

Planning Policy

From: Joe Green
Sent: 13 September 2018 11:28
To: Planning Policy
Subject: Issues and Option Consultation - response
Attachments: TVBC LPI & O consultation response 2018.pdf

Dear Sir/Madam

Please see attached my comments in response to the Council's Issues and Options Consultation document.

Today's publication by Government of its further commitment to Small and Medium size house builders via the Home Building Fund, evidences my point that it is not just the general public who are concerned about the current oligopoly of the big national house builders and the threat that they pose to our rural environment.

Please confirm safe receipt of this email by return.

Best regards

Mr J. Green

P. S. Keep up the good work.

TVBC - Issues and Options consultation - July 2018

Question number	Question	Response/Comment
5	Should the Local Plan increase its housing requirement to help support economic growth? If yes, do you have any evidence to support this?	Rural settlements should be allowed and even encouraged to grow with a tiered settlement boundary system allowing for modest growth making them more 'self-sustainable' in terms of facilities. Too often rural facilities are forced to close due to viability, the lack of 'chimney pots' and the economic pressures from national chains. If this is allowed to continue all but a select few rural communities will stagnate, die and become just 'a place to live'.
7	Are there any other approaches to distributing development across the Borough that we should consider?	<p>A purely target led approach to housing growth means that the larger settlements of Andover and Romsey are expanding beyond recognition with no apparent plan for the economic growth of the town centres themselves. The NPPF and the housing white paper – Fixing Our Broken housing Market - commit Government to place great weight on “building many more houses, of the type people want to live in, in the places they want to live.” The rural settlements are being overlooked. Modern 'estate' volume type housing should be strongly opposed in rural areas and only new development which respects the particular character should be considered. Self-build and small housebuilders are best placed to deliver the right type of housing for the rural settlements.</p> <p>The advent of electric cars and greener private transport modes should reduce the reliance on more traditional “sustainable” public transport systems that serve the rural communities which are so infrequent they are rarely used.</p>
9	How should the settlement boundaries be defined in the next Local Plan?	<p>While some housing types certainly would benefit from a location more central to the settlement, ie housing for the elderly, it is unrealistic to expect all new development to be built within the boundaries of existing settlements, regardless of its size.</p> <p>Settlement Boundaries could be altered to have a 'tiered' system ie. the settlement boundary defines the existing settlement, Tier 1 is an area of land with a defined limit which adjoins the settlement boundary, Tier 2 being the countryside. This system would allow for modest expansion of the smaller settlements on land contiguous with the settlement boundary without development affecting the historical centres and without causing coalescence. This could be expanded to three or more tiers for the larger settlements. Any proposals would still have to comply with the various other policies.</p>

12	Should we allow market housing on rural affordable exception sites?	<p>The Exceptions Site policy is a positive policy but it is being exploited by the so called Registered Providers. The people who benefit the most from the current system of AH are the Shareholders and the Directors of the Registered Providers. This is evidenced by the extreme growth rate of some of the large providers and their expansion into 100% Market Housing developments. Allowing MH on exception sites will exacerbate this.</p> <p>The system should be adapted to make it easier and more attractive for the local communities (Parish Councils or Local Stakeholders) to take-on new AH on exception sites, local control of these assets would benefit the local communities economically and socially.</p>
14	Should we establish a policy that covers dwellings in the countryside which are of exceptional quality?	<p>This is a positive policy and should be retained, it allows for new houses of exceptional quality to be created in the countryside, this has a positive impact on the local economy.</p>
15	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?	<p>With an ageing population this could be considered but care would need to be taken to avoid exploitation of rural settlements by volume builders (see response to AH above).</p>
17	Should we restrict the size of replacements and extensions to dwellings in the countryside to keep a range of dwellings?	<p>The 50% increase in volume is an arbitrary figure, what is the justification for it? Good quality, well designed buildings do not detract from the landscape they enhance it. The current trend of using landscape buffers is a negative approach to development in the countryside, it is saying that all development is bad and should not be visible in the landscape. Replacement dwellings in the countryside are an efficient way to update and make use of often outdated houses in the countryside.</p>
18	Should the Council establish density standards in the Local Plan?	<p>Current design standards consider 25 dwellings per hectare (dph) as 'low density' and that a minimum of 30 dph is required to make efficient use of land. Rural settlements within the Borough have densities closer to 10 dph. In the rural settlements fewer than 20dph should be preferred unless special circumstances can be demonstrated to prove that there will be no unacceptable adverse impacts on the character and appearance of the area. Many of the settlement boundaries include all or part of the Conservation Area so new development within the confines of the built up area at these densities could have an impact on the heritage asset of the village.</p>

