

Planning Policy

From: Michael Knappett <
Sent: 14 September 2018 16:10
To: Planning Policy
Subject: Issues and Options Consultation for the next Local Plan
Attachments: 13.09.18 Submission on behalf of David Houston.pdf

Dear Sir/Madam

Please find attached comments on behalf of Mr David Houston on the Issues and Options Consultation for the next Local Plan.

Regards

Michael Knappett

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**RESPONSES TO THE TEST VALLEY
ISSUES AND OPTIONS CONSULTATION
FOR THE NEXT
LOCAL PLAN**

**RESPONSES MADE ON BEHALF OF
MR DAVID HOUSTON**

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Bryan Jezeph Consultancy Ltd

September 2018

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Q1: What is good about living and/or working in Test Valley?

It is a relatively affluent area with reasonable housing and employment provision. The population has a relatively good educational level which has improved between the last census and the one before.

Q2: What could be improved about living and/or working in Test Valley?

The deficiencies which have been identified e.g. the affordability of housing, the ageing population, the poor public transport and reliance on private transport all need to be addressed.

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

To make progress on the above issues and to avoid any retrograde steps.

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

It seems that the Council will need to take an approach consistent with the Governments standard methodology or there is a risk that the Plan would be rejected as not being in accordance with National Planning Policy.

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

Given that your paper advises that 42% of residents work outside the Borough for employment, I would have thought that the emphasis should be on creating more jobs within Test Valley.

However, no society should be complacent and therefore some additional housing is likely to be an added stimulus to the economy.

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There is anecdotal evidence that some local authorities struggle to attract high-skill firms due to a lack of appropriate executive-level housing in their areas for their workers to buy.

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

The Housing Market Area Boundaries in Test Valley appear to be very skewed towards Andover. No explanation is given for this. On the face of it those parishes to the north of Romsey relate more to Romsey than to Andover. Anyone looking to move to the Romsey area would inevitably also consider Braishfield, Michelmersh, Awbridge, Sherfield English and those parishes to the southwest of the district.

The HMA boundaries should be redressed to provide a better balance between Andover and Romsey and to better reflect the choices that people are likely to make.

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

The long-term failure to provide more housing in the rural villages has created enclaves of great wealth, expensive housing and an ageing population. The less wealthy have to rely on affordable housing through any rural exception schemes that may come forward, such as the 9 affordable homes built by Hyde Housing on land off Braishfield Road, Braishfield. The services including shops, schools and community facilities suffer gradual decline due to the increasing elderly population.

Every settlement and village needs to be assessed to examine its potential to accommodate more development. Braishfield, for example, benefits from its proximity to Romsey and the wider services, facilities and jobs on offer there. Nevertheless, small housing allocations around the edges of Braishfield would enable the village to at least sustain the services and facilities which it still has and for new families with children to move into the village.

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

Community led distribution is aspirational. Very few communities actually want to encourage new housing, although there has been some success in the Borough. Paragraph 69 of the NPPF would support the allocation of small and medium-sized sites by neighbourhood planning groups.

Proportionate distribution to Parishes sounds equitable but in reality, some parishes would be better placed to see growth than others. However, this method would ensure that the parishes were given a guaranteed housing figure with new housing then provided through either of the options outlined. It may be preferable for sites in parishes to be allocated via the Local Plan process, as this way housing may come forward quicker than via the neighbourhood planning or community-led development routes.

Local Plan Allocation has the benefit of the application of professional planners' judgements on where housing might best be accommodated. However, the fear with this option is that the Council will seek to retain the *status-quo*, in that the majority of new housing will come from strategic sites, again, close to the two main centres of Andover and Romsey.

New Village option may not be the best for Test Valley. The borough is dispersed and there appears to be no immediate pressure for a new village. It would take many years to establish and would suffer the problems of the existing villages in terms of transport links. Far better to use the existing resources in existing villages and build upon them.

Mixed Approach option worked in Winchester District, where the Council's Local Plan Part 2 allocated sites for housing in the larger settlements except Denmead. The Denmead Neighbourhood Plan allocated sites in Denmead and it was 'made' before the adoption of Local Plan Part 2. The concern with too many neighbourhood plans seeking to allocate sites is that some of them will fall behind and the Local Plan will need to step in and take over the process.

