

Planning Policy

From: chris.lyons <chris.lyons@wyg.com>
Sent: 13 September 2018 11:04
To: Planning Policy
Subject: Representation to Issues & Options consultation
Attachments: Issues & options submission - Sept '18 (final).pdf

Dear Sirs,

Please find a representation on the Issues & Options consultation attached on behalf of Bellway Homes Ltd (Wessex). I would be grateful if you would acknowledge receipt.

Yours faithfully,

Dr Chris Lyons
Director - Planning

WYG

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**ISSUES AND OPTIONS CONSULTATION FOR THE NEXT
LOCAL PLAN**

Test Valley Borough Council

**Response on behalf of Bellway Homes Ltd (Wessex) & the
Trustees of the Captain Busk Grandchildren Settlement**

September 2018



Document Control

Project: Land West of Houghton Road, Stockbridge
Client: Bellway Homes Ltd (Wessex) and Trustees of the Captain Busk Grandchildren Settlement
Job Number: HP17059-A105291

Document Checking:

Prepared by:	Dr Chris Lyons	Signed:	CL
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Checked by:	MA	Signed:	MA
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Issue	Date	Status
1	30/08/2018	Draft
2	11/9/2018	FINAL



1. WYG has been instructed by Bellway Homes Ltd (Wessex) (and on behalf of the Trustees of the Captain Busk Grandchildren Settlement) to respond to the Test Valley Borough Council 'Issue and Options Consultation for the next Local Plan', July 2018. The document is called 'Our Future – How do we Plan for it?'
2. This response should be read alongside the WYG detailed promotion document from October 2017 that sets out why the Land to the West of Houghton Road, Stockbridge is a suitable site for allocation for residential purposes. However, this response will focus on the higher-level questions raised in the consultation document about strategic issues and does not rehearse the site-specific arguments that have been set out to demonstrate the site is suitable, sustainable, can be delivered, is available and achievable.
3. We believe that the focus within the Northern Test Valley area to deliver 91% of the dwellings in the area around Andover with only 9% in the Rural area is the wrong approach and unbalanced. While Andover would be expected to take a significant share of housing as the main settlement in the north, it is wrong to leave the other settlements with little realistic ability to grow and become more sustainable. We support a strategy that encompasses a variety of site types and sizes to meet the NPPF paragraph 20 requirement for Local Plans to identify an appropriate and sustainable strategy for the pattern and scale of development and help reduce travel. A rebalancing of the strategy to include a larger proportion of other sustainable settlements would address these spatial, delivery and transport objectives.
4. The existing adopted Local Plan 2011-2029 identified that Stockbridge is an important local centre for neighbouring rural communities and is identified as the third most important centre for the local economy (after Andover and Romsey). It is identified as a Key Service Centre and has access to the facilities identified as necessary for a sustainable centre. Table 7 of the adopted Local Plan identified Key Service Areas (KSA) as suitable for strategic allocations and Stockbridge is the only KSA identified as suitable for a Rural Affordable Housing site. Therefore, the local plan accepts in principle that Stockbridge is an important centre with demand for more housing, both strategic in nature and to meet an accepted affordable housing need. However, the current approach will not deliver the necessary housing needed and this will be expanded on later.



5. The WYG promotion document sets out how the Housing evidence base locates Stockbridge within the broader Central-Rural Test Valley sub-housing area, and this is identified as the highest for entry level purchase prices in the Borough with an average house price of £475,000. Stockbridge itself is even more expensive with average house prices at £689,322 (2017). There needs to be a significant injection into the housing supply within the Central-Rural area, and particularly in Stockbridge, to ensure prices do not continue to grow and remain completely out of reach of everyone, apart from the rich. Stockbridge needs the housing to seek to resolve some of this problem but also is a suitable location because it is the most sustainable of the settlements within the Central-Rural Test Valley housing area.
6. Stockbridge has a lower than average dwelling occupancy rate with 43% of dwellings in single occupancy and an increasing number of people aged 65 and over. This tells a story of local people who have probably lived in Stockbridge for a long time and are committed to staying there but with little option to downsize within the immediate area due to the lack of supply of new housing. Therefore, they stay in their large house and under-occupy it, whereas the house could be used for families that want to live in the area.
7. It is essential that new families and individuals are encouraged into Stockbridge to support the local shops and facilities, so they remain viable. There are a good variety of shops, pubs, services, and facilities in existence but as the Issues & Options document recognises, the pressure from on-line shopping is growing and new customers are needed to keep them open. The settlement is one of the best served for the relatively small population but while this is a current benefit, the obvious threat is there if online trade continues to reduce footfall.
8. Stockbridge needs to expand for a sustainable future and expanding to the west appears to be the logical location due to the constraints in the other directions in Stockbridge. It is not considered rational to leave Stockbridge without further housing as this will not address all the socio-economic issues that Stockbridge faces around unaffordable housing, little choice for existing residents to downsize, lack of options for families to move into the area, and a growing pressure on shops and facilities from on-line shopping.



