

Planning Policy

From: Maphosa, Joe < >
Sent: 14 September 2018 16:15
To: Planning Policy
Subject: Issues and Options Consultation for the next Local Plan , July 2018
Attachments: 2018.09.14 PHSC Test Valley Issues and Options Consultation Response.pdf; Appendix 1 Packridge Farm , North Baddesley.pdf; Appendix 2 Land East of the Middleway, Picket 20, Andover.pdf

Dear Sir/Madam,

Please find attached documents which constitute Persimmon Homes' response to the Issues and Options Consultation 2018.

Should you require any further information please do not hesitate to get in touch on the details below.

Kind Regards,

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TEST VALLEY BOROUGH LOCAL PLAN

ISSUES AND OPTIONS CONSULTATION

JULY 2018

RESPONSE FROM PERSIMMON HOMES

INTRODUCTION

Persimmon Homes welcome the opportunity to comment on the Issues and Options consultation for Test Valley Borough Local Plan. Our response is based on the questions set out in the consultation document.

In addition to our response to the Issues and Options questions we have attached information at Appendices 1 and 2 which provides details on a potential development sites to help meet the future housing needs of the borough.

RESPONSE TO CONSULTATION QUESTIONS

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

No comment.

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

No comment.

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

The Local Plan should as a minimum aim to meet the needs of the borough and the unmet needs of the Housing Market Area. Additionally the plan should explore mechanisms of delivering additional community facilities/benefits through the provision over and above the housing needs of the borough as reference in paragraph.

Q4: Should the Local Plan's housing requirement be consistent with Governments standard methodology?

Yes. Complying with the Government's standardised methodology will ensure that the new local plan is consistent with national policy. Further to this, as required by paragraph 11 of the NPPF 2018, local authorities are also required to identify land which can help meet the unmet needs of neighbouring authorities. The Southern Test Valley HMA is part of the Southampton HMA and as such, as part of the local plan review, the Council should consider whether it is able to identify land over and above the baseline requirement set out in the standardised methodology, in order to help address the unmet needs of the Southampton HMA. Particular consideration should be given to helping the neighbouring city of Southampton which is heavily constrained and the New Forest

The consultation document touches briefly upon this at paragraph 5.6 but falls short of fully informing the residents of the borough on this fundamental national policy requirement and consequences to the local plan scope and preparation. It is our opinion that Test valley should help meet a proportion of the unmet need of the Southampton HMA due to the heavily constrained HMA, with less constrained land in TVBC. We invite the council to therefore, at the earliest opportunity, inform the public of the requirement to find additional land to help address the unmet needs of the Southampton HMA.

Do you have any evidence to support your view?

An analysis of the Partnership for Urban South Hampshire (PUSH) Spatial Position Statement (2016) at Table 1 (OAN) (page 14) and PUSH Position Statement H1: Housing Distribution (page 33-34) reveals a high level of unmet need within the Southampton HMA which as of 2016 stood at 10,900 dwellings up to 2036. The application of the standardised methodology will further exacerbate this situation.

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

Local plans are required to help meet the economic aspirations of Local Enterprise Partnerships and as such should aim to provide the requisite amount of housing to help support the delivery of LEP economic aspirations. The required level of housing should be set out in the Council's sensitivity testing of the local plan housing target.

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

The current HMA is based on travel to work areas derived from the 2011 Census data and as such is considered robust. The council has not presented any evidence nor indicated emergence of such evidence suggesting a significant change to commuting patterns which would warrant a review of the HMA boundaries. Persimmon Homes therefore does not see the justification for altering the current HMA boundaries, which have been through public examination previously and found sound.

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

Yes. The council should use the SHELAA to identify where there is suitable, available developable land as a starting point then explore ways of delivering the infrastructure to not only support the new development but those of existing communities as well. This will ensure that the development constraints of the borough are reflected within the new local plan and its distribution of development.

Given the high level of unmet need, the council should be looking to deliver a higher proportion of dwellings to help address unmet needs of the Southampton HMA. The focus of

this additional provision should be southern Test Valley which is located within the Southampton HMA.

