

## Planning Policy

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**From:** Thomas Southgate <[tsouthgate@bournemouth.gov.uk](mailto:tsouthgate@bournemouth.gov.uk)>  
**Sent:** 13 September 2018 17:44  
**To:** Planning Policy  
**Subject:** Test Valley Local Plan 2036 - Issues and Options Consultation Submission  
**Attachments:** 180913  
 \_Test\_Valley\_Issues\_and\_Options\_Consultation\_Response\_Gleeson\_Strategic\_Land.pdf

Dear Planning Policy at Test Valley,

Please find attached a consultation response on behalf of Gleeson Strategic Land relating to the Issues and Options consultation on the new Local Plan 2036.

Please can you confirm receipt of this submission.

Many thanks,

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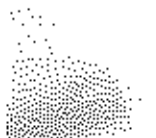
Thomas Southgate MRTPI  
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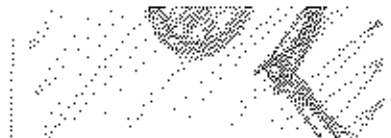
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TEST VALLEY LOCAL PLAN 2036  
ISSUES AND OPTIONS CONSULTATION  
CONSULTATION RESPONSE  
GLEESON STRATEGIC LAND  
SEPTEMBER 2018



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TEST VALLEY LOCAL PLAN 2036  
 ISSUES AND OPTIONS CONSULTATION  
 CONSULTATION RESPONSE  
 GLEESON STRATEGIC LAND  
 SEPTEMBER 2018



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		Signature	
		Date	September 2018
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## Introduction

This representation is submitted on behalf of Gleeson Strategic Land in response to Test Valley Borough Council's (TVBC) Issues and Options consultation for the next local plan which will cover the period to 2036.

Gleeson has an interest in a small site of 5.6 hectares on the south-eastern edge of North Baddesley in Southern Test Valley. The site could accommodate circa 30 new homes in a sustainable location and on a site that is suitable for development, being unconstrained in terms of potential technical obstacles to development.

This representation seeks to respond positively to those questions set out within TVBC's Issues and Options report (July 2018) considered to be most relevant to the promotion of the site for residential development. Specifically, the representation responds to the following matters:

- Housing need
- Housing distribution
- Housing density
- Local gaps
- Transport infrastructure

Gleeson Strategic Land would be keen to work proactively and collaboratively with TVBC with respect to residential proposals for the site to ensure a high quality and appropriate design.

## Vision and Objectives

### **Q3. What should the Local Plan aspirations be for the next 20 years?**

The Government continues to place a high priority on meeting the housing need, in part to increase housing affordability. National Planning Policy Guidance defines housing need as:

*'the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.'*

One of the key aspirations of the Local Plan should be to meet housing need, as a minimum, providing for the full range of need within the Borough covering different tenures and housing types including provision for single people, families, the young and the elderly.

## Living in Test Valley

### **Q4. Should the Local Plan's housing requirement be consistent with Government's standard methodology? Do you have any evidence to support your view?**

It is a requirement of the NPPF (paragraph 35) that the plan is positively prepared, which means that as a minimum the plan must seek to meet the area's objectively assessed housing need. NPPF paragraph 60 is clear that the local housing need assessment must

be conducted using the standard method in national planning guidance unless exceptional circumstances justify an alternative approach.

The draft standard methodology presents an OAN for Test Valley Borough of 569 dwellings per annum (dpa) across the period 2016 – 2026. This compares to the current annual housing requirement of 588 dwellings as set within the adopted Core Strategy Policy COM1 (2011-2029). The latter is based on the 2013 Strategic Housing Market Assessment (SHMA) (January 2014) which identified an OAN range of 450 - 590 dpa in Test Valley.

