

**Planning Policy**

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**From:** Ryan English <ryan.english@acenglish.co.uk>  
**Sent:** 14 September 2018 15:24  
**To:** Planning Policy  
**Subject:** Test Valley Borough Council Issue and Options Consultation  
**Attachments:** TVBC Issues & Options Consultation 14-9-18.pdf; Location Plan.pdf

Good Afternoon

Please find attached letter which provides a response to Test Valley Borough Council Issue and Options Consultation for the next Local Plan.

Kind regards

Ryan English  
A C English Developments Ltd  
Tel: 01753 832222



# English Developments Ltd

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

14 September 2018

Dear Sirs

## Test Valley BC Issues and Options Consultation

This letter provides the response of A C English Developments to the Test Valley Borough Council 'Issue and Options Consultation for the next Local Plan', July 2018.

We would support a new spatial approach that recognises that housing-led growth, while still partly focussed on the two main settlements should also deliver a sustainable future for other locations like the Valley Park/Chandlers Ford fringes which were identified as sustainable and relatively unconstrained locations for future growth in the evidence base prepared for the adopted Local Plan 2011-2029 (ref: Land South of Flexford Road SHLAA 2013 Site 120 and Test Valley Sustainability Appraisal, 2012 'Valley Park' = rank 2 (of 4) and a Key Service Settlement where strategic allocations can be permitted) and has access to the facilities identified as necessary for a sustainable centre.

We also consider that this area can address duty to cooperate objectives at the interface with Eastleigh Borough Council and the sphere of influence of the Southampton Housing Market area.

The Issues & Options document confirms that there is a higher reliance on private cars with 10% more households in Test Valley owning a car than the national average. We believe that land at Valley Park integrating into existing public routes and nearby services can promote walking, cycling and public transport as a counter to that trend.

The NPPF 2018 paragraph 72 supports expanding settlements with significant extensions judged to have suitable infrastructure and facilities. Valley Park is such an area that is "well located well designed, and supported by the necessary infrastructure and facilities."

**Question 4** - OAN should be used to determine the 'minimum' number of homes needed. The Government's standard methodology is the starting point but allowing for housing provision above this level to take into account local factors like affordability, responding to the current context in Test Valley, where housing demand currently outstrips supply, (as noted in section 5 of the Issues and Options document) and the duty to cooperate with neighbouring local authorities suggests that the standard minimum should be increased. TVBC should also prepare the Local Plan following the publication of the revised household projections, and finalised national methodology, prior to progressing with identifying the OAN.

**Question 5** – It is recognised that increased housing supports economic growth and the local economy. We would hope that the Local Plan Review grasps the opportunity not only to meet OAN but also do more to



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deliver and underscore jobs. The Issues and Options consultation document indicates 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. Additional housing above OAN has a role to play in supporting the economy.

**Question 6** – The current Local Plan and appeals have recognised the split between NTV and STV but the draft national standard methodology OAN applies a district-wide approach. As part of the emerging Local Plan, and assessment of need, it will be important for TVBC to determine whether it remains appropriate to disaggregate between STV and NTV. The Issues and Options documents explaining that 42% of residents (24,993 people) in Test Valley work outside the Borough (particularly out-commuting to Southampton, Winchester, Eastleigh, Wiltshire and Basingstoke and Deane and there is parallel 40% (22,985 people) in-commuting to work from outside Test Valley (i.e. Wiltshire, Southampton, the New Forest, Eastleigh and Winchester). Andover meanwhile remains a relatively self-contained employment area. We would support clarification through the LP Review that southern test valleys needs are identified and met through housing allocations that are proportionate to its important economic role within the Partnership for Urban South Hampshire area.

**Question 8** - a mixed approach to the spatial distribution of development will be necessary in order to achieve sustainable development and deliver the development required including settlement extensions such as that we envisage at Valley Park.

**Question 9** – although settlement boundaries are currently drawn along physical boundaries this often inhibits future growth and does not provide flexibility, other than planning by appeal, for adjustments to housing delivery between local plans. The NPPF 2018 paragraph 11 seeks flexibility. One way that this could be achieved would be to have a 'search area' approach that not only identifies specific deliverable sites, through planning policy allocations with associated settlement boundary adjustments, but also 'delivery contingency areas' where additional homes could be built, between plans, triggered by the Council's trajectory monitoring. The starting point however is treating the final OAN as a minimum level of need.

**Question 18** – setting density standards is a crude planning tool that could arbitrarily constrain housing supply. The NPPF 2018 gives Planning Authorities greater control over design and paragraph 122 indicates that the aim should be to make efficient use of land, considering local market conditions and viability, available infrastructure, and the character and setting of the area. Rather than density we would support site-specific masterplanning as the correct planning tool for meeting the objective of efficient land use tailored to local circumstances.