Persimmon Homes are actively promoting a development site at North Baddesley which in our view offers an ideal opportunity to help meet the needs of the borough as well as the unmet needs of the Southampton HMA. For ease of reference, our submission to the Call for Sites 2017 is enclosed at Appendix 1.

Further to the North Baddesley site, the company are also promoting Land east of Midlway, Andover. The site is an additional parcel of land which forms a logical extension to the Picket Twenty Extension site which Persimmon Homes is currently building out. Further information on the site is set out at Appendix 2 of our submission.

In addition to the above, given the affordability issues in the northern Test Valley HMA the council should be looking to make these areas the focus of additional development.

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

Community led distribution

This approach is broadly in line with national policy and guidance, however, to ensure that the delivery of much needed housing is not delayed unnecessarily, the council should ensure that sufficient resources are put in place to help meet the demand for the technical assistance required by parishes and neighbourhood planning groups.

It may be more pertinent to undertake community planning workshops post determination of the requisite housing distribution figures. These workshops should be centred on the sites identified as part of the SHELAA or where there is an absence of the sites the Council should work with local parishes to proactively bring forward sites which will help meet the development needs of parishes.

Proportionate distribution to parishes

This approach may be problematical in that the proportion of population may be at odds with development constraints. For example Settlement A with a lower capacity to accommodate additional development may have a higher proportion of the current population in comparison to Settlement B, which while having a significantly lower proportion of the current population has a significantly higher capacity to accommodate additional development.

Local plan allocations

The local plan allocation process provides a mechanism for the thorough assessment of potential allocation sites and has the added advantage of frontloading a significant proportion of the planning process.

New village

No Comment

Mixed approach

We agree that a mixed approach represents the most justified approach ensuring that there is certainty in the delivery of homes with larger strategic sites phased to the latter stages of the plan period and smaller sites which can be delivered more readily phased in the short to medium-term.

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

Given the significant level of housing required to address the unmet needs of the Southampton HMA the council needs to seriously consider the quality of areas currently designated as countryside in line with the PUSH settlement Gap policies, retaining only land which is essential to preventing the coalescence of settlement. In order to do this in a manner which is evidence based, the council should undertake a qualitative assessment of the current settlement boundaries based on landscape features and the capacity for development to be accommodated without causing significant harm. Preference should be had to utilising those areas which are identified as scoring poorly in terms of their contribution to the landscape value of certain areas or boundaries to the settlements.

Additionally the council should explore opportunities to strengthen the significance of some landscapes and boundaries through the allocation of sites with accompanying strategic landscaping.

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

The level of affordable housing should be based on need and viability evidence.

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

The level of affordable housing should be based on need and viability evidence.

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

Persimmon Homes are of the view that affordable housing targets should be set out within the plan. This is on the proviso that the local plan is proactive enough to allocate sufficient sites to meet the identified needs of both market and affordable housing.

Notwithstanding the above, there are clear affordability issues in the Northern Test Valley HMA which may be addressed through the delivery of market housing albeit with a higher proportion of affordable housing on rural exception sites. Paragraph 77 of the NPPF 2018 reflects this view, which will stimulate the market for and encourage developers and RSL alike to seek more opportunities to deliver rural exception sites in order to help meet the needs of the rural communities.

Q13: How should we meet the requirement for Self Build plots?

Based on the council's assessment of demand for self build plots as well as the provenance of the demand, Persimmon Homes are of the opinion that the needs for such plots are adequately addressed through paragraph 79e of the NPPF 2018.

In support of the above, policies within the new local plan should be positive with regards to replacement dwellings, village infill sites and exception sites.

Furthermore, should the council still be minded to pursue a policy relating to self-build, we would advise that the wording of any such policy reflect Footnote 26 and equally the NPPF Glossary definition, which for ease of reference is reproduced below;

Self-build and custom-build housing: Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.

The wording of the NPPF allows flexibility for the incorporation of **either** self-build **or** custom-build as part of development, a proposition that may be more readily accommodated subject to site specific considerations. Additionally, any local plan policy would be required to reflect Footnote 26 and the NPPF glossary definition in order to meet the test of *soundness*, as set out at paragraph 35d, of the NPPF.

Should it be as part of sites over a certain threshold or separate sites?

