

Planning Policy

From: jeremy.gardiner
Sent: 14 September 2018 13:28
To: Planning Policy
Subject: Local Plan Issues and Options Consultation - representations on behalf of the Ashfield Partnership
Attachments: Ashfield Partnership TVBC Issues and Options Representation 14Sep18.pdf
Importance: High

Dear Sir or Madam,

Please find attached representations which we submit on behalf of the Ashfield Partnership.

Yours faithfully,

Jeremy Gardiner
Head of Southampton Planning

Ref. HP17043

WYG

Tel:
Mob:

www.wyg.com

WYG Environment Planning Transport Limited. Registered in England number:

3050297.

Registered Office:

2UJ. VAT No: 431-0326-08.



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Whitenap, Romsey
Formal representation on the Test Valley Borough Council Issues and
Options Consultation (July 2018)



1.0 Introduction and Background

1.1 WYG Planning and Transport has been instructed by the Ashfield Partnership to submit representations on the Test Valley Borough Council Issues and Options Consultation for the next Local Plan.

1.2 The Ashfield Partnership owns the Whitenap site in Romsey. The Whitenap site is subject to two existing site allocation policies within the adopted Test Valley Local Plan 2011 – 2029.

1.3 Policy COM3 relates to a new neighbourhood at Whitenap, Romsey incorporating the following:

- Approximately 1,300 dwellings including affordable housing provision;
- Community and education facilities;
- Public open space;
- Landscaping;
- Retention and enhancement of Beggarspath Wood;
- New vehicular, pedestrian and cycle access;
- Off site improvements to the transport network; and
- 8.0 hectares of land per 1,000 population at Beggarspath Wood and Luzborough Plantation to provide mitigation for sites of European Importance.

1.4 Policy LE3 relates to employment uses in conjunction with the new neighbourhood that is subject to COM3 and incorporates the following:

- Approximately 6 hectares of land for employment (Class B1 and B2) focussed predominantly at the southern end of the site;
- Landscaping to complement the new neighbourhood including a 10m belt between residential and employment uses;
- New vehicular, pedestrian and cycle access; and
- Off site improvements to the transport network.



1.5 The following paragraphs provide a response on the key topics discussed in the Issues and Options document that are relevant to the Whitenap site.

2.0 Living in Test Valley

2.1 Chapter 5 of the Issues and Options consultation document refers to living in Test Valley and deals predominantly with providing the right number of homes in the right location. It seeks to meet the objectively assessed housing needs of the Borough and advises that a local housing target will be identified in line with the standard methodology within the now published NPPF (July 2018). The introduction of a new standard housing need methodology is one of the central reforms in the Government's revised National Planning Policy Framework (NPPF). However, there has been concern that the methodology's use of the 2016 - based Household Population Projections will indicate a much lower level of household formation when these projections are published in September. This has prompted the Government to announce that it will consider revising the standard methodology to ensure that England's provisional target of 300,000 homes a year can still be met. The emerging Local Plan should take any such revised methodology into account.

2.2 The adopted Test Valley Local Plan includes a figure of 10,584 homes to be provided between 2016 and 2029 (588 per year), 3,492 within Southern Test Valley (194 per year). Adopted policy COM3 seeks to contribute to the achievement of this target by allocating the Whitenap site for approximately 1,300 dwellings.

2.3 Paragraph 5.9 of the Issues and Options report focusses on the approach of the existing Local Plan which seeks to focus new growth around the largest settlements in the borough, including Romsey, as these benefit from the greatest range of services and facilities. It advises that the new Local Plan needs to consider whether this is the correct approach moving forwards and suggests the following options at paragraph 5.19 – 5.26:

- Community led distribution giving Parish Councils a greater role in planning;
- Proportionate distribution to Parishes with the housing requirement distributed amongst the main settlements on a pro-rata basis;

Whitenap, Romsey
Formal representation on the Test Valley Borough Council Issues and
Options Consultation (July 2018)



- Local plan allocations with the Council deciding which are the most appropriate locations for housing and additional small amounts of housing coming forwards through windfall sites;
- New village allowing for new communities to deliver significant new housing; and
- A mixed approach incorporating a combination of the above.