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

The existing criteria for defining settlement boundaries is logical. However, it needs to be implemented in a sensitive and pragmatic way. All existing boundaries should

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be reviewed with a view to making minor modifications if appropriate. For example: where a planning permission or planning appeal has been allowed that changes the situation on the ground, or where a boundary tightly follows a curtilage resulting in the exclusion of a small area of land which is effectively surrounded on three sides by defined urban area.

Q10: Do you think we should continue with seeking up to 40% of new homes to be affordable, or should we change the percentage?

There is a case for changing the percentage (see below).

Q11: What should the trigger be for seeking affordable housing?

It is currently the case that at whatever level affordable housing is triggered there is a tendency for development to be proposed just under that threshold. It would perhaps reduce this tendency if the affordable housing percentages increased gradually according to the number of dwellings or site area, as per the revised wording of Policy COM7.

However, the wording of the current policy must be updated to reflect the 2018 NPPF's definition of major development in Annex 2.

Q12: Should we allow market housing on rural affordable exception sites?

If an edge of settlement site is suitable for affordable housing then it must also be suitable for market housing. Furthermore, estates of market housing must be pepper potted with affordable housing to get a good social balance. Surely it works the other way too.

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

Why is this question a matter of choice? I see no reason why both provisions should not apply. The White Paper: Fixing the Broken Housing Market seeks to diversify

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the market. Self-build and custom build housing are encouraged and this form of housing should form part of the assessment of settlement boundaries.

Q14: Should we establish a policy that covers dwellings in the countryside which are of exceptional quality?

Paragraph 55 of the old NPPF and paragraph 79 of the 2018 NPPF make provision for this form of housing. The introduction of a policy to cover this may appear as an endorsement of a device to achieve housing in the countryside, which in reality should be only very rarely used.

Q15: 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?

Early in this Issues and Options paper the fact that the population in Test Valley is ageing more quickly than the Hampshire average was highlighted. The problems of an ageing population need to be addressed. Nationally it is estimated that by 2035 there will be over 100,000 people over 100 years of age. The Council should invest in suite of policies addressing the issues of the older people including specific allocations, or percentages of an allocation. The policies could also include providing more bungalows and a more rigorous approach to providing homes for life.

Q16: 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?

It is not realistic to rely on the market which is dominated by large national house builders. The White Paper: Fixing the Broken Housing Market seeks to diversify the market. This can only be achieved by appropriate planning policies.

Beyond the policy requirements for affordable housing, aged persons housing and wheel chair users the market should not be unduly restricted. A policy seeking a broad mix of housing types and sizes would bring some control without being too regulatory.

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Q17: Should we restrict the size of replacements and extensions to dwellings in the countryside to keep a range of dwellings?

The policies for replacement dwellings and extensions should be based upon appropriate criteria. Restrictions on sizes should only apply where there is an unacceptable impact upon the landscape or townscape.

While it is desirable to ensure that there is a pool of small dwellings this would best be achieved by the provision of more housing with an appropriate mix of sizes.

Q18: Should the Council establish density standards in the Local Plan?

The existing approach as set out in paragraph 5.44 should be continued.

Q19: Do you think we should establish internal space standards for future homes?

The nationally described space standards should be adopted and are relied upon by other local planning authorities.

Q20: Do you think we should establish standards for accessible, adaptable and wheelchair user dwellings?

A reasonable proportion of new dwellings should be included in larger schemes for wheel chair users.

Q21: Should the Local Plan set out a definition of rural worker? And if so what should it include?

Yes. The existing definition.

Q22: How do you think we should best meet Gypsy, Traveller and Travelling Showpeople's needs?

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No answer.

Q23: Do you agree that we should have a specific policy on health and wellbeing? What sort of issues do you think it should cover?

No. It is difficult to define a policy on health and wellbeing that is meaningful and deliverable in planning.

Q24: Should some types of facilities and services be given more protection than others?

No. This is not practicable. The market will dictate what is viable.

Q25: Should we continue to protect all existing community facilities and services?

No. See above.

Q26: Should we allocate more land to enable more choice and flexibility to the market?