No. Persimmon Homes are of the view that self build plots should not be required on sites of 100+ units. This Council's evidence indicates that the demand for self build plots is for 1 off plots in the countryside as opposed to housing estates. As such, there is no evidence of need warranting a policy requirement for the incorporation of self and custom build plots particularly on Allocation sites of 100+ units.

Government guidance sets out a requirement to meet any identified need within a 3-year period from the corresponding base date. In order to provide a '*positively prepared*' policy the Council should explore an exceptions policy for bespoke one off self and custom build properties or small scale allocations for serviced plots of circa 10 units which would enable the delivery of demand where it emanates without placing a policy hurdle for large scale development.

Furthermore the practical implication of the delivery of self and custom build plots on large sites is discussed in greater detail below.

Practical considerations

Persimmon Homes are of the view that it is not appropriate to provide self build plots on new build development sites of 100 or more units because this has impacts on:

- Design and layout requirements of the Design and Access Statement.
- Phasing and completion of the wider site.
- Section 106 contributions due to the exemption that applies to self-build housing.
- Delivery of housing where supply on an ad hoc basis by self builders is likely to be slow compared with the remainder of the site or even not take place at all.

This results in practical and management problems as follows:

- the reserve matters period running out and needing to be extended.

- Ad-hoc builders turning up outside specified hours of work.
- Storage of materials as there is limited room on plot and storage spills onto the market housing part of the site.
- Purchasers having to stop building due to unemployment/lack of funds.
- Purchaser dissatisfaction where building continues on a site which was expected to finish when they moved in.

In view of the above, there should be no requirement for self and custom build plots as part of large scale housing sites.

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

Yes. This approach will ensure that, as far as is practicable, supply meets demand, which as per the council's evidence is led by location.

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?

No. The provision of housing for elderly persons is already reflected within the market which will adjust in order to meet any additional demand.

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?

Persimmon Homes are of the view that the market is best placed to meeting the needs for different types of houses with people generally choosing the types and size of property which better meets their needs.

On the other hand, there may be merit to the council prescribing the size and type of affordable dwellings which by their very definition are occupied by people whose needs cannot be met on the open market.

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

No comment.

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

No. Persimmon Homes are of the view that density of development should be assessed on a case by case basis to better reflect the prevailing character of the context.

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

The application of space standards should be based on the evidence of need and also assessed for the consequential impact on affordability as larger properties will attract a higher premium.

There is no evidence of the need for space standards neither is there a market led demand for them. Furthermore given the significant affordability issues within the borough, the imposition of space standards will lead to people at the entry level of the market being priced out of the market altogether.

In view of the above Persimmon Homes is of the view that there is no justification for the establishing of space standards.

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

Persimmon Homes are of the view that the market is best placed to meet demand for higher accessibility standards as and when they arise. This is however with the exception of affordable dwellings which by their very definition are occupied by people whose needs cannot be met on the open market.

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

No comment.

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

No comment.

**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 comment.

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

No comment.

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

No comment.

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

No comment.

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

No comment.

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

No comment.

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?

No comment.

Q30: How should we best continue seeking apprenticeships?

No comment.

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

No comment.

Q:32 Should there be measures to support tourism proposals, and if so, what?

No comment.

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?

Please see our response to question 9.

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

The local plan already identifies area of public open space which should reflect the green space needs of local communities. If further areas of openspace a required this should be based on evidence of need and be based on functional openspace.

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

Persimmon Homes are of the view that this is a matter for Building Regulations, which is a national standard. There needs to be clear evidence that higher standards are justified do not affect viability.

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

No comment.

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

No comment.

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

Energy efficiency has significant cost saving for developers and as such is reflected within current practice. Persimmon Homes are therefore of the view that there is no requirement to set specific policy hurdles for development.

Furthermore, as indicated by the government, this will be a consideration for Building Regulations as opposed to planning.

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

Design quality is built into the planning process and reflected in the NPPF 2018. The council also makes reference to Village Design Statements as well as an SPD which notes the character appraisals of areas within the borough which will be used to assess the quality of proposed new development.

In view of the above Persimmon Homes are of the view that there are sufficient measures in place to ensure that design quality is improved.

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?

This is helpful for developers, but should be evidence based, reflecting lower/higher demand in certain areas.

