

Planning Policy

From: Ian Johnson <[redacted]>
Sent: 14 September 2018 13:08
To: Planning Policy
Cc: Steve Culpitt; Lucy Hill; Natalie Fellows
Subject: Test Valley Local Plan Issues and Options Consultation - Housing Distribution
Attachments: Reg 18 I&O Representations - Housing Distributionv2.pdf

Dear Planning Policy

Please find attached representations to the Issues and Options Consultation Document, submitted on behalf of our client Seaward Properties Ltd.

Please would you confirm receipt of this email.

Regards

Ian

Managing Director

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Luken Beck



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

14th September 2018

Our Ref: 14011

Your Ref:

by email only

Dear Sir / Madam

REPRESENTATIONS TO THE TEST VALLEY LOCAL PLAN ISSUES AND OPTIONS CONSULTATION: PROPOSED ALTERATION TO SETTLEMENT BOUNDARY AND RESIDENTIAL SITE ALLOCATION IN LOCKERLEY

The purpose of this letter is to provide representations on behalf of our client, Seaward Properties Ltd, to the Test Valley Local Plan 'Issues and Options' consultation document and in particular to the sections 'What Options Do We Have For Distributing Development?' and 'Settlement Boundaries' and related Questions 8 and 9 (Pages 17 and 18). Please find appended to this letter an extract from Inset Map 31 (Lockerley)¹ showing a proposed extension to the Settlement Boundary for Lockerley so as to include the Land at Coombs Meadow, Lockerley Road, Lockerley.

These representations are prepared in the context of Paragraphs 11 and 67 of the National Planning Policy Framework 2018 (NPPF), which state,

'Plans and decisions should apply a presumption in favour of sustainable development.'

For **plan-making** this means that:

a) *plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*²

(Paragraph 11, NPPF 2018)

'Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Planning policies should identify a supply of:

a) *specific, deliverable sites for years one to five of the plan period; and*

b) *specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan.'*

(Paragraph 67, NPPF 2018)

Q8: DO YOU HAVE ANY COMMENTS ON THE APPROACH SUGGESTED?

The Council's review of the Adopted Local Plan housing strategy and the potential of the rural settlements to provide locations for future development is supported. A housing distribution strategy based on dispersal, rather than concentration around Andover and Romsey is more likely to support the rural economy, key local services, reduce trips and enable people to live in their existing communities. We reserve the right to comment further

¹ Adopted Test Valley Borough Revised Local Plan (2011-2029)

on whether this is best achieved through a proportionate distribution to the Parishes or through Local Plan Allocations, until further detail is provided.

In order to achieve consistency with the policies of the NPPF and therefore meet the NPPF test of 'soundness'² the distribution strategy within the emerging Local Plan should take into account the NPPF definition of 'deliverable' and guidance provided within the National Planning Practice Guidance, 6th March 2014 (NPPG) relating to the 'suitability' of land for housing, which state,

'Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.'

(Glossary, NPPF)

'...the following factors should be considered to assess a site's suitability for development now or in the future:

- *physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination;*
- *potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation;*
- *appropriateness and likely market attractiveness for the type of development proposed;*
- *contribution to regeneration priority areas;*
- *environmental/amenity impacts experienced by would be occupiers and neighbouring areas.*

(Methodology - Stage 2: Site Broad Location Assessment, Paragraph: 019 Reference ID: 3-019-20140306, NPPG)

Q9: HOW SHOULD THE SETTLEMENT BOUNDARIES BE DEFINED IN THE NEXT LOCAL PLAN?

The approach towards focusing growth within the existing settlements through the use of settlement boundaries is supported. This approach protects the countryside from inappropriate development, provides certainty for developers and landowners and helps supply a mix of housing to support local communities and key services and facilities (i.e. schools, convenience stores, surgeries, employment, bus services), especially in the rural settlements. This approach is consistent with Paragraph 68 of the NPPF which recognises the important role of small and medium size sites (including windfall sites) in meeting housing requirements and their potential to deliver development quickly.

In order for the Borough to meet its future development needs it is also important to avoid drawing the boundaries too tightly around the settlements. The physical limits for the Borough's settlements should include land in 'suitable' locations that can be made available for specific land-uses and that is achievable within the Plan period.

Land at Coombs Meadow, Lockerley Road, Lockerley – A Suitable Location for Growth

For the reasons set out below the proposed site allocation on the Land at Coombs Meadow, Lockerley Road, Lockerley shown in the appended plan is considered to represent a 'suitable' location for housing and logical alteration to the settlement boundary for Lockerley. Lockerley is considered to be one of the Borough's more sustainable rural settlements.

Site and Surrounding Area

The site (1.3ha) adjoins the northern edge of Lockerley, adjacent to the existing residential area, community facilities (such as primary school, village hall and adjacent open space) and a garage to the south. It is located

² Paragraph 35, NPPF

approximately 2.5km from Mottisfont and Durbridge Railway Station. The site currently comprises of a single agricultural field, to be considered of low agricultural value. The natural topography of the site is relatively flat.

The site is enclosed to the north by the railway line embankment (Romsey to Salisbury Railway Line) and to the south by a Lockerley C of E Primary School playing field and residential curtilages. The eastern boundary comprises a well-established hedgerow, with agricultural fields beyond. A safe and convenient vehicular access can be provided onto Lockerley Road.

The site is not within an area designated for high or medium flood risk, landscape sensitivity or historic significance and does not include heritage assets within its boundary. It is also not within, or adjacent to, a site of international, national or local ecological importance.

Development Capacity

The site was put forward for inclusion within the Strategic Housing and Economic Land Availability Assessment (SHELAA, 2017). The site was also considered in the previous SHELAA as part of the Northern Test Valley Rural Sites (ref. SHELAA166). The overall assessment of 25 dwellings was found to be suitable, achievable and deliverable.

Allocation of the site within the emerging Local Plan would provide an opportunity to help meet the housing needs of rural Test Valley in a 'suitable' location. A housing allocation in this location would maintain and enhance the sustainability of Lockerley and is a logical extension to the settlement boundary. The allocation would be well contained in the wider landscape due to existing mature vegetation which can be strengthened and the presence of the railway embankment to the north.

Summary

This proposed allocation is considered to be consistent with the aims of the NPPF and National Planning Practice Guidance, 6th March 2014 (NPPG) relating to the 'suitability' of land for housing. The points below summarise how the site responds to the guidance:

- There are no known physical limitations or problems of access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination on the site.
- Potential impacts on the general landscape character would be very limited due to the sounding development. Impacts on biodiversity and conservation are not considered likely to be significant.
- A development comprising a mix of market and affordable dwellings in this location would provide a valuable contribution towards meeting local housing requirements in a rural settlement that is suitable for modest growth.
- Impacts on the amenity of neighbouring areas would not be significant, subject to development coming forwards in accordance with the wider policies of the emerging Plan and the NPPF.

We appreciate the opportunity to comment on the 'Issues and Options' and respectfully request the Council support this proposed allocation and alteration to the settlement boundary in order to help accommodate the Borough's housing need over the Plan period.

Yours sincerely

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Managing Director

Email

cc.

Appendix 1: Proposed Alteration to Settlement Boundary for Lockerley and Residential Site Allocation



-  Proposed boundary realignment
-  Proposed Site Allocation



-  Settlement Boundary (Policy COM2)
-  Conservation Areas (Policy E9)
-  Countryside (Policy COM2)
-  Local Gap (Policy E3)
-  Sites of Importance for Nature Conservation (Policy E5)