9. The Issues & Options document identifies these concerns and accepts that the inability for people to afford their own home is a major problem (para. 3.6) and it has been demonstrated above that this is an even bigger problem in the rural areas. In addition, the Issues & Options document also accepts that commuting patterns are resulting in a higher reliance on private cars with 10% more households in Test Valley owning a car than the national average. Unlike some of the sites in Andover that are 2km from the town centre and more likely to result in an increase in car ownership there are other sites available and worthy of consideration in more compact settlements, like Stockbridge less than 800m from its centre, giving a realistic option for people to walk into the centre and catch public transport to work.

10. It is considered that the current approach as set out in para. 5.9 of the Issues & Options document to focus on large sites in Andover and Romsey does not meet the upcoming challenges that are set out later in the same paragraph. This points out that national planning policy seeks to distribute development to reduce the need to travel, that development should promote and retain existing services, and support rural areas. It is not clear how focusing on Andover and not allocating sites in Stockbridge meets these requirements to promote the services in Stockbridge or supports the rural areas that Stockbridge meets the needs for. This point is expanded on in paras. 5.12 - 5.14 of the Issues & Options where it specifically accepts that those in rural villages and settlements rely on the market towns and they are becoming increasingly unaffordable for families and young people and that they lack downsizing opportunities through lack of supply. It points out how this leads to unbalanced communities and can affect services, facilities, employment and housing. The current local plan strategy of relying on community led planning and rural exception sites to meet these needs in rural communities is clearly not addressing this issue in any significant way and a step change is necessary. It is understood that there are currently no 'made' Neighbourhood Plans in the Borough and so there will not be (m)any sites coming forward from the community in the foreseeable future and only 9 dwellings have been delivered under the rural exception sites policy in the last 5 years. This scale of 'support' for rural communities clearly is not sufficient to address these challenges.



11. We believe that the current approach of focusing on Andover and Romsey is not the whole solution, there needs time for the new communities to integrate and the locations on the edge now being promoted are actually less sustainable than other possible locations. For example, it is approximately 3.5km from the middle of Picket Piece (walking) to the Guildhall in Andover town centre, whereas it is only 800m from the edge of Stockbridge to the centre – less than a quarter of the distance.
12. Simply allocating more sites on the edge of Andover to meet the housing needs of the Northern Housing Market Area for Test Valley is not as sustainable as delivering more homes in settlements with the facilities already in place to support more people. There is even the risk that by not adding to the populations that those facilities will not have the critical mass of users to sustain them. The NPPF recognises this point clearly and states:

"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby." (paragraph 78 of NPPF, 2018).
13. This perfectly encapsulates the argument for expanding the population at Stockbridge to support local services both within the settlement itself, but also in supporting the neighbouring settlements that rely on it.
14. Therefore, for the reasons stated above, and even reflected in the Issues & Options documents itself, it is considered that a new approach is needed with a mixture of options pursued. This includes continuing with local plan allocations but not just in the two main settlements as other Key Service Areas should be examined for allocations to ensure they have enough new development to underpin a sustainable future. This should be developed in conjunction with a variation to the set out 'proportionate distribution to parishes' as this should not just be based on the existing population but should be weighted to reflect the sustainability of the location. It isn't logical to increase two settlements of the same size by the same amount if



one has significantly more amenities and better transport to support the new development than the other, just because they are historically the same size.