Q41: Should we continue to set a per dwelling or per hectare standard for recreational open space provision on residential developments?

See our response to Question 40.

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?

The needs set out in the Playing Pitch Strategy appear to formal play pitch provision and as such does not cater for incidental open space, play areas etc. While there is a need to plan

for formal playing pitches the delivery of such community facilities needs to be co-ordinated through the Infrastructure delivery Plan which appropriate contributions sought from new development towards the delivery of such facilities.

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

The council should ensure a degree of flexibility so as to allow for the application of mitigation having regard to the site specifics of development proposals. As such, Persimmon Homes advocates for a combination of the two options.

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

No Comment.

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

No comment

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

In our experience, the provision of on plot frontage parking provides the most convenient, secure and consequentially well used parking provision.

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

The council's current approach provides sufficient flexibility and as such is considered to be adequate.

APPENDIX 1: PACKRIDGE FARM, NORTH BADDESLEY

**APPENDIX 2: LAND EAST OF THE MIDDLEWAY, PICKET 20,
ANDOVER**

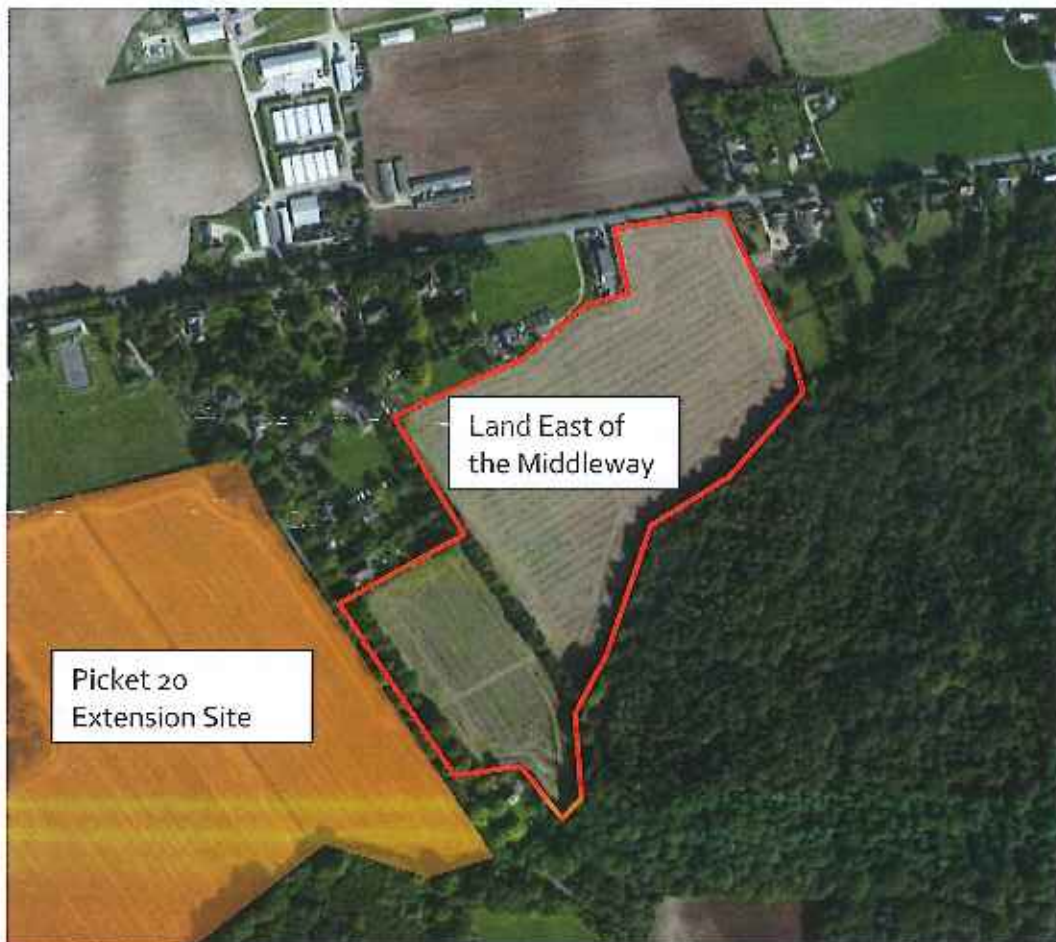
**Test Valley Borough Council Issues & Options Consultation
Site Submission for Consideration**

