

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

8 January 2019

Dear Sir/Madam

KING'S SOMBORNE NEIGHBOURHOOD PLAN | SUSTAINABILITY APPRAISAL INC STRATEGIC ENVIRONMENTAL ASSESSMENT SCOPING REPORT

We write on behalf of TARMAC Limited ('TARMAC') in response to the consultation to the Scoping Report ('the Report') supporting Sustainability Appraisal, incorporating Strategic Environmental Assessment (SA/SEA), of the emerging King's Somborne Neighbourhood Plan ('the Plan').

TARMAC is a global building materials company and leading supplier of cement, ready mixed concrete and aggregates. In the UK, TARMAC owns sites and land that have ceased to be in an operational use which are now being promoted for alternative land uses, one of which is within the King's Somborne Neighbourhood Plan boundary. The extent of their ownership is shown on the plan appended to this letter.

The site is located approximately 1km north of the village of King's Somborne and is self-contained through mature and established areas of trees and vegetation on all sides. There are a number of operations on-site including an asphalt plant and a timber distribution yard. There are also a number of buildings / structures in association with these uses including an office and a shed used for bagging of material. Site levels vary across the Site and access is obtained via a track off Cow Drove Hill to the east.

1 Legal Framework

In order for a neighbourhood plan to meet the basic conditions at examination¹ it must be compatible with EU obligations, as well as demonstrate its contribution to the achievement of sustainable development. Accordingly, TARMAC supports in principle the positive approach taken by King's Somborne Parish Council ('the Council') through the production of an SA/SEA to accompany the emerging Neighbourhood Plan.

The legal obligations in relation to SA/SEA derive from European Union law set out in Directive 2001/42 which are transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 ("the 2004 Regulations").

Whilst not part of the legal requirement of neighbourhood plan making, in undertaking an SA/SEA, the Council should have consideration for key provisions within the 2004 Regulations. This includes those in relation to the consultation on, and preparation of an environmental report. In particular, we highlight the following provisions:

¹ Set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004

- i. Regulation 8 - A plan cannot be adopted unless account has been taken account of a (lawfully produced) SA/SEA Report and the opinions expressed through consultation;
- ii. Regulation 12 - An SA Report must identify, describe and evaluate the likely significant effects on the environment of the Plan itself and the reasonable alternatives taking into account the objectives and the geographical scope of the Plan;
- iii. Regulation 13 – the SA Report must be made available for consultation as ‘soon as reasonably practicable after the preparation of the relevant documents’. Consultation shall include both the defined consultation bodies (defined in Regulation 5 as the Countryside Agency [now part of Natural England], English Heritage [now Historic England], English Nature [now Natural England] and the Environment Agency) and public consultees.

We support the Council in seeking this early engagement and look forward to discussing how TARMAC can assist in the assessment of the Plan in relation to the landholdings at How Park in line with the 2004 Regulations.

In addition to this, it is crucial the Council considers the wider ‘basic conditions’ set out at paragraph 8 of Schedule 4B to the Town and Country Planning Act 1990 (as amended). This include compliance with national policies, namely the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).

The Neighbourhood Plan is also required to comply with the strategic direction of the Test Valley Development Plan. Given the anticipated aligned timescales, this will involve consideration of both the adopted Test Valley Borough Revised Local Plan DPD, and the relevant policies of the Borough Council’s ‘Next Local Plan’.

2 The Scoping Report Objectives

The Neighbourhood Plan should consider the key role it can play in guiding the delivery of both affordable and market homes, to meet both specific affordable housing needs² and to address acute affordability issues locally.

Paragraph 3.4.4 of the Report highlights the average house price in Kings Somborne was £612,861 as of October 2018, this compares to a figure of £323,811 for Test Valley Borough from November 2017. This equates to a median house price to median gross annual workplace-based earnings ratio of 10.7, compared to 7.3 nationally. Applying this to the house prices in Kings Somborne, this ratio would rise up close to 20 times workplace earnings of those in the Borough.

Accordingly, TARMAC supports the principle of Objective 1 in seeking to ensure everyone has the opportunity to live in an affordable home; however, we consider that this needs to also recognise the role the delivery of market housing has in addressing ‘affordability’, on top of the role affordable housing plays in meeting needs of specific individuals.

Additionally, this should extend to the benefits specialist care and/or retirement can have in encouraging downsizing of elderly people and results in the freeing up of family housing to the market. This is recognised in the Report as a key demand but is not reflected within the SA/SEA Objectives.

Paragraph 3.4.9 of the Report highlights these key sustainability issues that can result if the Plan does not positively plan for them. The loss of younger people, couple with an ageing population leads to an imbalanced community, particularly in rural areas, and runs contrary to the NPPF³.

The Report also highlights the need to support new existing and potentially increase local services. As is the case with many rural villages, the provision of additional housing will help support the vitality and viability of these rural services. The assessment undertaken by Objective 2 queries whether the Plan will “*support existing facilities and services in the village*”. In order to be robust, this should recognise both this benefit of new housing and the risks associated in a lower provision to the vitality and viability of local facilities.

² As defined by the NPPF – housing for sale or rent, for those whose needs are not met by the market.

³ See specifically Paragraphs 61, 62, 72, 78

Similarly, the Parish does not benefit from any significant, or even notable, employment space for residents. Combined with limited public transport options, this results in a reliance on private car use over significant distances for day-to-day trips.

Accordingly, TARMAC supports the tests of Objective 4 to enhance the local economy and support job creation. This can be linked to the tests of Objective 5, with the enhancement of local employment opportunities reducing the distances local people need to travel to access work.

Paragraph 3.13.5 recognises the limited previously developed sites within the Parish, highlighting the likelihood that future development will have to occur on greenfield sites. TARMAC supports Objective 9 in seeking to make the most efficient use of land recognised to meet the development needs of the Parish and Borough. Furthermore, we support the recognition of sites of low environmental value.

3 Next Steps and Conclusions

It is appreciated that the Report forms just Stage one ('A') of five ('A-E') of the SA/SEA informing the emerging Plan. Indeed, the SA/SEA process is one that should run throughout the development of the Neighbourhood Plan, right up to its adoption.

TARMAC supports this early engagement, as is required within the 2004 Regulations. However, it is noted that Stage B - Developing and refining alternatives and assessing effects – is also a key step in the SA/SEA process. Furthermore, the Report at present gives no indication of the specific assessment methodology, beyond the broad qualitative questions provided. It is crucial that this stage is robust and consultation undertaken if the SA/SEA is to meet the tests set out in Regulations 12 and 13 of the 2004 Regulations.

Land at How Park forms one of, if not the only currently operated site in the Parish that is available and deliverable for development. TARMAC wishes to work with the Council to ensure the assessment undertaken to support the Plan is done to standard, and the potential of this site to deliver much needed housing and/or employment development is realised.

We thank you for the opportunity to comment on the Scoping Report for the SA/SEA to support the emerging Neighbourhood Plan. We trust the contents of this letter are clear; however, should you have any questions then please do contact us in the first instance.

We would appreciate confirmation as to receipt of these representations, and confirm our wish to participate in each stage of the Neighbourhood Plan consultation going forward.

Yours Sincerely,

Kieron Gregson
Associate

APPENDIX 1: SITE LOCATION