19 & 20	<p>Do you think we should establish internal space standards for future homes?</p> <p>Do you think we should establish standards for accessible, adaptable and wheelchair user dwellings?</p>	<p>Introducing more design guidelines will further standardise the housebuilding industry and further reduce any design freedom of the self-builder and small and medium housebuilders that Government is so keen to encourage. Requirement to comply with an ever increasing number of regulations further weights the market in favour of standard stamped-out house 'types' and further prices out the self-builders and small builders.</p> <p>Any space standards should be directed towards the high density areas including new housing estates where the national housebuilders have a handful of house 'types' that are 'stamped-out' across the country.</p>
21	<p>Should the Local Plan set out a definition of rural worker? And if so what should it include?</p>	<p>The requirement for "Rural Workers" has reduced dramatically following the standardisation and commercialisation of such industries, as such the demand for rural worker housing has decreased. A change to the definition of rural workers could be targeted at "Manual Workers" which might allow for people in lower paid jobs to afford housing where they need it. The difficulty in this definition is that "Manual Workers" would have to be tied to a location.</p>
31 & 32	<p>What should be included in any tourism policy in the next local plan?</p> <p>Should there be measures to support tourism proposals, and if so, what?</p>	<p>Sustainable tourism contributes greatly to the Test Valley and proposals for small scale local tourism that are sensitive to their environment and increase awareness to local features or the wider Test Valley countryside should be encouraged to start up and/or grow.</p>
33	<p>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?</p>	<p>Coalescence is a bit of a non-issue -</p> <p>At the rural settlement scale it would realistically take hundreds of years for any of the settlements in the Borough to coalesce. The settlements within the borough have already been growing organically for hundreds of years. Modest, sustainable growth of settlements by local people is how communities have grown since time immemorial. It is only when the threat comes from national volume builders that coalescence of rural settlements should be considered an issue.</p> <p>At the larger settlement scale of Andover and Romsey, these towns will always expand towards nearby settlements in some cases enveloping them.</p>

36 & 37	<p>Should we identify suitable sites for renewable energy, including onshore wind, in the Local Plan?</p> <p>If so, which areas of the Borough would be appropriate and for which types of technology (e.g. wind turbines, solar photovoltaic panels)?</p>	<p>The most logical place for the installation of, certainly pv panels, is the roofs of large commercial and industrial buildings. This would preserve the countryside and make efficient use of developed land, even if the plant only serviced the commercial/industrial estate on which it was located it would reduce the burden on the grid. Watworth and Portway Industrial Estates as well as the new Co-Op warehouse are a prime example.</p>
39	<p>How can we improve design quality within the Borough?</p>	<p>Meeting current building standards while respecting the character of the historical environment can be achieved through a combination of the right choice of materials and sensitive design. Modern generic 'volume' house designs should be strongly opposed in rural settlements.</p> <p>The Government's pledge to support smaller builders and self-builders who embrace innovative and efficient methods will help ensure that new houses are designed and built by the people who are directly impacted by the development and have the most to gain from sensitively designed, high quality homes. The imposing of any new regulations will further "standardise" the housing stock.</p>
41	<p>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?</p>	<p>This is a technical question aimed at the large scale developments. The Sport England PPS guidance is vague and un-helpful. In lay-terms it would seem that a per dwelling or per hectare approach should be appropriate. Rounding up the per dwelling or per hectare equation to the nearest full sports pitch should allow the PPS to be incorporated.</p>
44	<p>How can the Council promote more sustainable forms of transport such as walking, cycling and public transport?</p>	<p>Private modes of transport are becoming more sustainable making the rural settlements more environmentally sustainable places to live. The electric car should be considered as a sustainable form of transport and certainly more sustainable than the buses that serve the rural communities as they often drive around without any passengers.</p>

GENERAL COMMENTS

Provision of schools - The education gap or postcode lottery means that high performing schools are in such demand and when these high performing schools are located in rural settlements this causes an out-commuting from the nearby urban centres of Andover and Romsey. Village schools are no longer "village schools"; this can often be compounded by families within the affluent rural settlements sending their children to private education at KS2 creating a void in the public system from school year 3 (known as state-411-eight).

The NPPF and the housing white paper – Fixing Our Broken Housing Market - commit Government to place great weight on *"building many more houses, of the type people want to live in, in the places they want to live."* It goes on to state *"Quite reasonably, people often have concerns about the impact new housing will have on their community. That is why it is so important that people have a say over where new homes go and what they look like through the planning process."* At a community level *"the Government is offering a simpler and clearer planning process that makes it easier for them [the community] to get involved and shape plans for their area. We [The Government] will ensure they see the benefits of housing growth and have greater say over the design of local developments. In return, the Government asks communities to accept that more housing is needed if future generations are to have the homes they need at a price they can afford."* This is especially true of the "rural" settlements of the Test Valley, too often younger generations are forced to leave the communities in which they were brought up to move to modern housing developments on the urban fringe, the so-called "sustainable locations". These "sustainable locations" are by their very nature harming the sustainability of the rural communities.

Rural settlements should be encouraged to accommodate modest growth in housing numbers through the provision of new homes, purpose designed to meet local needs including elderly downsizers, and to provide a balance of dwelling types to serve the community over the longer term. If addressed at plan level, there are some strong, positive impacts when providing for new homes to meet local need including: the protection and enhancement of the natural environment and the landscape; the viability and sustainability of community facilities and the vitality of the community itself. A 'tiered' settlement boundary system would allow for small scale development of the right type on land contiguous with the current boundaries to be supported in principle provided it does not conflict with other policies. Due to the irregular plan forms of the Settlement Boundaries there are areas outside of the boundary that are geographically closer to the settlement centre and more 'sustainable' than much of the defined settlement.

Government's pledge to support smaller builders and self-builders who embrace innovative and efficient methods will help ensure that new houses are designed and built by the people who are directly impacted by the development and have the most to gain from sensitively designed, high quality homes.

Any 'One-size-fits-all' policy making and design guidelines adversely affect the small and medium size housebuilders that Government is keen to encourage. It doesn't streamline the decision making progress it introduces more, unnecessary "red-tape". It also restricts the variety of design that often contributes to the character of Test Valleys rural settlements.

The protection and enhancement of a neighbourhood's natural and built environment are key to the long term prospects of any settlement. Although the majority of the Test Valley is classified as rural it is not just the countryside that makes it attractive, the built environment plays an equally important role in making it a desirable place to live and work.