10131

Land East of the Middleway, Picket 20, Andover

Introduction

As part of Persimmon Homes' response to the current Test Valley Borough Council Issues & Options consultation, the Company would like to put forward land in our ownership for consideration. The site is located East of the Middleway, which is also to the East of the Picket 20 development in Andover. See site plan below:



For ease of reference, the sites location in relation to the wider town of Andover can be seen at Annex 1, which is an overlay of the adopted Policy Map for Andover with the land shown edged red.

Background

The site is owned by Persimmon Homes. The Company will soon be completing the initial phase of the Picket 20 site, which was originally approved for 1,200 units in 2006 (application reference TVN.09275). That outline approval established a significant extension to the town of Andover, to the East of the A3093 and South of London Road. The approval provided new roundabouts on the A3093 and London Road, as well as providing for community facilities, a Primary School, a Local Centre, an Urban Park, Harewood Common (serves as a buffer between development and Harewood Forest) and other areas of Public Open Space.

Following the establishment of Picket 20 as a neighbourhood, the Council chose to expand the area Eastwards, with the allocation of the Picket 20 Extension in the 2011-2019 Local Plan (Policy COM6A). Following the allocation, Persimmon Homes secured a detailed approval for 520 new dwellings in January 2018 (application reference 16/03120/FULLN), to be delivered alongside a further extension to Harewood Common, land for allotments and further areas of Public Open Space. Work has already started on site, but when completed this extension to Picket 20 will effectively take the boundary of development to the Middleway.

It is clear that Test Valley Borough Council will need to find additional sites to meet new housing numbers in the emerging Local Plan. The revised plan period means that there will be a new requirement to cover years beyond 2029, and the new standardised methodology along with pressure from neighbouring Authorities, means annual requirements are also expected to rise. Taken in this context, a further expansion to the established neighbourhood at Picket 20 is considered a logical option for the Council to consider.

Site Context

The site is located East of the Middleway, and south of London Road, with long frontages onto both highways. There are residential areas, fronting both the Middleway and London Road, to the north and east of the site. There are areas of commercial land on both sides of London Road as well. To the south is a significant area of woodland, which forms part of Harewood Forest.

The fields are currently open in nature, with a single tree line field boundary running north to south, and are in agricultural use. Once the Picket 20 extension is completed, the fields will represent the only undeveloped areas between London Road and Harewood Forest.

The surrounding residential development and woodland means that the fields are currently well screened from most views, and there is no public access across the site. Existing

vegetation boundaries from the Middleway screen views from the East and as such if development was approved on the site it would have minimal landscape impact. There are current intermittent views from London Road, but additional landscaping along this frontage would easily provide sufficient screening.

Proposed Development

The site is circa 23 acres in size, and the Company believes that circa 13 acres of this is suitable for residential development. This would deliver circa 250 new homes, plus a further extension to Harewood Common to mirror what has been approved on the Picket 20 Extension site. An indicative land use plan has been included at Annex 2 to show how this could be achieved.

Site access can be provided from London Road and/or the Middleway. There is also an opportunity to link vehicular traffic from the existing Picket 20 scheme, subject to agreement with the Council. The Picket 20 Extension site currently includes an area of public open space between planned housing and the Middleway, but this is to be transferred to the Local Authority as part of the Section 106 agreement. If considered to be a better option, this new route could avoid additional traffic onto the Middleway, and better connect the site to the wider Picket 20 neighbourhood.