The final OAN figures are expected this month, but it is important to highlight that the Government is aware that the current methodology is likely, in some circumstances, to result in reduced housing needs. This is contrary to the primary objective of significantly boosting housing supply and commitment to see the development of 300,000 homes a year across the country. Hence, the latest position, published alongside the revised NPPF on 24 July 2018, is that:

*"The government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September 2018.*

*In the 'housing white paper' the government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September 2018. We will consult on the specific details of any change at that time.*

*It should be noted that the intention is to consider adjusting the method to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in 'Planning for the right homes in the right place consultation' and continues to be consistent with ensuring that 300,000 homes are built per year by the mid 2020's."*

It is notable that the NPPF paragraph 11 'presumption in favour of sustainable development' with respect to plan-making requires strategic policies to provide for the OAN as a minimum, with two caveats. These, in summary, are that; the application of policies in the framework which restrict development provide strong reasons to restrict the overall scale of growth; or that the adverse impacts of meeting need would significantly and demonstrably outweigh the benefits.

Test Valley is not unduly constrained by restrictive policies or particular constraints to development. In this context, and in the absence of exceptional circumstances, it is clear that the standard methodology should be the minimum starting point for the housing requirement in the plan.

In considering whether the requirement should provide a further boost to housing supply, above the standard methodology OAN, the following should be considered:

- The SHMA (2014), notes that, "... population growth in the past appears to have been underestimated which will have fed through into the CLG projections." If the

evidence is that this position persists then it would be necessary, in order to plan positively, to increase the housing requirement accordingly

- The 2014 SHMA also outlines that, "from a Test Valley specific point of view there are clearly links across a number of areas and it is difficult to suggest a housing market area from the CLG evidence that fully takes account of cross boundary linkages. We would suggest that it is reasonable for the Council to advance a SHMA for the borough itself but that consideration should be given to key areas outside the local authority."
- Housing demand, under the current core strategy requirement of 588 dpa, currently outstrips supply (see section 5 of the Issues and Options document)
- The inability to afford to buy a house is relatively high in Test Valley

The borough's housing requirement should therefore provide flexibility to address the established links with neighbouring areas.

In any event, under the Duty to Cooperate consideration should be given to assisting neighbouring authorities that are constrained by physical, technical constraints or environmental constraints that do provide those authorities with strong reasons to not meet their OAN. Meeting identified housing need across South Hampshire is a particular issue. The Borough is well placed to assist neighbouring councils of, for example, New Forest and Southampton that may be able to demonstrate that their needs cannot be met within their own administrative boundaries.

In summary, the emerging local plan must be based on a robustly evidenced and objectively assessed housing need, which is consistent with the standard methodology OAN in so far as that OAN represents a 'minimum' for the housing requirement. Beyond that minimum, an uplift should be considered to address the position with past projections and address the Duty to Cooperate. Also, to address any local circumstances, such as the need to support local economic growth or further address affordability issues.

This would be in accordance with a positive and justified approach, as required in order for the plan to be found sound.

***Q5. Should the Local Plan increase its housing requirement to help support economic growth? If yes, do you have evidence to support this?***

As set out above, it would be reasonable to consider an uplift in the housing requirement in order to support local economic growth.

NPPF paragraph 80 is clear that planning should create the conditions whereby businesses can invest, expand and adapt, with significant weight placed on the need to support economic growth and activity. Paragraph 81 then sets out how planning policies should support economic growth, with point c) requiring the potential barriers to investment being addressed, including inadequate housing.

The Issues and Options consultation document outlines that Test Valley has one of the highest economically active populations in Hampshire, with a higher proportion of workers employed in higher category occupations compared with the national average. Further, that many of the residents of the Borough are well educated. The Test Valley Economic Development Strategy 2016-2019 (February 2017), notes that:

*"the combination of its high quality environment and proximity to strong neighbouring centres means Test Valley is relatively 'porous' in commuting terms. The numbers of people who travel into Test Valley to work, who travel out of the Borough to work, and who both live and work in Test Valley are broadly similar (23,000, 24,800, and 23,000, respectively (source: 2011 Census)."*

Test Valley is clearly providing an important resource in terms of living and working opportunities. However, relatively high house prices mean that those working within the Borough may be forced to live outside the Borough and those living in the Borough can only do so through access to higher earning jobs in, for example, the Southampton conurbation, Winchester or London.

