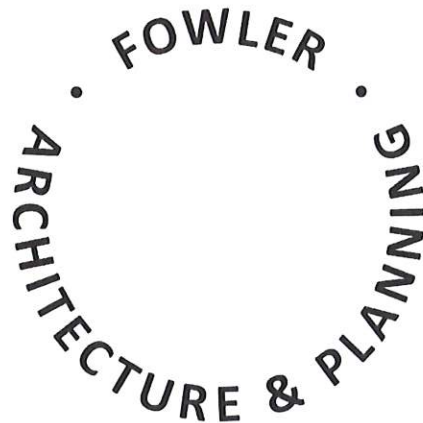


Our Ref: AS/180916/P4

27 August 2020

Planning Policy
Test Valley Borough Council
Beech Hurst
Weyhill Road
ANDOVER
Hampshire
SP10 3AJ



Dear Sirs,

'Refined Issues and Options Consultation' (June 2020) for the next Test Valley Borough Council Local Plan

On behalf of Vivid Housing Limited

On behalf of '**Vivid Housing Limited**', Fowler Architecture & Planning Ltd is pleased to have the opportunity to respond to the Next Local Plan Refined Issues and Options Consultation and engage in the process of preparing the next Local Plan (LP) for the Borough.

Our client's interest relates to '**Land at Barrow Hill, Goodworth Clatford**'. The site extends to approximately 2.9 hectares of greenfield land and is immediately available for development and deliverable¹. The site is known to the LPA as part of the SHELAA (2018) under site references SHELAA64 'Land at Barrow Hill' and SHELAA216 'Land south of Barrow Hill' with potential for between 30 and 87 dwellings.

Vivid Housing Limited therefore wish to respond to the consultation to the questions that are of most relevance to their interests.

General (including paragraphs 5.30 to 5.35)

The impacts of planning reform are of great importance for the LP, which is not scheduled for adoption by the December 2023 deadline for all local authorities to have an up to date local plan.

The Refined Issues and Options consultation paper pre-dates, and does not reflect, the publication of the Planning for the Future White Paper in August 2020 (including zoning classifications and the removal of local development management policies) and the separate technical consultation on changes to the planning system, including a proposed approach for the standard method for assessing local housing need (LHN). These reforms must be addressed by the Council as the current timetable for the preparation of the LP will not engage the transitional provisions enabling the LP to be examined on the basis of existing Government policy.

¹ See 'Land at Barrow Hill, Goodworth Clatford – Vision Statement' dated April 2020

In the March 2020 release, the latest median workplace-based affordability ratio for Test Valley Borough Council area is 9.95 in 2019 and 8.22 in 2009. This indicates that affordability is clearly worse in Test Valley in comparison to England which had a 7.83 affordability ratio. Affordability issues affect local residents trying to buy a home remain acute, particularly for the younger demographic.

When looking at a linear forecast, as illustrated above, we can see that the projection suggests an increasing affordability gap in future years. This indicates that the Council should continue to maintain affordable housing delivery among its key priorities and in that context the local housing need is to be adjusted to take into account the affordability gap. The Government's preferred approach for the standard methodology to calculate the local housing need now removes the cap on growth that is required to be delivered to address affordability pressures, which would result in the LHN for the Borough to increase from 550 units per annum to 813 units per annum, a 47% increase. While this figure is broadly in-line with average delivery over the last 3 years, it nonetheless will represent a step-change in policy response to maintain this figure over the lifetime of the LP.

The delivery of affordable housing is counted on the basis of gross completions, not net of any losses. While the target of 200 homes per year has been achieved across the past 6 financial years (target of 1,200 but delivery of 1,441), 76% has been in the North of the borough and primarily resulting from large development site opportunities. 95% of the delivery has been in urban areas. Just 5% has been in the rural areas with a declining rate of completions from 28 in 2015/16 to 6 in 2018/19, an average of 11.3 per annum. This 11.3 per annum includes all typologies of affordable housing. No rural exception sites have come forward in recent years – the last delivered 12 units in 2015/16².

The latest evidence of housing need for rural Test Valley on the register is around 600 households in need of rented affordable housing. This includes a need from 18 households in Goodworth Clatford, 23 in Upper Clatford and 25 in Abbots Ann. Given the current delivery of all typologies of affordable housing averages at 11.3 units per annum in rural Test Valley, any rolling forward of the current ineffective policies will ensure these needs will not be met when needed (i.e. now) or let alone within the Plan-period by 2036. The only alternative for rural residents in dire housing need will be to leave the communities in which they live and have grown up and move to the main centres, or outside of the Borough, to find affordable homes. This is plainly not what the Government seek to proliferate as housing supply must be boosted across all communities to readdress the inherent affordability imbalances.