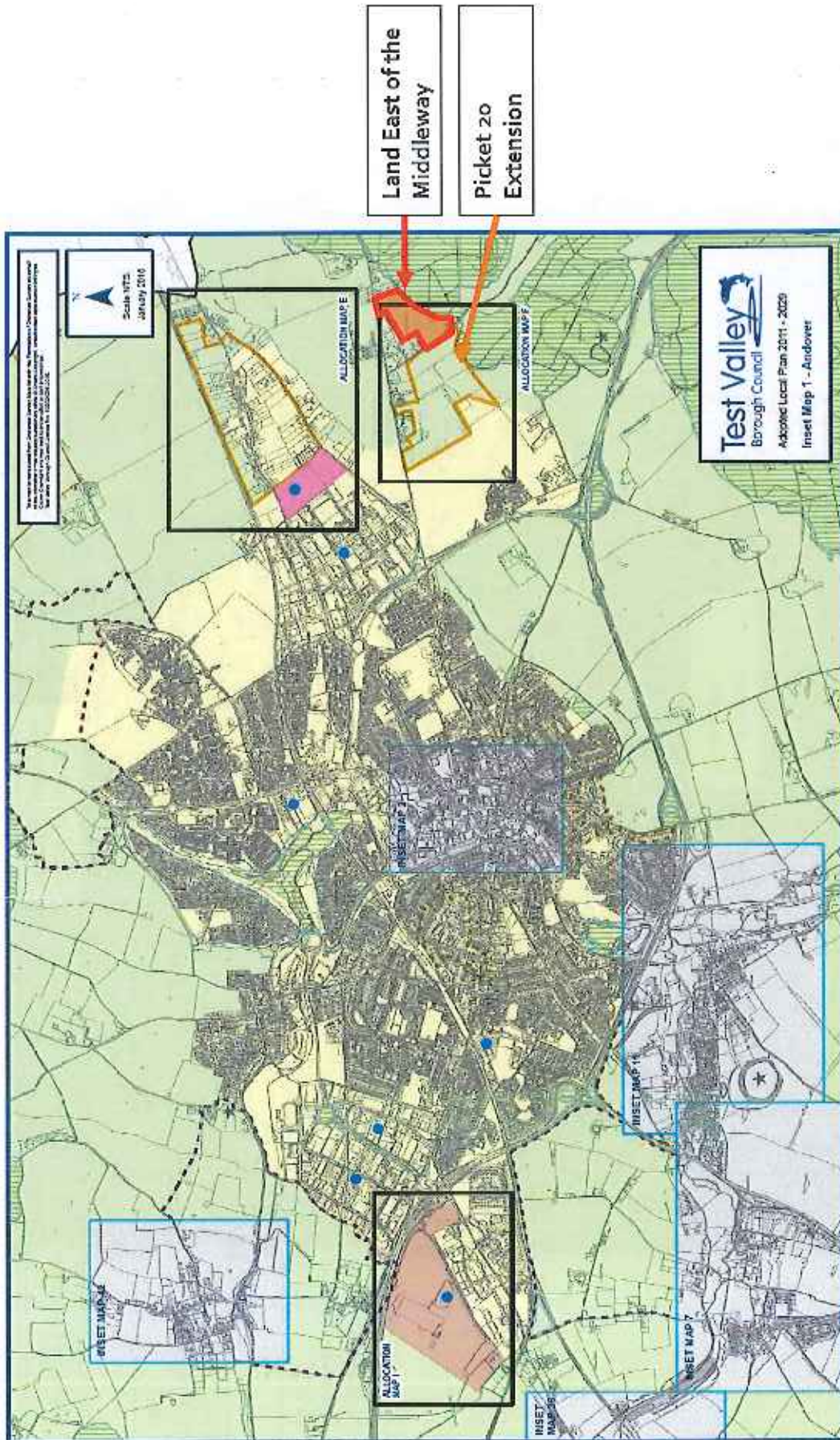
The site is well located in terms of its proximity to the established Picket 20 neighbourhood. This means new residents will have easy access to the Local Centre, Primary School facilities and Urban Park which have already been developed. The Picket 20 extension approval has a number of footpaths that are designed to run to the Middleway, one of which could easily carry on through into the subject site.

Conclusions

The Company believes that land East of the Middleway provides a positive opportunity to expand an established neighbourhood in Picket 20 by a further 250 units. This site is already bordered by residential development, with further development approaching by way of the permitted Picket 20 extension currently under construction. The site is well screened, and landscape impact is likely to be minimal. It has good access options, and the ability to connect into the existing neighbourhood for both vehicles and pedestrians, subject to Council approval.

Persimmon Homes would welcome an opportunity to discuss our proposal with Council Officers in the near future.

Annex 1 – Site Location Plan



Annex 2 – Illustrative Land Use Plan