2.4 Q8 on page 18 asks: *'Do you have any comments on the approaches suggested above?'*

2.5 As highlighted previously, the Whitenap site forms an existing housing allocation within the Test Valley Local Plan 2011 – 2029, fitting into the 'Local Plan Allocations' category referred to above. **The allocation of this site for the development of a new neighbourhood should be carried forward into the new Local Plan.** The preparation of a suite of studies which will inform the preparation of outline planning application proposals for the Whitenap site, which is occurring at the same time as the early stages of the Local Plan review, presents the opportunity for the Council and the Ashfield Partnership to review together the detailed policy context for the delivery of the development. The potential of the site to make a significant contribution to housing delivery in the borough remains and since the relatively recent adoption of the Test Valley Local Plan in January 2016, preparatory work has been undertaken by the Ashfield Partnership to facilitate the delivery of a new neighbourhood at Whitenap, in accordance with adopted policy.

2.6 In addition to discussing future housing provision and allocation, the Issues and Options document also seeks views on establishing technical standards for housing proposals. The following questions are relevant to this:

Q13, page 19: *'How should we meet the requirement for Self-Build plots? Should it be as part of sites over a certain threshold or separate sites?'*

Q15, page 19: *'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?'*



Q16, page 19: *'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?'*

Q18, Page 20: *'Should the Council establish density standards in the Local Plan?'*

Q19, Page 20: *'Do you think we should establish internal space standards for future homes?'*

- 2.7 The Council should not seek to impose overly prescriptive policies relating to matters which affect the development design process - such as those relating to self-build homes, mix and type of housing, density, internal space standards, open space standards, the use of materials, highway layouts and adoption standards. Doing this could place an unnecessary burden on developers, encouraging an inflexible approach that impacts on the delivery of mixed and balanced communities, particularly on large strategic sites such as Whitenap where, if introduced, thresholds are likely to be exceeded. A standardised, prescriptive approach is not conducive to great place-making, and the revised NPPF's greater emphasis on achieving good design suggests that this is a subject which the Council and the Ashfield Partnership should review together.
- 2.8 Whilst it is understood that there is a requirement to provide affordable housing in existing planning policies and that this is likely to be carried forward into the new Local Plan due to affordable housing need, the Council should not stipulate the type of market housing that should be provided on development sites. Each site is unique and for this reason, it is not appropriate to apply standard thresholds throughout the borough. A flexible approach, with detailed housing mix determined following a consideration of the character and housing needs of the local area, should instead be adopted in order to deliver development that is sympathetic to local character and results in the efficient use of land.
- 2.9 With regards to the provision of self-build homes, this should not be insisted upon if there is not an aspiration by a developer to provide this on site. Doing so would be unreasonable and could result in additional delays to housing delivery.



3.0 Working in Test Valley

- 3.1 Chapter 6 of the Issues and Options consultation document refers to working in Test Valley and seeks to secure additional employment opportunities in order to strengthen the local economy.
- 3.2 The adopted Test Valley Local Plan allocates 6 hectares of employment land on the Whitenap site under policy LE3. This is intended to complement and enhance the new neighbourhood allocated under policy COM3.
- 3.3 Paragraph 6.4 of the Issues and Options consultation document advises that strategic employment allocations are included within the existing Local Plan, intended to provide protection from redevelopment and to deliver much needed employment uses in the best possible location. It advises that the Council will need to consider whether these areas are the correct ones to protect moving forwards. The delivery of employment on the Whitenap site will be addressed through the future planning application process.
- 3.4 Q26 on page 22 asks: *'Should we allocate more land to enable more choice and flexibility to the market?'*
- 3.5 **The provision of employment development as part of the allocation of the Whitenap site for the development of a new neighbourhood should be carried forward into the new Local Plan.** The preparation of a suite of studies which will inform the preparation of outline planning application proposals for the Whitenap site, which is occurring at the same time as the early stages of the Local Plan review, presents the opportunity for the Council and the Ashfield Partnership to review together the detailed policy context for the delivery of the development. It is intended that employment uses will be delivered as part of the planned new neighbourhood at Whitenap. As with the residential element, the potential contribution of this site to the delivery of employment land and employment opportunities continues to be significant.