Delivering new housing opportunities in all communities, both urban and rural, remains vital, and particularly affordable housing that meets identified local need. The existing spatial and delivery strategy is ineffective because communities have very rarely taken full advantage of rural exception and community-led development policies. Neighbourhood plans in Test Valley under preparation and have been made that do not plan for housing in the manner envisaged by paragraph 69 of the Framework. Furthermore, windfall development coming forward within the settlement boundaries is typically of a scale below the affordable housing threshold meaning few opportunities to secure affordable housing by legal agreement. It

² Source – Test Valley Borough Council Housing Strategy Evidence Base & Review of Homelessness December 2019

must therefore be the right time for a dispersed delivery strategy for a large number of small and medium sized allocations in rural Test Valley, including at Goodworth Clatford, that will facilitate affordable housing delivery as part of mixed tenure schemes that will also meet open market and self-build needs.

The Council through the emerging LP and its partners, such as Vivid Housing Limited, must continue to deliver new housing locally, of all tenures, and to support our most vulnerable residents along with those on low incomes. The overall emphasis of the plan objectives and the policy response must therefore change.

Q1: Options for HMAs

It is disappointing to see the consultation focusing 3 questions on housing market areas. Under the previous planning system, plan-makers were required to define housing market areas (HMAs), which were usually larger than local authorities. HMAs in effect were areas of search, bringing together residential locations that the typical resident would regard as reasonable substitutes for one another. Authorities sharing an HMA were expected to produce joint housing needs assessments covering that area as a whole, and if any authority's needs could not be met within its own boundaries then other parts of the HMA were expected to accommodate the resulting unmet need.

In the current National Planning Policy Framework (NPPF) (issued in February 2019), and Planning Practice Guidance (PPG), the concept of housing market areas as the geography to derive need no longer exists.

The LP must instead be evidenced by a local housing need assessment (LHNA), conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

No LHNA has been published to support this consultation.

Paragraph 65 of the NPPF confirms the housing requirement figure must be established for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.

The NPPF and the PPG do not envisage, or advocate that separate HMAs will be created.

As such, option (b) for a single Borough-wide figure must be taken forward as the preferred strategy.

Your consultation paper does not recognise in the options under Q1 that the NPPF requires that within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations – as you state at 5.20 to 5.23

Given the existence of 16 designated neighbourhood areas, your LP should disaggregate the housing requirement figure to these designated neighbourhood areas with a timescale to bring forward plans to meet the requirements. This will ensure communities properly engage with paragraph 69 of the Framework when preparing their neighbourhood plans.

Q2: HMA relationships with settlements beyond Borough boundaries

See answer to question 1 concerning the deletion of HMAs as the geography to derive need in national policy and guidance. There are undoubtedly cross-boundary implications for the LP, however the Framework and PPG are clear that each authority should meet its LHN.

Q3: Using parish boundaries to define HMAs

As previously reasoned, there is no need or justification to define separate HMAs within the Borough.

Q4: Steps of the settlement hierarchy

The Government is clear that a wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness. Continuation of a hierarchy approach may be justified, however there will be a range of factors that determine the steps and the position of settlements within a hierarchy, as answered under Q5.

Q5: Position of settlements within the hierarchy

The Framework at paragraph 77 confirms in rural areas *“planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.”*

In doing so, paragraph 78 confirms that *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”* thereby avoiding isolated homes in the countryside.

In addition, paragraph 78 requires LPAs through their planning policies that they *“should identify opportunities for villages to grow and thrive, especially where this will support local services.”* Whereby this assessment must have regard to the shared role of groups of smaller settlements where development in one village may support services in a village nearby.

To ensure a sound plan, the LP must further understand the needs and function of the rural communities; which accounts for a very significant element of the Borough's total population. This is against the backdrop that PPG³ confirms the relevant issues for local planning authorities when determining the roles which all rural settlements can play in delivering sustainable development.

I recall the Settlement Hierarchy Topic Paper (June 2014) for the Revised Local Plan focused on identifying the range of public facilities and services to each settlement as determinative of identification of a settlement boundary and position in the hierarchy.

This is not a positive approach in really tackling the national housing crisis and perpetuates restricted growth in rural areas and the resultant loss of local services and facilities.

It is therefore appropriate and proportionate for the LP to give full consideration of the following matters as required by the Framework in determining where growth should be distributed:

³ Paragraph: 009 Reference ID: 67-009-20190722

- Assessing evidence of local housing need.
- An understanding of the level of development required to support a thriving rural community by ensuring local services and facilities remain, or become viable.
- Assessing the availability of land within the SHELAA.
- Assessing the implications of delivery in locations where the Framework NPPF indicates development should be restricted.
- Assessing the dual role many settlements provide in delivering services to nearby settlement, and the benefits of development in one village supporting services in a village nearby.
- Recognising the value of the LP delivering a greater percentage of the overall housing requirement within the most sustainable villages.

