefer a "maximum" approach to parking. As householders do not often use garages for accommodating cars, TVBC should encourage adequate space to be provided within residential curtilages, to reduce cars parked on roads. Parking in restricted areas should be more severely enforced.

TVBC should adopt roads provided to adoptable standards, and should force developers to achieve those standards.

