

Planning Policy

From: Massie, Neil
Sent: 14 September 2018 10:45
To: Planning Policy
Cc: Planning Consultations
Subject: Test valley Borough Cocouncil - Issues and Options consultation for the next Local Plan until 2036
Attachments: TVBC Issues and Options consultation for the next Local Plan until 2036 - HCC Response September 2018_(HF000017317735).docx

Dear Sir / Madam,

Please find attached the comments of Hampshire County Council on the above Local Plan consultation document. Hopefully all is self-explanatory. If, however, you require any further clarification or information, please do not hesitate to contact me.

Yours faithfully

Neil

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Principal Planning Policy Officer

Strategic Planning



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<p>TVBC Issues and Options Consultation for the next Local Plan until 2036 Hampshire County Council Response – September 2018</p>	<p>Subject / Theme Site / Policy Question</p> <p>Hampshire Minerals and Waste Plan</p>	<p>Object / Support / Comments Reasons (Including Proposed Changes / Amendments)</p> <p>Hampshire County Council as the Minerals and Waste Planning Authority has a general comment to make at this early stage of plan making. It would be helpful to show how the plan documents provide the planning policy for the area. At the moment, there is no reference to the Hampshire Minerals and Waste Plan as part of local plan policy in Test Valley, so if someone were to read these Local Plan documents in isolation they would be unaware of the link. It would therefore be beneficial to include some information or a figure to illustrate how the documents sit alongside each other as part of local planning policy.</p>
<p>Waste & Resource Management</p>	<p>In preparation for the Borough Councils next Local Plan the County Council would like to provide the below information to provide context to the current position with regards to waste and resource management. It is recognised that individual pockets of development may not have a significant impact on waste management infrastructure but when considered in terms of the development across the borough, and indeed Hampshire as a whole, the impact is significant. The waste disposal infrastructure provided by the County Council is done so on a regional basis. Whilst there is energy recovery, composting and recycling infrastructure within the region, these facilities receive material from across much of County and as such capacity is not considered on an individual district or borough basis.</p> <p>Due to continued waste growth and housing development across the region these facilities are under increasing pressure in terms of their capacity. Each property that is developed creates just over one tonne of waste each year, approximately two thirds of which is kerbside residual waste. In Hampshire, the County Council is currently seeing a growth in the amount of waste each household is generating and this is forecast to continue for the foreseeable future. It should not be assumed that the existing infrastructure is sufficient to deal with the additional waste generated by the proposed developments.</p> <p>Whilst a programme of waste prevention is in place to try to mitigate the increase in waste that comes as a result of development and overall waste growth, it does not remove the issue entirely and there is constant pressure on the capacity available for processing household waste at the existing infrastructure. Increases in housing, no matter how limited, all contribute to increasing this pressure and lead to the need to consider additional capacity which comes at a considerable cost.</p> <p>The Circular Economy package that was approved by the EU sets ambitious targets for recycling of 65%</p>	

	<p>2035. Despite the recent vote to leave the EU, the UK Government voted in favour of the CE package and it will therefore be transposed into UK law. Hampshire, currently, has a recycling rate of about 40% and in order to even begin to move towards this higher target there would need to be a significant change, and therefore investment, in the approach to waste management.</p> <p>The County Council is engaged in a programme of work that aims to deliver a significant performance improvement across Hampshire by working in much closer partnership with all local authorities on a whole systems costs approach. This improvement will require both the systems and the infrastructure to change and will also need to the supporting resources and communications to ensure that it is embedded. There are currently two Household Waste Recycling Centres (HWRCs) in Test Valley, both of which have had investment in the last 10 years, a large split level site in Andover and a small single level site in Casbrook near Romsey. As a result of ongoing central government funding reductions and the pressure of increased demand across Council services the HWRC service has been the subject of review. There have been reductions in opening hours, charges introduced for non household wastes and a commercial waste service introduced all to reduce the cost of service provision. It is expected that as part of the continuing financial pressures this service will be subject to further review over the coming 12-24 months.</p> <p>The County Council is in the process of revising its Strategic Infrastructure Statement that highlights the areas of pressure and need for all services including waste management.</p>
<p>Flood and Water Management</p>	<p>Issues and Options consultation is only the first stage in the preparation process, with further opportunities to comment during later stages.</p> <p>At the Issues and Options stage flood risk is not highlighted as an issue as part of the discussion for example under future housing in the borough. Whilst I am confident that flood risk management will be addressed as part of the subsequent consultation on Preferred Options (Regulation 18 stage), it nevertheless may be worthwhile reminding the Council that under the Flood and Water Management Act 2010, Hampshire County Council as a Lead Local Flood Authority (LLFA), is responsible for preparing a Local Flood Risk Management Strategy (LFRMS). This provides a high level county-wide assessment of flood risk across Hampshire. An objective of the LFRMS is to ensure that local planning authorities take full account of flood risk when allocating land and considering permitting development (by avoiding development in inappropriate locations and minimising flood risk wherever possible). Consequently, LPAs and developers are advised to also have regard to the strategy.</p> <p>The County Council adopted its LFRMS in July 2013 and the plan can be viewed on the County Councils website at:</p>