In relation to **demographic and spatial considerations** relevant to **Goodworth Clatford** in determining whether a housing allocation(s) should be identified at the settlement, the settlement has a population of 764 according to the Hampshire Small-Area Population Forecast (SAPF) 2016-based estimate. The base of the SAPF is taken from the 2011 census. The estimated population of the parish in 2016 equates to 0.61% of the borough's total of 123,446.

Table 1 - Census (2001 & 2011) and Estimated Population and Dwellings in Goodworth Clatford Parish 2016-2023 (Hampshire SAPF 2016-based)

	2001	2011	2016	2017	2018	2019	2020	2021	2022	2023
Population	740	760	754	748	741	733	728	723	715	711
% change over 2011			-0.8%	-1.6%	-2.5%	-3.6%	-4.2%	-4.9%	-5.9%	-6.4%
Households	309	332								
Dwellings	325	345	335	356	357	358	360	362	363	365
Persons per dwelling	2.28	2.20	2.25	2.10	2.08	2.05	2.02	2.00	1.97	1.95

Table 1 shows growth in the population of the parish of 20 usual residents between 2001 and 2011 (2.7%). Within this period the number of dwellings also increased by 20 units, however the occupancy rating of dwellings declined from 2.28 to 2.20 persons per dwelling. As a result, fewer people live in each property and this trend is projected to continue to 1.95 persons per dwelling in 2023 based on the SAPF estimate. The table also shows an estimated decrease in population of 49 persons (-4.6%) in the period 2011-2023 based on the SAPF. The SAPF estimate also forecasts a minor growth of 20 dwellings from 345 to 365 in this period. The minor annual increment in dwellings and a declining population highlights a general trend towards declining household size. A 6.4% decline in population contrasts with a projected increase in the population of the Borough in the same period to 134,669 persons. A population decline is also projected across the ward of Anna by 3.3% up to 2020⁴.

⁴ Anna Ward Profile 'Key Population Information' page 3

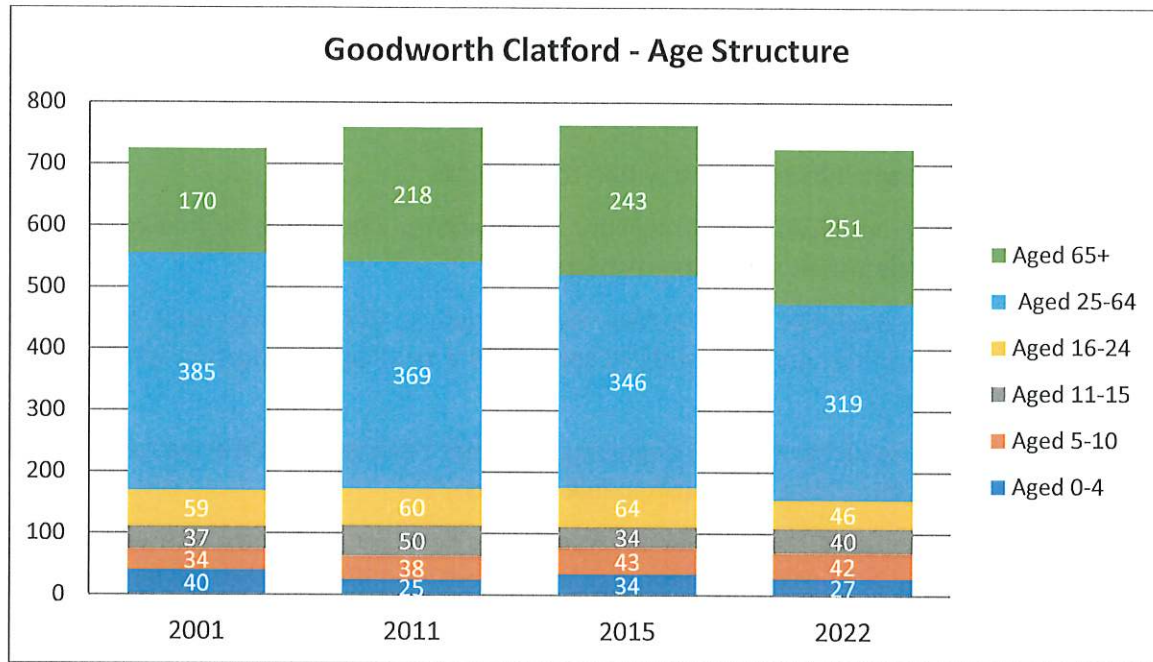


Figure 1 – Goodworth Clatford Parish Age Structure [Source 'Age' 2001 Census (UV04) 'Age by Single Year' 2011 Census (QS103EW)] and Hampshire SAPF Forecasts for 2015 and 2022

Between 2001 and 2011, Figure 1 (overleaf) shows Goodworth Clatford has seen the largest numerical growth in the retirement age population (65+) of 48 persons. Increases were also witnessed in persons aged 5-10 (4 persons), aged 11-15 (13 persons) and aged 16-24 (1 person). Two groups surveyed had a numerical decrease of -15 in those of nursery age and -16 aged 25-64.

