

Planning Policy

From: Caroline Jezeph <caroline.jezeph@jezeph.com>
Sent: 13 September 2018 12:05
To: Planning Policy
Subject: Test Valley: Issues and Options Response
Attachments: 13.09.18 L Fairlie submission.pdf

Dear Planning Policy Team

Please find attached responses to the Issues and Options paper made on behalf of:

- Mr Lyell Fairlie
- Mr Marcus Evans
- Bryan Jezeph Consultancy Ltd

Please could you acknowledge receipt.

With kind regards

Caroline Jezeph

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**RESPONSES TO THE TEST VALLEY
ISSUES AND OPTIONS CONSULTATION
FOR THE NEXT
LOCAL PLAN**

**RESPONSES MADE ON BEHALF OF
BRYAN JEZEPH CONSULTANCY LTD**

September 2018



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

Answer

It is a relatively affluent area with reasonable housing and employment provision. The population has a relatively good educational level which has improved between the last census and the one before.

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

Answer

The deficiencies which have been identified eg the affordability of housing, the ageing population, the poor public transport and reliance on private transport all need to be addressed.

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

Answer

To make progress on the above issues and to avoid any retrograde steps.

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

Answer

It seems that the Council will need to take an approach consistent with the Governments standard methodology or will it not be the case that the Plan would be rejected as not being in accordance with National Planning Policy?

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

Answer

Given that your paper advises that there is a small out net migration for employment I would have thought that the emphasis should be on jobs. However, no society should be complacent and therefore some additional housing is likely to be an added stimulus to the economy.

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



Answer

The Housing Market Area Boundaries in Test Valley area to be very skewed towards Andover. No explanation is given. On the face of it those parishes to the north of Romsey relate more to Romsey than to Andover. Anyone looking to move to the Romsey area would inevitably also consider Braishfield, Michelmersh, Awbridge, Sherfield English and those parishes to the southwest of the district.

The HMA boundaries should be redressed to provide a better balance between Andover and Romsey and to better reflect the choices that people are likely to make.

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

Answer

The failure to provide more housing in the rural villages has created enclaves of great wealth and expensive housing and an ageing population. The less wealthy have to rely on affordable housing. The services including shops and schools and community facilities suffer gradual decline. Every settlement and village needs to be assessed to examine its potential to accommodate more development

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

Answer

Community led distribution is aspirational. Very few communities actually want to encourage new housing.

Proportionate distribution to Parishes sounds equitable but in reality, some parishes would be better placed to see growth than others

Local Plan Allocation has the benefit of the application of professional planners' judgements on where housing might best be accommodated.

New Village option may not be the best for Test Valley. The district is dispersed and there appears to be no immediate pressure for a new village. It would take many years to establish and would suffer the problems of the existing villages in terms of transport links. Far better to use the existing resources in existing villages and build upon them.



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

Answer

The existing criteria for defining settlement boundaries is logical. However, it needs to be implemented in a sensitive and pragmatic way. All existing boundaries should be reviewed with a view to making minor modifications if appropriate. For example: where an appeal has been allowed that changes the situation on the ground; or where a boundary tightly follows a curtilage resulting in the exclusion of a small area of land which is effectively surrounded on three sides by defined urban area.

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

Answer

There is case for changing the percentage See below

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

Answer

It is currently the case that at whatever level affordable housing is triggered there is a tendency for development to be proposed just under that threshold. It would perhaps reduce this tendency if the affordable housing percentages increased gradually according to the size of the development.

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

Answer

If an edge of settlement site is suitable for affordable housing then it must also be suitable for market housing. Furthermore, estates of market housing must be pepper potted with affordable housing to get a good social balance. Surely it works the other way too.

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?

Answer

Why is this question a matter of choice? I see no reason why both provisions should not apply. The White Paper: Fixing the Broken Housing Market seeks to



diversify the market. Self-build and custom build housing are encouraged and this form of housing should form part of the assessment of settlement boundaries.

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

Answer

Paragraph 55 of the old NPPF and paragraph 79 of the 2018 NPPF make provision for this form of housing. The introduction of a policy to cover this may appear as an endorsement of a device to achieve housing in the countryside, which in reality should be only very rarely used.

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?

Answer

Early in this Issues and Options paper the fact that the population in Test Valley is ageing more quickly than the Hampshire average. The problems of an ageing population need to be addressed. Nationally it is estimated that by 2035 there will be over 100,000 people over 100 years of age. The Council should invest in suite of policies addressing the issues of the older people including specific allocations, or percentages of allocation. The policies could also include providing more bungalows and a more rigorous approach to providing homes for life.