	<p>http://www3.hants.gov.uk/flooding/hampshireflooding/floodriskstrategy.htm</p> <p>The County Council is reviewing its LFRMS, and this is expected to be published for consultation by the end of this year.</p>
<p>Question 15: Should the Council change its approach and set out a requirement that certain sites should provide for the needs of elderly people given that the Borough has an ageing population as described at paragraph 3.3. Similarly the County Council would support a requirement for more supported housing for those with disabilities and/or are socially excluded?</p> <p>Question 16: 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?</p>	<p>Hampshire County Council Adult Services would support the suggestion that Test Valley Borough Council change its approach and set out a requirement that certain sites should provide for the housing needs of certain groups, in particular the needs of elderly people given that the Borough has an ageing population as described at paragraph 3.3. Similarly the County Council would support a requirement for more supported housing for those with disabilities and/or are socially excluded.</p> <p>Hampshire County Council Adult Services would support a new policy that requires a mix and type of housing to be stated in the Local Plan rather than the housing market inform what mix and type of housing to build. With regard to housing for an ageing population the County Council would support the need for more extra care housing built at a demand norm of 20 such apartments per 1000 people aged 75 and over.</p>
<p>Question 24: Should some types of facilities and services be given more protection than others?</p> <p>Question 25: Should we continue to protect all existing community facilities and services?</p>	<p>Hampshire County Council (HCC) Library Service in its role as a public service provider has an on-going responsibility for the review of the library services it delivers as part of its <i>Library Service Transformation Strategy 2016 to 2020</i> to improve its service offer to the local community and residents of Hampshire. HCC Library Services currently has two libraries within Test Valley; Andover Library and Romsey Library. Andover Library is categorised as a Tier 1 Library, Tier 1 being the largest and busiest Libraries, providing widest range of services. Romsey Library is a Tier 2 Library, usually found within a medium-sized town. The different Tiers of library and the services they provide could be found in the link here:</p> <p>http://documents.hants.gov.uk/libraries/LibraryServiceTransformationStrategyto2020ApprovedVersion.pdf</p> <p>The <i>HCC Library Service Transformation Strategy to 2020</i> sets out the challenges, considerations and direction of travel during the period from 2016 to 2020 that will ensure the library service is sustainable and relevant to the changing needs of customer's demands. HCC Library Service aspires to adhere to the <i>Core Offers of Libraries</i> set out by the Society of Chief Librarians, which includes the offers of reading, information, digital, health, culture and learning. This means that as part of the Transformation Strategy, HCC Library Service will potentially explore new service delivery models with the concepts such as <i>cohabitations</i> and <i>diversifications</i> that offer a range of services at one service location or through joint service provision with partner organisations. Gosport Discovery Centre is a successful example of the</p>

	<p>delivery of the two concepts, which there is a combination of different services, including a library that is provided at one Community Hub location.</p> <p>HCC Library Service considers these approaches more economically sustainable and effective. In relation to these aspirations, an approach to highlight in the Transformation Strategy is to share library buildings with partner organisations for several services to be accessed to one visit. Through this approach, HCC Library Service will have lower building running costs by sharing with other partner organisations and also fulfil the objectives to provide diversified and improved library services. On this basis, the Transformation Strategy could potentially involve the relocation and/or re-provision of services to an alternative location to continue to meet operational needs and may also necessitate the rationalisation of surplus facilities and/or disposals, by reinvesting the proceeds of sale to support the deliverability of such re-provision (if required during the Plan period). This approach is supported by Circular 06/03: Local Government Act 1972 General Disposal Consent (England) 2003 – “best consideration for the disposal of land”.</p> <p>As part of its <i>Library Service Transformation Strategy 2016 to 2020</i>, HCC as a Library Service supports the intentions of the Borough Council's policy position which asks whether public library services should continue to be protected for the benefits of local communities. However, the current position of the adopted Policy COM14 is not effective in recognising the role of public services and how they function. The requirement for a 6-month marketing assessment to prove that a facility is surplus to requirements can be inappropriate and impose unnecessary delay in securing much-needed funding for public services.</p> <p>In its role as a public service provider and duty to co-operate body, HCC would recommend that appropriate flexibility is given to public service provider such as the County Council (including the loss or disposal of a facility no longer needed) in order to facilitate any operational service changes to the libraries within Test Valley that may be required during the Plan period to 2036 as part of HCC's transformation strategy to distinguish between commercially-run and publicly-owned or managed community facilities.</p> <p>It is noted that Development Management Policy SD43: New and existing community facilities (2) in the Pre-Submission South Downs Local Plan recognises the difference between commercial and public facilities and requires a marketing exercise only for the former. It is suggested that any emerging Community Services and Facility Policy in the next Test Valley Borough Council (TVBC) Local Plan should adopt a similar approach. This is in order to be effective in line with the duty to co-operate (Localism Act 2011) placed on TVBC to respond to the operational needs of the County Council as a public service provider that influences the nature of places.</p>
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