

Planning Policy

From: James Iles <james@pv-projects.co.uk>
Sent: 14 September 2018 13:40
To: Planning Policy
Subject: Local Plan Review - Issues and Options - Rowles Family
Attachments: 50057_Mr_Rowles_Representation_140918.pdf

Dear Planning Policy Team,

Please find enclosed a representation on the Issues and Options consultation on behalf of the Rowles family.

I would be grateful if you would confirm receipt.

Many thanks,
James

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Planning Director

PRO VISION
PLANNING | ARCHITECTURE | URBAN DESIGN

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TEST VALLEY LOCAL PLAN REVIEW ISSUES & OPTIONS

Representations

September 2018

Prepared by Pro Vision on behalf of The Rowles Family

September 2018



TEST VALLEY LOCAL PLAN REVIEW ISSUES & OPTIONS
REPRESENTATIONS
PROJECT NO. 50057

PREPARED BY:
JAMES ILES MRTPI
PLANNING DIRECTOR

DATE:
SEPTEMBER 2018

PRO VISION

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Appendix A: Sketch site plan (Drawing 50057 SK1-02).

1.0 Introduction

- 1.1 This representation is made by Pro Vision on behalf of the Rowles family on the Issues & Options consultation.
- 1.2 The Rowles family is promoting land in its ownership at Dunkirt Lane, Abbots Ann and therefore wishes to comment on the Council's options for the rural area (Questions 3, 7, 8 and 9).
- 1.3 The land is promoted through the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA), identified as "Site 190: Land south east of Dunkirt Lane"¹. Further comment on the SHELAA is made in section 3.
- 1.4 In summary, the proposed review of the strategy for the rural area, as part of the review of how to distribute development over the plan period, is supported and is necessary to ensure the Local Plan is in accordance with national policy and guidance.

¹ Test Valley Strategic Housing and Economic Land Availability Assessment, 2017 (Final Version, February 2018).

2.0 'Where should the growth go?'

- 2.1 Planning to meet the Objectively Assessed Need (OAN) in accordance with the revised National Planning Policy Framework (NPPF) will inevitably require further growth in the rural areas over the plan period, which form the majority of the district. Growth is also needed in the rural areas to support and sustain rural facilities and services.
- 2.2 It is appropriate that the Issues & Options stage includes a review of the current approach to distributing growth through the adopted settlement hierarchy (Policy COM2).
- 2.3 The consultation recognises that there are specific challenges for the rural areas, including the affordability of property and the lack of suitable accommodation for young families and the elderly². We support the objective of the consultation to *"consider what role our villages will have and whether they are suitable to accommodate new development over the next 20 years"*³.
- 2.4 This important element of the local plan review should consider the issues facing rural communities, including for example, the 'Taylor Review'⁴.
- 2.5 The Taylor Review identified the concept of a 'sustainability trap' for rural communities. It reported that:
"Planning must not determine the future of development of rural communities against a narrow tick-box approach to sustainable development, assessing communities as they are now and not what they could be. In too many places this approach writes off rural communities in a 'sustainability trap' where development can only occur in places already considered to be in narrow terms 'sustainable' The question planners must address is "how will development add to or diminish the sustainability of this community?" taking a better balance of social, economic, and environmental factors together to form a long term vision for all scales of communities. A mix of housing and employment opportunities are essential for the sustainability of rural communities".
- 2.6 This theme is reflected, at least partially, in national policy and guidance. One of the proposals of the Housing White Paper⁵ last year included *"allowing rural communities to grow"* (Planning for the right homes in the right places).
- 2.7 The National Planning Policy Framework (NPPF) states, for example, that:
"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services".
- 2.8 The same paragraph proceeds to explain that:
"Where there are groups of smaller settlements, development in one village may support services in a village nearby".
- 2.9 Planning Practice Guidance (PPG) also addresses this theme. For example, it states:
"A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities".

² Our future – how do we plan for it? Issues and Options Consultation for the next Local Plan; paragraph 5.12.

³ Our future – how do we plan for it? Issues and Options Consultation for the next Local Plan; paragraph 5.16.

⁴ Living Working Countryside: The Taylor Review of Rural Economy and Affordable Housing, July 2008.

⁵ Fixing our broken housing market, February 2017.

