

Planning Policy

From: Doug Cramond <doug@cramond.co.uk>
Sent: 14 September 2018 11:04
To: Planning Policy
Subject: Issues and Options Consultation for the next Local Plan
Attachments: IOC Comments Ashfield Estate 14.9.18.doc; IOC Comments Ashfield Estate 14.9.18.pdf

Dear Planning Policy Team,

In response to the above please see comments on behalf of The Ashfield Estate.

I trust they are self explanatory and we look forward to further engagement and dialogue.

I have included PDF and Word versions which may help processing.

Please acknowledge receipt.

Yours faithfully

Doug Cramond

DC Planning Ltd



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14 September 2018

Planning Policy
 Test Valley Borough Council
 Beech Hurst
 Weyhill Road
 Andover SP10 3AJ

Dear Planning Policy Team,

**Issues and Options Consultation for the next Local Plan
 Response on behalf of The Ashfield Estate**

The Ashfield Estate is pleased to see the publication of the Issues and Options Consultation for the next Local Plan (IOC) which provides an extremely interesting background analysis of population, housing, economy and education and the like as well as raising some very pertinent questions which aim to shape the emerging Local Plan (LP).

The Estate, as one of the four parties, is obviously signed up to the response to the IOC provided by WYG on behalf of the Ashfield Partnership. Primarily this was made in the context of the existing LP allocation for Whitenap and there is no need for repetition of its points here.

Looking at a small number of headings the Estate would comment in its own right on the IOC as follows:

General Strategy & Approach

The recent NPPF, published just after the IOC, makes it clear that Strategic Policies relating to a range of matters such as housing, employment, infrastructure, community facilities and environmental enhancement need to be incorporated into a LP and that they should endure for a minimum of 15 years post adoption. This is the first point to make regarding the forthcoming LP; it needs to be visionary and comprehensive. It has to consider how settlements can and should grow sustainably and how hinterlands can serve the population more effectively. This means there will be sizeable areas of land to be subject to change in the plan period. The Estate would be keen to enter dialogue on this issue to ascertain whether it can assist with the Council's objectives and obligations.

Housing

The recent Government Methodology (Q4) has to be the starting point for Housing Supply as a minimum numerically. The minimum should certainly not be taken as a ceiling as there is every logic in exceeding this to support economic growth (Q5). This in turn should help balance the population components (presently 'over-aged' as an average as highlighted in the IOC), lessen the outward commuting which is identified, and increase the scope for sustainable travel generally.

Extreme caution should be taken if the planning authority is seriously considering a move to housing growth around the remoter parishes and smaller villages. As the IOC itself says (5.17) "the current development strategy is to concentrate development to existing main settlements where services and jobs are most accessible. This approach limits development in the less sustainable villages of the Borough" (our underlining). It is hard to see why there

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would be any sound planning reason to move away from this strategy. The authority should use Local Plan Allocations (Q8) based on sustainability and accessibility analysis.

Affordable housing should be maintained as a priority albeit with necessary flexibility over percentages (Q10) and the Council need not and should not get overly involved in market house types, mix or sizes (Q15/16).

There is a common myth in 5.42 that higher densities would necessarily give rise to poorly designed areas. Certainly there are some examples of that but these stem from mis-guided developers and, at times, unfortunate Council or Inspector decisions. Density controls should not feature in a LP (Q18). Equally there is no need for housing standards to feature on a local basis beyond those set at national level (Q19/20).

Employment

Requirements for employment provision need to be informed by study. There is simply not the evidence presently to assess the quantum or type of sites and buildings required (Q26/27); this needs further work. It is apparent however that sheer floorspace / hectare amounts on average per job has declined markedly over the last 10 years. Clearly for well-rehearsed environmental, social and economic reasons, every encouragement should be given to people to work from home (Q28)

Countryside

In terms of any 'Green' allocations or annotations the Estate would make the plea to keep it simple. There is no need for multi-layered constraints in the countryside (Q33/34) to suitably manage development. What should be done is energy spent creatively to look at how settlements may be linked across countryside (Q44). Similarly rather than one size fits all the authorities should be creative in use, content and appearance with Public Open Space (Q40) and SANG. The latter should certainly stay as a concept in the emerging LP rather than a complete move to specifically allocated mitigation areas (Q42).

Design

The Estate would make the plea to improve quality by being more aspirational at policy formulation and particularly at planning application assessment stage. The new NPPF paras 124-132 underline this as never before. Additional emphasis must be given to achieving good design. Embodied in this would of course be sensible, well-used, planned parking provision with no need for a formulaic approach (Q45). At the same time the Council could aim to embrace ideas such as the environmental growth agenda, great place-making through good street design, engendering of civic pride, connectivity and inclusion of host communities, mixed uses contributing towards lively and attractive communities, and possibly engendering a close relationship between new development and sustainable food and farming.

In all the circumstances the Estate very much looks forward to being a part of the emerging Local Plan review process and would be pleased to assist the Council in practical terms with its principal vision (4.1): "to create a Test Valley community where everyone has the opportunity to fulfil their potential and enjoy a good quality of life".

Yours faithfully

Director