The importance of Test Valley within the wider regional economy is reflected in the Solent Strategic Economic Plan (2014-20), prepared by the Solent Local Enterprise Partnership (LEP) and published in March 2014. The Solent Area is described as having 'a population of more than 1.3 million (2011) and more than 50,000 businesses, the Solent Local Enterprise Partnership (LEP) area is an internationally recognised economic hub anchored around the Isle of Wight, the two cities of Portsmouth and Southampton, the M27 corridor and the Solent waterway.'

The vision of the LEP is to create an environment that will bring sustainable growth and foster private sector investment in the Solent. As part of this, a key objective is noted as being the need to 'provide new housing to support our growing workforce.' In addition, the LEP seeks to meet the growth target of delivering 24,000 new homes by 2020.

It can be concluded that additional housing, beyond the minimum OAN, is important and should be positively considered in order to support sustainable economic growth. This approach would reflect the aim contained in paragraph 16 of the NPPF for plans to 'be prepared positively, in a way that is aspirational.'

***Q6. Do you think the HMA boundary is broadly right? If not, how and why do you think it should be changed?***

The NPPG outlines that housing market areas can relate to either local authority boundaries or different area, such as two or more local authority boundaries. Currently, two HMA's cover Test Valley:

- Southern Test Valley (STV) – part of the South Hampshire HMA
- Northern Test Valley (NTV) – the remainder of the borough, which is considered to be self-contained but with links to Winchester, Salisbury and Basingstoke.

The draft standard methodology does not address housing market areas, instead providing a district figure. It is considered that an approach which continues to disaggregate the Borough would be inflexible, unjustified and potentially restrictive of sustainable development. It would also potentially restrict the ability to fully consider opportunities to address the un-met needs of adjacent authorities under the Duty to Cooperate.

If the plan is to persist with the disaggregated approach then a thorough review of the HMA boundaries must be undertaken to provide the necessary up to date evidence and justify the approach.



## Where Should Growth Go?

### ***Q7. Are there any other approaches to distributing development across the Borough that we should consider?***

The Issues and Options consultation document, outlines that the current Local Plan has focussed the majority of new growth around the largest settlements, principally Andover and Romsey, as these have the best range of established serves and facilities. However, it is considered appropriate to review this approach with the following options suggested for consideration:

- Community led distribution
- Proportionate distribution to parishes
- Local Plan allocations
- New village
- Mixed approach

All of these options have some merit but in accordance with the district wide approach to the OAN, relationship with the main centres of employment in the adjacent districts and the NPPF and NPPG advice, the overarching aim of the plan should be to identify the most appropriate locations for sustainable development and to not restrict such opportunities through the imposition of a rigid distributional approach.

A range of spatial approaches should therefore be employed – if anything, the mixed approach. This should encompass a variety of site types and sizes in a range of locations to meet needs across the district. Specifically, this should consider the potential for a number of urban extensions, reflecting the settlement pattern and hierarchy of the Borough. This would include larger scale urban extensions at the main settlements and smaller urban extensions at the key service centres, supporting those centres and providing new affordable housing opportunities at those centres and ensuring a deliverable supply of housing across the plan period.

With respect to opportunities for sustainable development, in the context of NPPF paragraph 11 'plan making', the site controlled by Gleeson provides a sustainable and suitable opportunity for residential development of a scale appropriate to North Baddesley, identified as a Key Service Centre. The site is in a sustainable location, well related to the urban edge (including local infant and junior school) and extremely well contained owing to the dense nature of the woodland and tree belts that contain the site on the western, southern and eastern sides of the site.



The area proposed for residential development is not within an area precluded from the presumption in favour of sustainable development with reference to footnote 6 of the NPPF, there are no technical reasons that would preclude or present an obstacle to the development of the site as proposed and the land proposed for development is not of high environmental value nor is it designated or valued landscape. The general design approach, including access details, can be considered to create a high-quality development.