You should allocate more land for employment, not for 'more choice and flexibility' per se but because you want Test Valley to be an economic success and because there is currently an outmigration of the population to employment in other districts.

Q27: What are your views on promoting smaller workspaces within the Borough?

The offer of smaller work places is a good idea for startup businesses.

Q28: What provisions or controls should be made relating to people working from home?

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Given that Test Valley has a large number of villages which are not particularly well served by public transport the concept of working from home must be considered advantageous in the context of sustainability. The provision of high quality broadband is essential to enable people to work from home.

However, home working needs some form of control to ensure that the use does not give rise to unacceptable levels of deliveries, parking, noise etc.

Q29: Should the Council continue to encourage retail uses within primary frontages or should a more flexible approach be taken with a greater range of uses being allowed?

The high street is changing rapidly due to internet shopping and the planning system needs a more flexible approach. Whilst some flexibility within primary frontage may be acceptable it is important to keep the primary frontage vibrant and relevant to retailing. It is the secondary frontages and more peripheral areas that need to be addressed. These areas need to be moved out of retailing and perhaps to residential so that retailing is focused on the primary frontage.

Q30: How should we best continue seeking apprenticeships?

No answer

Q31: What should be included in any tourism policy in the next local plan?

No answer

Q32 Should there be measures to support tourism proposals, and if so, what?

No answer

Q33: 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?

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Local gap policies have been successfully challenged at Planning Inquiries. This is confusing for local residents who see it as an absolute restriction on development. It is desirable therefore to develop a more criteria based policy to address the issues of coalescence.

Q34: Should the Local Plan identify and designate Local Areas of Green Space or should this be undertaken via Neighbourhood Plans?

These designations should be left to Neighbourhood Plans. However, the skill set of Neighbourhood Planning Teams is limited and it is essential that advice is provided by the Borough Council.

Q35: Should the next Local Plan continue to promote water efficiency from new developments?

Yes

Q36: Should we identify suitable sites for renewable energy, including onshore wind, in the Local Plan?

If appropriate sites can be identified then these should be included in the new Plan. It would be preferable if householders were encouraged to ensure that their homes were well insulated and provided their own photovoltaic panels and communities considered ground source provision as well as wind turbines.

Q37: If so, which areas of the Borough would be appropriate and for which types of technology (e.g. wind turbines, solar photovoltaic panels)?

Areas of less landscape value.

Q38: Should the Local Plan encourage energy efficiency when constructing new development?

Yes. This is essential.

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Q39: How can we improve design quality within the Borough?

This requires robust and clear policies supported by appropriate documentation. This could be the provision of a design guide, development briefs for specific areas and the engagement with neighbourhood planning. Eastleigh Borough Council, Fareham Borough Council and Winchester City Council are just three LPAs with their own design guides.

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

It is essential to examine existing provision when considering future requirements. Fareham Borough Council's Planning Obligations SPD includes advice on the thresholds for different types of public open space required depending upon the scale of the development. The Council could look to adopt something similar, after having first examined the existing provision.

Q41: 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?

No answer.

Q42: Should alternative open space for mitigation be provided as part of new developments or should land be specifically allocated, or a combination?

A more flexible approach needs to be given to the provision of open space for mitigation so perhaps a combination of the two approaches may be best.

Q43: Is there anything additional which the Council should be taking account of?

No.

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Q44: How can the Council promote more sustainable forms of transport such as walking, cycling and public transport?

Increase the amount of housing in the villages most able to accommodate development particularly those close to main roads with the objective of improving the public transport links between the villages and the main towns. Braishfield is one such village where public transport to centres such as Romsey could be improved, especially the frequency and timings of the bus services.

Q45: How do you think the Council should be making provision for parking within new development?

Test Valley has been identified as being particularly dependent upon the car. Parking should be provided to meet needs and provide for some over flow/visitor parking. Parking needs to be proximate to each residence, visible if possible from the household but not prominent in the street scene. Parking courts are not generally favoured by residents. On plot parking seems to work well.

The Council could consider the use of car ports instead of single garages. This avoids garages becoming general storage areas in preference to a place to park the car.

Q46: Do you agree with the Council's current approach or are there changes you would like to see made?

No answer.