

Planning Policy

From: Wright, Aaron <
Sent: 14 September 2018 10:14
To: Planning Policy
Cc: Goodwill, Stuart
Subject: Representation to issues and options consultation
Attachments: Representation to issues and options consultation.pdf

Dear Sir/Madam,

Please find attached our representation to the issues and options consultation for the next local plan.

Kind regards

Aaron Wright

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13/09/2019

ISSUES AND OPTIONS CONSULTATION ON THE NEXT LOCAL PLAN

Dear Sir/Madam,

Please find below responses to the questions set out in your "Issues and Options consultation for the next local plan".

Q4. Should the Local Plan's housing requirement be consistent with Governments standard methodology?

Do you have any evidence to support your view?

The Local Plan's housing requirements should be consistent with Governments standard methodology. This ensures that the Local Plan reflects up to date National Planning Guidance and Policies.

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

If Test Valley Borough Council is proposing economic growth, it is essential that the housing requirement be increased above SOAN to ensure it drives the economy. There is clear evidence that housing development has a positive impact on the economy. The measurable economic impacts of building new homes is to:

- boost jobs
- reduce benefit expenditure
- boost tax revenues
- reduce borrowing
- Impact positively on the growth of GDP
- Positively impact on economic confidence and potentially the cost of borrowing



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?

Given the challenges facing Local Authorities regarding housing deliveries and 5 year housing land supply it is considered that the LPA should retain control of delivery of key housing sites of 100 units in key settlements. Smaller allocations or allocation in smaller settlements where controlled growth should be encouraged, should be controlled through Neighbourhood plans.

Given the significant growth constraints facing the main settlements in both northern and southern Test Valley, serious thought should be given over this and the next plan period to support a New Village/Settlement. This would allow for significant infrastructure investment and a Garden Village approach and supported by Central Government.

The development of a new extended neighbourhood on the north-east of Romsey would be the logical next step in the organic growth of Romsey. The new neighbourhood would provide an opportunity to significantly boost the supply of market and affordable housing and delivering new physical and green infrastructure for the town. Growth in this location would complement the existing facilities at Ganger Farm and Abbotswood, and aid in their continued viability.

It would provide balance to the significant area of growth to the south of the town at Whitenap. The site has the potential to deliver circa 400 new homes with 40% affordable housing provision.

Appendices A and B below set out the two different approaches that could be taken with the site. The first approach would be a rounding off of the settlement with approximately 270 units. Alternatively the site could accommodate additional development to the south with a total of 400 new homes, but with the provision of a north/south road link from Winchester Road to Jermyn's Lane.

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

The settlement boundaries should be defined by the built edge of towns/villages. Where appropriate, settlement boundaries should include new developments which may have occurred recently or been granted planning permission. Allocations in Neighbourhood Development Plans for housing, employment or other uses should also be included within the boundary. The settlement boundaries should also be drawn to facilitate an appropriate level of proportional growth within the plan period.



If land within the boundary is not formally allocated, there will be a requirement to demonstrate that there is enough available capacity within the boundary to enable development to take place.

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

The provision of 40% affordable housing is considered an appropriate level for residential schemes. This level of provision does not affect the viability of a scheme.

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 be built?

The mix of private housing should be informed by developers and current market conditions. A Local Plan is only reviewed every 5 years and as such defining the mix and type of housing in a Local Plan, can result in out of date requirements that don't reflect currently market conditions.

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

Density standards should not be defined in a Local Plan. Densities should be determined on a site by site basis, with the character of an area influencing the density permitted. It is vital to make the best use of available sites and development opportunities. Design principles and densities should be justified in planning applications and Design Statements showing how the development maximises best use of land whilst having regard to site constraints and the character and appearance of the area.

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

The UK faces a significant and growing housing crisis. A failure to keep up with demand for new homes has driven up prices for homebuyers and created a critical shortage of social housing. The introduction of internal space standards will undermine choice of new homes for those making a choice between the amount of space they have *and what they can afford*. There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Council cannot simply expect home buyers to absorb extra costs in a Local Plan area where there exist severe affordability pressures.



There is also an impact of larger dwellings on land supply. The requirement for the nationally described space standard would reduce site yields or the number of units on a site. Therefore the amount of land needed to achieve the same number of units must be increased. The efficient use of land is less because development densities have been decreased. At the same time the infrastructure and regulatory burden on fewer units per site intensifies the challenge of meeting residual land values which determines whether or not land is released for development by a willing landowner especially in lower value areas and on brownfield sites. This may also undermine delivery of affordable housing whilst at the same time push additional families into affordable housing need because they can no longer afford to buy a nationally described space standard compliant home. The Council should undertake an assessment of these impacts.

It is also incumbent on the Council to provide a local assessment evidencing the specific case for Winchester which justifies the inclusion of the nationally described space standard as a Local Plan policy. Winchester City Council will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting appropriate policies in the Local Plans. National guidance states that where LPAs are to include these additional standards, they need to provide evidence to justify why this is considered necessary. The impact of adopting the space standard should be considered as part of a plan's viability assessment.

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

Test Valley Borough Council will need to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. This should be based on a housing needs assessment and the following criteria should be taken into account:

- the likely future need for housing for older and disabled people (including wheelchair user dwellings).
- size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
- the accessibility and adaptability of existing housing stock.
- how needs vary across different housing tenures.
- the overall impact on viability.

Q33. Should we continue to retain the principle of Local Gaps? Should we define specific boundaries or a more general policy aims to avoid coalescence?



Yes, Test Valley Borough Council should retain Local Gaps where it can be demonstrated coalescence will harm the character and identity of settlements.

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

This should be undertaken via Neighbourhood Plans.

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

The most appropriate way to encourage energy efficient is through a 'fabric first' approach. This means the building does the work, rather than relying on bolt-on renewable energy devices, like solar panels and ground-source heat-pumps. A fabric first approach prioritises design and construction that minimises the need for heating and cooling. Many customers prefer not to have solar panels due to maintenance issues, and these can be unsightly. A fabric first approach is considered the most effective and efficient way to reduce energy efficiency in new homes.

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

Parking standards should be included within the Local Plan defining the following:

- Minimum parking standards per dwelling size
- Visitor parking numbers and their formality
- Parking and garage dimensions
- Acceptability of varying parking provisions – on plot, on-street, courtyard, garaging, allocated and unallocated

Care should be taken to ensure that parking provisions do not result in a parking dominated street-scape.

Please contact if you would like further clarification on the information provided.

Yours sincerely,

Planning Manager



Ganger Farm Phase 2 – Northern approach





Ganger Farm Phase 2 – Combined Approach



