



TEST VALLEY BOROUGH COUNCIL LOCAL PLAN REVIEW

Report by Intelligent Plans and Examinations (IPE) Ltd

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1.0 Introduction and context

- 1.1 Intelligent Plans and examinations (IPE) has been commissioned by the Planning Advisory Service (PAS) to provide advice to Test Valley Borough Council regarding the review of the Test Valley Local Plan (2011–2029) (TVLP).
- 1.2 The TVLP was adopted in January 2016. In mid-2018 the Council published an Issues and Options consultation document dealing with the question of the review of the TVLP. This was followed by a Refined Issues and Options document in June 2020. In April 2019 the Council adopted a new Corporate Plan entitled Growing our Potential. In September 2020 the Council approved master plans for Andover town centre and South of Romsey town centre. In June 2020 the Council approved a Climate Emergency Action Plan.
- 1.3 The Council is now seeking general support for its local plan review process taking into account the PAS Local Plan Route Mapper Toolkit Parts 1 and 2. The review process includes consideration of the possible content of the next local plan, the scale of review that is necessary, the associated risks and the requirements of the Duty to Cooperate (DtC) legislation.
- 1.4 The Council considers that the key issues for the next local plan can be listed under the following headings:
 - Housing distribution
 - Housing mix, density and design standards
 - Building standards
 - Employment land
 - Town centres and retail policies including town centre master plans
 - Climate Change including renewable energy and flood risk
 - Biodiversity including mitigation
 - Sub regional planning
 - Health and well-being
 - Infrastructure
 - Skills and training

Clearly this is a general list that covers a very wide range of topics.

2.0 Review

- 2.1 Prima facie the above list suggests that the review of the local plan will need to be extensive and fundamental. However, on a closer analysis it is evident that the existing local plan policies either in their present form or with relatively modest alterations adequately deal with a number of the issues detailed by the Council. The PAS Toolkit provides a valuable initial assessment of which parts of the existing plan need to be reviewed and which parts can be carried forward with relatively little change. Bearing in mind the limited resources available to local authorities it is important that

any review of the existing plan takes a realistic view of what needs to be changed.

- 2.2 The June 2020 Issues and Options consultation document could potentially give the impression that the current local plan needs to be fundamentally changed. However, it is considered that this is to an extent misleading. Based on the PAS Toolkit it is clear that many of the existing policies are proving to be effective. For most local plans, issues around housing, employment, environmental protection and infrastructure are amongst the most critical, not least because these matters have important implications for the delivery of sustainable development.
- 2.3 In relation to housing in the last four years the Council has delivered just under 4000 new dwellings, well in excess of the existing local plan requirement of 588 dwellings per annum. Both the housing delivery test and the affordable housing target have been met and as at April 2020 the Council had more than a five year supply of housing land in both of the housing market areas as defined in the local plan. Based on the latest (December 2020) Government standard method for calculating housing need, the requirement figure for Test Valley is 550 dwellings per annum. In quantitative terms therefore there is nothing to suggest that there will need to be a major change in the approach adopted for the delivery of housing. However even if there is no change in strategy the new local plan will need to identify additional housing sites in line with the strategy to ensure that the Council is able to maintain an adequate supply of housing land.
- 2.4 As regards the distribution of additional housing within the district the current plan divides the district into two housing market areas (HMAs) – the Northern Test Valley HMA and the Southern Test Valley HMA. Based on job forecast data the existing plan contains a 67:33 split between the northern and the southern HMA. Within the northern HMA there is a concentration of development at Andover while in the southern HMA the concentration is at Romsey. This distribution is not surprising given that the settlement hierarchy regards these two towns as the major centres within Test Valley. Key service centres are Charlton, Stockbridge, North Baddesley, Nursling, Rownham and Valley Park.
- 2.5 The 2020 Issues and Options consultation document raises the question of whether it is appropriate to have two HMAs, whether the boundary is the right boundary if the two are maintained and whether the distribution of new housing development between the two areas should be maintained. The consultation document also raises questions about the settlement hierarchy and settlement boundaries. A significant change to the present broad strategy of focussing most of the housing development at/around the two major centres in the Borough is likely to have the consequence of requiring a full review of the TVLP. Similarly, a full review would probably be required if there were to be a reversal in the split of new housing between the north and south of the Borough. A full review would be necessary because of the way a significant change in strategy would impact on the other policies in the plan. However even in a full review it

should be possible for many of the generic development management policies to remain unchanged where experience has shown that they serve their purpose.