The social and economic benefits of the site are clear, in delivering circa 30 market and affordable homes. Additionally, there are environmental benefits to be derived from a scheme, comprising lasting landscape and ecological benefits associated with the surrounding woodland which is designated ancient woodland and SINC. Specifically, the scheme would support remediation of the north part of the site together with ecological enhancement and the management of important designated woodland habitat.

The site is within the currently defined North Baddosloy and Chilworth Local Gap but has a mixed planning history. Previously rejected for development initially because of 'lack of need' rather than landscape impact, and more latterly due to the impact on the gap as a consequence of the then proposed access arrangements, there is an opportunity to reconsider these constraints and impacts in the context of ongoing housing need.

**Q8. Do you have any comments on the approaches suggested above?**

The overarching aim of the plan should be to identify the most appropriate and sustainable locations for development. A mixed approach will support the delivery of the plan's aims and objectives, and will provide flexibility to changing circumstances that will occur over the plan's life. Whereas focussing solely on one or two strategies runs the risk of being too narrowly focussed which could result in the identified development needs not being met. This is consistent with the NPPF which identifies the need to increase the number of small and medium size sites (paragraph 68), whilst also advocating the benefits

of strategically scaled sites in the form of urban extensions or new settlements (paragraph 72).

Whichever approach is ultimately adopted, the plan should ensure that the needs of each community are met, as well as meeting the housing need across the Borough.

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

The current approach to settlement boundaries as outlined in the Issues and Options document is based on having *"boundaries along physical boundaries of existing buildings and curtilages rather than more loosely around the edge of the built up area."* In accordance with the need for flexibility to adapt to rapid change, as outlined in paragraph 11 of the NPPF, if boundaries are to be drawn in this way then the policy approach should allow for reasonable development opportunities to come forward on sites outside but adjacent to the boundaries.

**Q12. Should we allow market housing on rural exception sites?**

Yes, this would be in accordance with national policy and incentivise the provision of additional affordable housing in the context of an acute need for affordable homes in the district which will not be met by allocations alone.

## Enjoying Test Valley

**Q.33 Should we continue to retain the principle of Local Gaps? Should we define specific boundaries or a more general policy which aims to avoid coalescence?**

A key principle of the plan making process established in the NPPF is the need for plans to 'be prepared with the objective of contributing to the achievement of sustainable development' (paragraph 16). Furthermore, paragraph 11 highlights the requirement for plans to 'positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.' Whilst there is no guidance on local gaps in the NPPF, the need to be flexible to support sustainable development should be given due weight in the consideration of this policy area.

The allocation of land as local gaps within the emerging plan is not supported. It is considered that the application of local gap policy, with respect to a designated area of land, is unnecessary and a blunt anti-development tool which runs contrary to the provisions of the NPPF with regard to promoting and encouraging sustainable development. Retaining settlement identity is important but this can often only be considered at detailed design stage, when consideration of the issue can be fully informed by master planning details and landscape assessment.

If the principle of local gaps is to be retained then a more general policy would be appropriate and justified. Allocation on the ground, without detailed proposal and assessment information, would not be justified in the context of positively seeking opportunities to achieve sustainable development. A more general policy would guard against land being unnecessarily constrained in circumstances where the intent/objective of gap policy is not breached.

## **Infrastructure in Test Valley**

### ***Q.44 How can the Council promote more sustainable forms of transport such as walking, cycling and public transport?***

It is important to consider this question in context. NPPF paragraph 108 facilitates consideration to be given to the location of development, so that development opportunities are not driven entirely by access to more sustainable forms of transport. This is really important in supporting smaller local communities which do not have access to, for example, frequent bus or rail services.

Notwithstanding the above, there is an opportunity to consider the location of sites relative to access to public transport and the cycle network, as well as proximity to services such as local primary schools. This should be a key consideration in the allocation of sites.