- 2.10 The PPG goes on to state that allocation of sites in the rural area should be considered strategically, and through the Local Plan and/or neighbourhood plan process.
- 2.11 Furthermore, the PPG notes that:
“all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence”.
- 2.12 In response to Q3⁶, a key aspiration for the Local Plan should be to plan positively for the on-going vitality and sustainability of the rural settlements through understanding and appreciation of the challenges facing these areas and how the network of rural villages form sustainable communities.
- 2.13 In terms of the options for the rural settlements discussed in the consultation (Q8⁷), the ‘mixed approach’ is likely to be most suitable. As noted, the PPG states that rural housing is a strategic issue and that site allocations in the rural area are appropriate. National policy and guidance also support community led development.
- 2.14 The revised NPPF also places emphasis on the importance of small and medium sized sites in helping to meet development needs. One of the advantages of smaller sites is that they are often built-out quicker, therefore are important to maintaining housing land supply requirements and help to reduce the reliance on a small number of large site allocations. It also helps to distribute the benefits of development more widely across the local authority area. In accordance with the NPPF, review of the local plan should include consideration of allocating a range of site sizes across the urban and rural areas to ensure a secure supply of housing land.
- 2.15 The option of a “pro rata” distribution may be less appropriate. Noting the concept of the sustainability trap, planning based on the existing number of dwellings/local population could be ineffective. This option would appear to fail to consider the demographics of the settlement and the accessibility to local services and facilities. This could risk some of the smaller communities stagnating, where there may be opportunities for small scale/proportionate growth in recognition of being part of a group of settlements that forms a sustainable community.
- 2.16 A review of the settlement boundaries is also supported (Q9⁸). This should include consideration of amending boundaries in settlements that could sustain more growth over the plan period to encourage development proposals. Rather than defining boundaries by the existing built area, this could be a positive means of planning for the future and identifying further sustainable development potential on the edge of settlements. Such a review should involve the local community, including local stakeholders promoting development opportunities, and be based on a clearly defined methodology.

⁶ Q3 What should the Local Plan aspirations be for the next 20 years?

⁷ Q8 Do you have any comments on the approached suggested above?

⁸ Q9 How should the settlement boundaries be defined in the next Local Plan?

3.0 Development opportunity at Dunkirt Lane, Abbots Ann

- 3.1 The Rowles family is promoting land in its ownership off Dunkirt Lane in Abbots Ann. SHELAA site 190 is approximately 2.1 hectares and is located on the edge of the village, bordering the existing settlement boundary on two sides.
- 3.2 Abbots Ann is identified in the existing settlement hierarchy as a Rural Village. This recognises that the village does benefit from several local services and facilities (including church, public houses, primary school, community shop and daily bus service). It is also in close proximity to a number of other villages with facilities south-west of the principle settlement of Andover. In principle therefore, the settlement can sustain more growth over the plan period, and some growth is likely to be needed to help sustain the existing facilities and services over the next 20 years, for example family housing supporting the local primary school.
- 3.3 Few sites have been identified in the SHELAA at Abbots Ann. There are seven in total, however, Sites 145 and 192 appear to be duplicates and site 106 appears to be remote from the village.
- 3.4 Site 190 is well connected to the village, with access via Dunkirt Lane and public rights of way providing further direct routes to the centre of the village and its cluster of community facilities. The Council's initial commentary on site 190 notes that the local amenities are within walking distance and that there is a bus stop close by on Little Ann Road. This site compares favourably in accessibility terms to other sites identified in the SHELAA.
- 3.5 The assessment states the site has a capacity of 63 dwellings. This appears to be a crude calculation of the site area and application of a typical 30 dwelling per hectares in rural areas. The capacity of the site is likely to be less in this case, when including access arrangements, and landscaping setting. Please see the appended concept plan, which identifies a development of around 30 dwellings.
- 3.6 This is likely to be a suitable scale of development for a village of this size. It is noted that two of the other SHELAA sites are proposing significantly higher levels of growth.
- 3.7 For Site 190, the SHELAA notes that there are no designation constraints and concludes that the site may be achievable and deliverable. It also states, however, that the site is not "suitable" for development, without explaining why.
- 3.8 It is assumed that the Council's reasoning for this conclusion is that the site is currently outside of the settlement boundary and therefore open countryside, where adopted policies generally resist development. A policy change would therefore normally be required for development to be supported (unless, it was through an exception policy, such as community led development). Review of the local plan, including the settlement boundaries and review of the strategy for the rural areas, provides opportunity for the status of the site to be reconsidered.
- 3.9 Development in this area, as well as many other areas of the village, would need to be informed by a careful appraisal of the impact on the Conservation Area and wider landscape, and also take account of the 'design guidelines' of the Village Design Statement (2000), which include preserving the gap between the village and the A303 to the north, and controlling infilling to protect important open views and spaces. Site 190 has the advantage of being located on lower ground and with defensible boundaries.

4.0 Summary and conclusion

- 4.1 Review of the Local Plan provides opportunity to review the strategy for the rural area. Positive planning is needed to ensure that rural settlements do not fall in to the 'sustainability trap'. National policy and guidance support growth in the rural areas to sustain thriving rural communities and help address the particular problems of affordability and lack of choice in housing to cater for changing needs, for example young families and the elderly.
- 4.2 Consideration should be given, as part of the option of a mixed approach, to allocating sites (particularly small and medium sites) in the rural areas, and other positive planning initiatives to support rural areas in a sustainable way.
- 4.3 In summary, Abbots Ann is considered to be an appropriate and sustainable location for a proportionate amount of further housing development. Land off Dunkirt Lane is both available and suitable for new residential development, as recognized in the SHELAA and could make an important contribution to meeting both the Borough's identified housing need and sustaining existing community facilities in the village. Further information to assist the Council in considering this development opportunity can be provided.

Appendix A

Sketch site plan (Drawing 50057 SK1-02).