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?

Answer

It is not realistic to rely on the market which is dominated by large national house builders. The White Paper: Fixing the Broken Housing Market seeks to diversify the market. This can only be achieved by appropriate planning policies.

Beyond the policy requirements for affordable housing, aged persons housing and wheel chair users the market should not be unduly restricted. A policy seeking a broad mix of housing types and sizes would bring some control without being too regulatory

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

Answer

The policies for replacement dwellings and extensions should be based upon appropriate criteria. Restrictions on sizes should only apply where there is an unacceptable impact upon the landscape or townscape.

While it is desirable to ensure that there is a pool of small dwellings this would best be achieved by the provision of more housing with an appropriate mix of sizes.

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

Answer

The existing approach as set out in paragraph 5.44 should be continued.

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

Answer

The nationally described space standards should be adopted.

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

Answer

A reasonable proportion of new dwellings should be included in larger schemes for wheel chair users.

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

Answer.

Yes. The existing definition.

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

Answer

None



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?

Answer

No. It is difficult to define a policy on health and wellbeing that is meaningful and deliverable in planning.

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

Answer

No. This is not practicable. The market will dictate what is viable.

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

Answer

No. See above.

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

Answer

You should allocate more land for employment, not for 'more choice and flexibility' per se but because you want Test Valley to be an economic success and because there is currently an outmigration of the population to employment in other districts.

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

Answer

The offer of smaller work places is a good idea for startup businesses.

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

Answer

Given that Test Valley has a large number of villages which are not particularly well served by public transport the concept of working from home must be considered



advantageous in the context of sustainability. The provision of high quality broadband is essential to enable people to work from home.

However, home working needs some form of control to ensure that the use does not give rise to unacceptable levels of deliveries, parking, noise etc.

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?

Answer

The high street is changing rapidly due to internet shopping and the planning system needs a more flexible approach. Whilst some flexibility within primary frontage may be acceptable it is important to keep the primary frontage vibrant and relevant to retailing. It is the secondary frontages and more peripheral areas that need to be addressed. These areas need to be moved out of retailing and perhaps to residential so that retailing is focused on the primary frontage.

Q30: How should we best continue seeking apprenticeships?

Answer

None

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

Answer

None

Q:32 Should there be measures to support tourism proposals, and if so, what?

Answer

None

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?

Answer



Local gap policies have been successfully challenged at Planning Inquiries. This is confusing for local residents who see it as an absolute restriction on development. It is desirable therefore to develop a more criteria based policy to address the issues of coalescence.

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

Answer

These designations should be left to Neighbourhood Plans. However the skill set of Neighbourhood Planning Teams is limited and it is essential that advice is provided by the District Council

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

Answer

Yes

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

Answer

If appropriate sites can be identified then these should be included in the new Plan. It would be preferable if householders were encouraged to ensure that their homes were well insulated and provided their own photovoltaic panels and communities considered ground source provision as well as wind turbines.

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

Answer

Areas of less landscape value.

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

Answer

Yes. This is essential.

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

Answer

This requires robust and clear policies supported by appropriate documentation. This could be the provision of a design guide, development briefs for specific areas and the engagement with neighbourhood planning.

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?

Answer

It is essential to examine existing provision when considering 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?

Answer

None

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

Answer

A more flexible approach needs to be given to the provision of open space for mitigation so perhaps a combination of the two approaches may be best.

Q43: Is there anything additional which the Council should be taking account of?

Answer

None

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

Answer

BJC

Increase the amount of housing in the villages most able to accommodate development particularly those close to main roads with the objective of improving the public transport links between the villages and the main towns.

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

Answer

Test Valley has been identified as being particularly dependent upon the car. Parking should be provided to meet needs and provide for some over flow/visitor parking. Parking needs to be proximate to each residence, visible if possible from the household but not prominent in the street scene. Parking courts are not generally favoured by residents. On plot parking seems to work well.

The Council could consider the use of car ports instead of single garages. This avoids garages becoming general storage areas in preference to a place to park the car.

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

Answer

The strategy for future development in the Borough now needs to focus on a more dispersed approach. There should be an examination of the villages and smaller settlements to see which would benefit from some new development.

The objectives should be to achieve a greater mix of housing sizes, types and tenures to encourage a greater diversification of populations within the villages. Growth of villages will help support facilities and services. Growth of settlements on main routes through the district will help maintain and improve the existing poor public transport links.

New development in the villages should accommodate small scale employment and new residential development including Self build and Custom build sites.