- 2.6 How new housing is distributed is described in the Issues and Options document as “one of the key decisions” for the new local plan. It is noted that in the consultation responses to date there is majority support for maintaining separate HMAs, with possibly a revised boundary. The boundary review seems to favour an enlarged southern HMA with support for a wider distribution of housing on smaller sites to a larger number of settlements, including rural villages. Adopting a materially revised strategy based on a wider distribution of housing is likely to have significant consequences, not least for sustainability considerations. The Council will need to be satisfied that, if followed, a strategy of more widely dispersed development does not compromise the sustainability of the plan. The scale of risk in this regard will probably depend on the how much/how widely housing development is dispersed. Any unresolved tension between the strategy adopted and the sustainability appraisal would represent a considerable risk at a local plan examination.
- 2.7 The allocation of housing numbers to neighbourhood plans can probably be dealt with through a partial review process but a full revision may be required if the Council revises the strategy in the way that has a major impact on neighbourhood plans. At present there is one made neighbourhood plan in Test Valley, three have passed examination and are awaiting referendum and a further 11 are being prepared.
- 2.8 In relation to the economy the Council has not identified any significant problems with the existing planning policies. It is understood that the Council has already undertaken a study of existing Strategic Employment Sites and has cooperated with the Solent and the M3 Local Enterprise Partnerships in reviewing the employment aspects of the TVLP. The Partnership for South Hampshire has also been involved in the preparation of the up-to-date employment evidence base. The existing policy relating to the balance of net out commuting is to be maintained and the housing growth is linked to the forecast employment growth. On the basis of this information it is reasonable to conclude that employment considerations can be relatively simply dealt with through a partial update of the TVLP.
- 2.9 Master Plans have recently been adopted for both Andover Town Centre and South of Romsey Town Centre. These Master Plans that supplement the existing policies in the TVLP are intended to deliver a broad range of improvements to these town centres. The policies for these town centres should be revised to reflect the proposals in the recently adopted town centre master plans. Given the changes that are occurring in the retail sector and the general concern about the vitality of town centres it may be the appropriate for the Council to consider putting more emphasis on the introduction of residential development in the town centres, particularly in Andover where it appears that there may be more scope for introducing additional housing into the town centre. At present in the TVLP there is reference to a mixed development to include residential on

the site at George Yard/BlackSwan Yard. The Council should consider whether there are further opportunities that can be included in the revised local plan. The scope for additional residential development in Romsey town centre appears to be more limited and may be restricted to the 30 units referred to in the Master Plan at the Fishlake site. Nevertheless, the matter should be given consideration in the preparation of the revised local plan. Expanding the town centre policies in line with the master plans could be dealt with through a partial review of the plan

- 2.10 It is noted that no infrastructure projects critical to the delivery of the current local plan policies have stalled or failed and that the existing Infrastructure Delivery Plan is currently being reviewed. Unless the review throws up the need for a substantial change to the provision of infrastructure in the Borough it seems unlikely that infrastructure considerations would necessitate a complete revision of the existing local plan.
- 2.11 As regards the environment, the Issues and Options consultation emphasises that climate change will be a key theme running through the whole local plan. The existing chapter in the TVLP is relatively comprehensive as regards protecting the environment and includes policies on Green Infrastructure and Water Management. There is a Biodiversity Action Plan in place and a Landscape Character Assessment. A new Strategic Flood Risk Assessment is to be jointly prepared through the Partnership for South Hampshire. Given the very limited area of the Borough that includes the Test estuary, coastal flooding and erosion are not a significant consideration for the authority. Overall it is considered that environmental considerations do not seem to require a wholesale review of the plan although the existing policies could usefully be reinforced in some limited instances – for example by introducing a policy for electric vehicle charging points. However, the Council does not have a strategic level renewable energy strategy. This is a matter that could be addressed in parallel with a partial review of the local plan.
- 2.12 The Council has used the PAS Toolkit Part 2 to assess how effective the existing local plan has been in relation to the National Planning Policy Framework (NPPF). This assessment has identified some areas where changes to the TVLP would be desirable, including policies for entry level housing sites, self-build and market housing on rural exception sites. There are other issues/topics identified which are included in the NPPF but which are not, on the basis of local experience, a problem in the area or are adequately dealt with in the supporting text to the TVLP. These include estate regeneration, markets, aviation, Rights of Way and overnight lorry parking. The small number of other changes identified by the Council on the basis of the NPPF including the question of minimum density standards, the provision of 10% of housing on small sites and the identification of strategic and non-strategic policies are unlikely to require more than a partial review of the plan. There are also some subjects, outstanding, for example, innovative design proposals in rural areas, that the authority reasonably say can be adequately dealt with by reference to the NPPF. The Council considers that it may need to review how design