**Question 33** – local gap policy restricts development contrary to the provisions of the NPPF and fails to encourage sustainable development. We believe the spatial strategy of the emerging plan should consider all potential development sites in terms of their sustainability and potential to accommodate future growth without this policy applied. Further the Council has adequate controls to avoid settlement coalescence through countryside and ecological policies and landscape-led masterplanning of new development.

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## Conclusion

A C English Developments has a stakeholder interest in land at Land South of Flexford Road, Valley Park (see attached site plan) and can deliver substantial numbers (c.350) of new homes, in conjunction with a national housebuilder, and will be submitting promotional material and surveys to future stages of the Local Plan Review. We hope for a constructive dialogue with the Council to take this matter further in the near future.

Yours faithfully

Ryan English,  
A C English Developments Ltd



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A.C. ENGLISH DEVELOPMENTS LIMITED

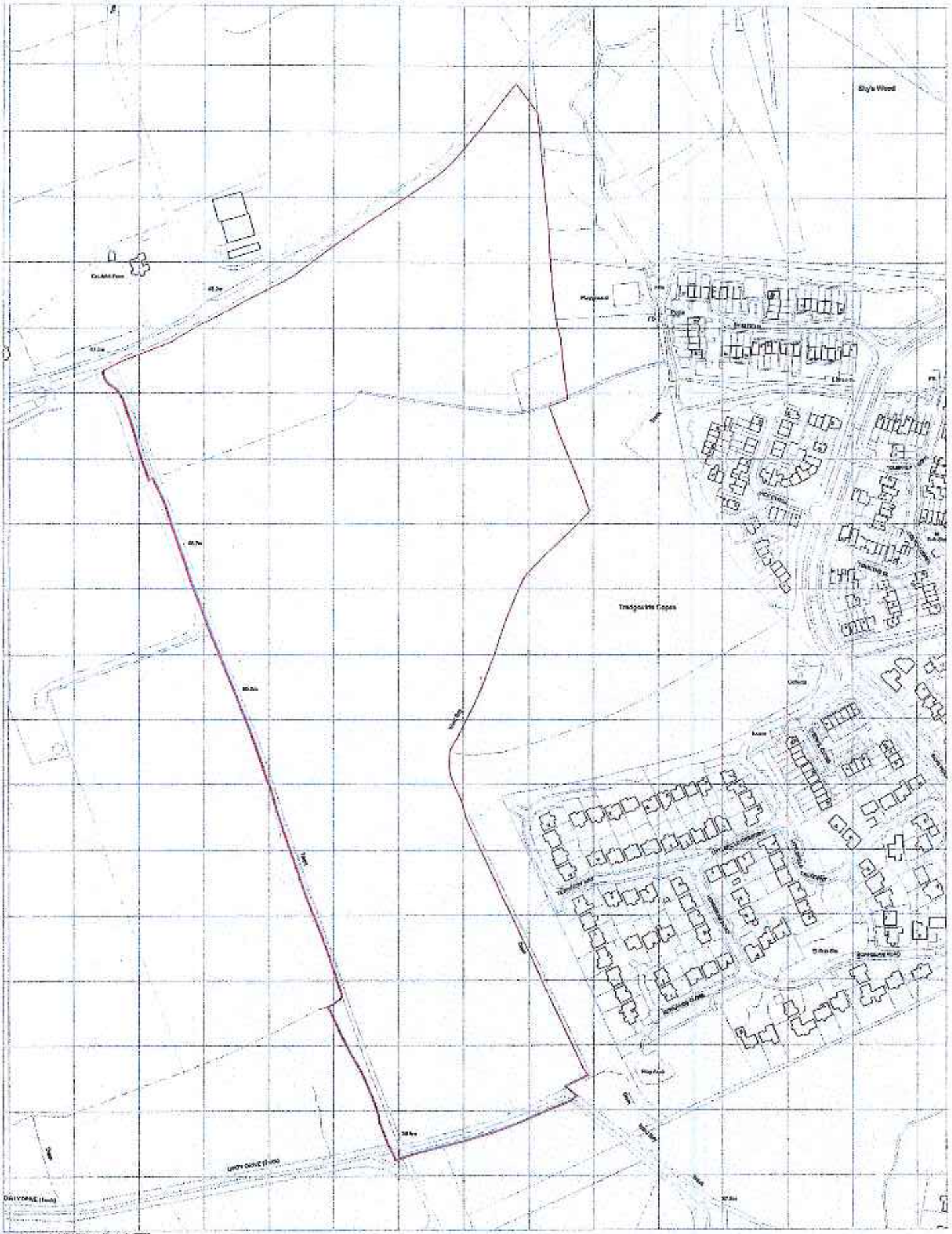
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DRIVER'S (1000)

KEY

- SITE BOUNDARY
- STREETS AND DRIVEWAYS

SCALE 1:1250 (A1)