15. Planning is underpinned by the need to ensure new development is sustainable, so it is essential that new development is directed towards the settlements that can provide a sustainable location. As has been set out in our promotion document (chapter 3), Stockbridge has a host of facilities including:

- a) Primary school
- b) Secondary school
- c) Four public houses
- d) Restaurants and cafes
- e) Pharmacy
- f) GP surgery and dentist
- g) Co-operative food store and Post Office
- h) Greengrocer, butcher, fishmonger
- i) Various shops
- j) Places of worship
- k) Fire station
- l) Guest houses & hotels
- m) Vets
- n) Scout hall
- o) Recreational ground and children's' play area
- p) Sports facilities – sports hall, tennis courts, gymnasium, swimming pool

16. Despite all these facilities, the population is listed as only 592 in comparison to other settlements with similar facilities across Hampshire having, on average, a population of 5,219 and even the other Key Service Areas in Test Valley average a population of 4,565.

17. Again, the NPPF supports this approach to expanding settlements with significant extensions where they have suitable infrastructure and facilities, such as Stockbridge:

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well



located and designed, and supported by the necessary infrastructure and facilities." (paragraph 72 of NPPF, 2018).

18. The 'community led distribution' and 'new village' ideas are not wrong in themselves, but the Neighbourhood Planning process cannot be relied upon to deliver enough housing in a timely manner to meet the scale of housing required. Likewise, a new village is such a long-term proposal that it will not meet the existing needs identified in the next ten years at least.
19. In response to **question 4**, Bellway Homes support the Government's standard methodology and believe that the local plan's housing requirement should follow that approach as this brings an objective and consistent approach to the housing numbers debate.
20. Bellway Homes also believe that the answer to **question 5** is that increased housing clearly supports economic growth and would have a boost for the local economy around Stockbridge. The Home Builders Federation carried out research in 2015¹ that demonstrated the economic impact of housebuilding with new jobs created both directly and in supporting industries, a significant boost for suppliers (many of whom are small local businesses), and increased expenditure in local shops and services. The small businesses in the rural community around Stockbridge would stand to benefit considerably from new development, both in the shorter term during construction, and then on-going from the new residents.
21. For all the reasons set out above, we believe that the answer to **questions 7 & 8** are that there should be a revised 'proportionate distribution to parishes' where Key Service Areas are given a proportion of new development that is weighted in accordance with how sustainable the settlement is and not just on existing population. We believe that it is self-evident that Stockbridge can therefore take a significant increase in development that better utilises the existing facilities in a sustainable location. This could be augmented by 'local plan allocations' that identify a significant number of strategic locations for significant housing numbers (the number is debatable but perhaps those larger than 200 dwellings) and that this looks outside

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[https://www.hbf.co.uk/fileadmin/documents/research/Economic Fotprint BPF Report March 2015 WEB.pdf](https://www.hbf.co.uk/fileadmin/documents/research/Economic_Fotprint_BPF_Report_March_2015_WEB.pdf)



the two main settlements to allocate in Key Service Areas in the first instance. Again, Stockbridge would be the main location to identify a suitable site for allocating.

22. **Question 9** asks about the settlement boundaries and accepts that currently they are drawn along physical boundaries rather than more loosely around the edge of the built-up area. We are of the view that this needs to change as this stifles the ability of settlements to grow and does not reflect the NPPF, which calls for local plans to be "...sufficiently flexible to adapt to rapid change." (NPPF, 2018, para. 11). A tightly drawn boundary along existing properties offers a rigid solution to settlements and not the flexibility that is required.

23. Likewise, **question 18** would impose an arbitrary density standard rather than give the flexibility that the NPPF seeks. Sites should not have a uniform density level imposed on them but need to balance making the best use of land, the viability of the site so it can be delivered, and reflecting local site pressures, such as avoiding areas of flooding, providing an enhanced setting close to a listed building etc. that needs to be determined on a site by site basis. Sites should be designed with all these issues under consideration rather than an arbitrary figure somehow imposed. Para. 122 of the NPPF explains the importance of making an efficient use of land, considering local market conditions and viability, the availability of infrastructure, and the character and setting of the area. The NPPF has been bolstered to ensure good design is achieved so local authorities have the tools to refuse schemes that are overly dense and result in bad design. Therefore, there is no need to impose density standards.