considerations generally are dealt with. This is a matter that could probably be satisfactorily dealt with by Supplementary Planning Guidance. Changes in legislation relating to matters such as permitted development rights and the use classes order should not require more than a partial review of the TVLP.

- 2.13 There is no single right way of using the PAS Toolkit. It is intended as an aid for authorities to use as they see fit. This review of how the Council has used the Toolkit clearly cannot take into account the extensive evidence that the Council has of how the LP is performing. Consequently it cannot be regarded as definitive but it is considered that the Council has used the PAS Toolkit material in a positive and constructive way that has had regard to the NPPF. Based on the assessment done by the Council and the success of the TVLP for development management purposes, it seems likely that a partial review of the TVLP may well be sufficient. This conclusion is based on the assumption that the broad strategy of the plan remains largely in place. In such a situation the bulk of the strategic policies that were found sound at the local plan examination are unlikely to change materially and can expect to continue to enjoy the full status of adopted development plan policies. However, if the strategy moves away from the present concentration of development in selected locations to one of a general dispersal of development widely over the Borough a full review of the plan will probably be needed. In such a situation the plan would need to include fuller details of housing numbers in the rural parts of the Borough
- 2.14 The council has provided an assessment of how the TVLP would need to change should the Planning Reform White Paper proposals be introduced. Clearly the White Paper envisages a fundamentally different approach to local plans. The White Paper proposes a visual map based plan with rules rather than general policies. However, it is not yet known what changes may be made to the White Paper proposals as a result of the consultation that was carried out or when changes may be introduced. At present the Government is stressing the need for authorities to get up-to-date plans based on the present system in place by the end of 2023. The message that authorities should get on with their existing local plan work was recently repeated in the Ministerial Statement (19 January 2021) from the Minister of State for Housing.¹ At this stage the Council should proceed with getting the existing local plan reviewed/updated and not spend time and resources on a "White Paper style" local plan.
- 2.15 In relation to the DtC the Council will be aware that the Planning Inspectorate has recently been taking a very robust approach to its assessment of the DtC. The information provided by the Council states that there have been no requests from neighbouring authorities for assistance under the DtC and that the Borough Council believes that it can accommodate its own needs without having to seek assistance from others. In these circumstances there should be no difficulty in making the

¹ <https://www.gov.uk/government/news/councils-urged-to-ensure-local-plans-are-up-to-date>

case that the DtC has been met. However, it is noted that the next local plan will be taking account of a new joint Statement of Common Ground prepared by the Partnership for South Hampshire. The Council will need to be alert to any change in the DtC situation that might flow from the proposed new Statement of Common Ground.

3.0 Conclusion

- 3.1 The way the Council has used the PAS Toolkit is, as far as we can tell without a full and detailed knowledge of the implementation of the LP, sensible and comprehensive. Based on the Council's assessment the current TVLP is providing a sound basis for planning in the Borough and there appears to be no reason why a partial review of the plan supported by an up-dated evidence base should not prove to be adequate for planning the Borough in the future. Even with a partial review there will be difficult decisions to be made about matters such as housing land supply but, provided that the overall strategy does not change significantly, there should be no reason for the Council to spend time and scarce resources on a fundamentally different plan. The broad strategic policies in the plan should largely retain their current weight if the overall strategy of the plan remains unchanged.