3.6 Adopted Policy LE3 allocates 6ha of land at Whitenap for the delivery of employment uses "located predominantly at the southern end of the site" and to be separated from residential uses by a 10m landscaped buffer. This previous approach of "zoning" and segregating land for employment uses should be reviewed by the Council and the Ashfield Partnership together. Elsewhere, well designed and liveable schemes have distributed appropriate employment uses within residential areas, rather than segregating them, and it may be that lessons can be learnt from such good practice in the design of the development at Whitenap.

4.0 Enjoying Test Valley

4.1 Chapter 7 of the Issues and Options consultation document seeks to support biodiversity and enhance the landscape. It acknowledges that the countryside and the rural economy has a social and economic function and also highlights its key role in providing leisure opportunities for residents.

4.2 Paragraphs 7.21 – 7.24 relate to public open space and advise that the borough is well served by indoor and outdoor leisure facilities. The delivery of sports facilities at Picket Twenty, Andover and Ganger Farm, Romsey are currently underway and will help to meet local demand in the future. These paragraphs highlight the need for the new Local Plan to include a review of future requirements for sports provision. The following questions are relevant to this:

Q40 on page 27: *'Should the local plan be specific on the type of open space to provide or should it take account of existing provision / future requirements?'*

Q41 on page 27: *'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?'*

4.2 Policy COM3 advises that open space provision on the Whitenap site should accord with policy LHW1 (Public Open Space) which sets open space standards according to the projected increase in population associated with individual developments. The way



in which open space is delivered to serve the new residential population of Whitenap is another matter which the Council and the Ashfield Partnership should review together, due to the unique opportunities presented by the Ashfield Estate, of which the Whitenap site forms a part. This should include a consideration of the relationship between the development and the Estate hinterland, and the opportunities that this presents to design and deliver a very special place.

4.3 With regards to biodiversity, Q42 on page 28 asks: *'Should alternative open space for mitigation be provided as part of new developments or should land be specifically allocated, or a combination?'*

4.4 Policy COM3 incorporates a requirement to provide 8.0 ha per 1,000 population of SANG land at Beggarspath Wood and Luzborough Plantation to provide mitigation in relation to sites of European importance. It remains the Ashfield Partnership's intention to deliver land for SANG as required by adopted policy, but as suggested above in relation to open space provision, the Council and the Ashfield Partnership should take the opportunity to review together the way in which SANG land is to be delivered in association with the development of Whitenap, given the unique opportunities presented by the wider Estate.

4.5 The Ashfield Partnership is also mindful of the Court of Justice of the European Union judgement in the People over Wind and Peter Sweetman v Coillte Teoranta, case C-323/17 (the CJEU) (the "People over Wind" judgement), which was issued on 12 April 2018. That is because, given that the proposed development (either alone or in combination with other plans or projects) may have a significant effect upon the sites of European importance in relation to recreational disturbance, this judgement confirms the need to undertake an Appropriate Assessment (AA) which does not take account of measures intended to avoid or reduce harmful effects of a plan or project on a site of European importance at the screening stage.

5.0 Conclusion

5.1 This representation has been prepared by WYG Planning and Transport on behalf of the Ashfield Partnership, which owns the Whitenap site in Romsey.

Whitenap, Romsey

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5.2 We request that the comments made in this representation are fully taken into account to inform the next stages of the Local Plan review process.