Figure 1 includes the forecast population figures for 2015 and 2022 from the SAPF to provide a future demographic context. This forecasts an overall decline in the population to below 2001-levels arising from the reduction in the working-age population. The overall number of persons aged 0-15 is forecast to decline from 111 in 2011 to 109 in 2022, the working aged population 16-64 will decline by 14.9% from 429 in 2011 to 365 in 2022, whereas the retirement aged 65+ will increase by 15.1% from 218 in 2011 to 251 in 2022.

Figure 2 below shows the age groups in Goodworth Clatford by proportion in the 2001, 2011, 2015 and 2022 samples. Primary-aged persons aged 0-10 is projected to decline from 74 persons to 69 persons, a decline of -6.8% by 2022. Young persons (0-15) comprised 14.9% of Goodworth Clatford's population in 2011; this is expected to increase slightly to 15.0% by 2022.

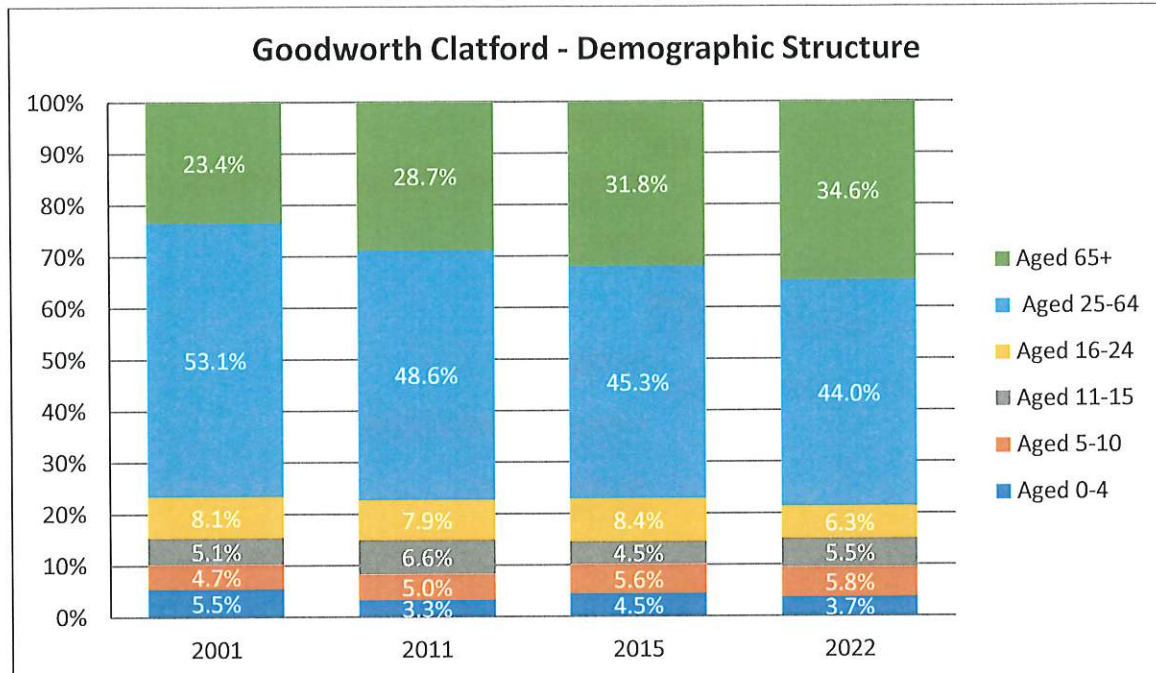


Figure 2 – Goodworth Clatford Demographic Structure [Source ONS Census Data 2001 & 2011] and Hampshire SAPF Forecasts for 2015 and 2022

In terms of the working aged population, young adults (16-24) comprised 7.9% of Goodworth Clatford's population in 2011; this is expected to decline to 6.3% by 2022. The upper segment of the working aged population (25-64) comprised 46.8% of total population in 2011; this is expected to decline to 44% by 2022. Overall, the working aged population would decline from 56.5% in 2011 to 50.3% in 2022.

Those aged 65 and over comprised 28.7% of Goodworth Clatford's in 2011; this is expected to rise to 34.6% by 2022.

The Housing Needs Survey of Goodworth Clatford (undertaken in 2013) pinpoints the reduction in working age population to young people and families moving out of the area in search of a more 'affordable' home.

Figure 3 below compares the growth rates of different segments of the population in Goodworth Clatford with Test Valley between 2011 and the SAPF forecast for 2022.

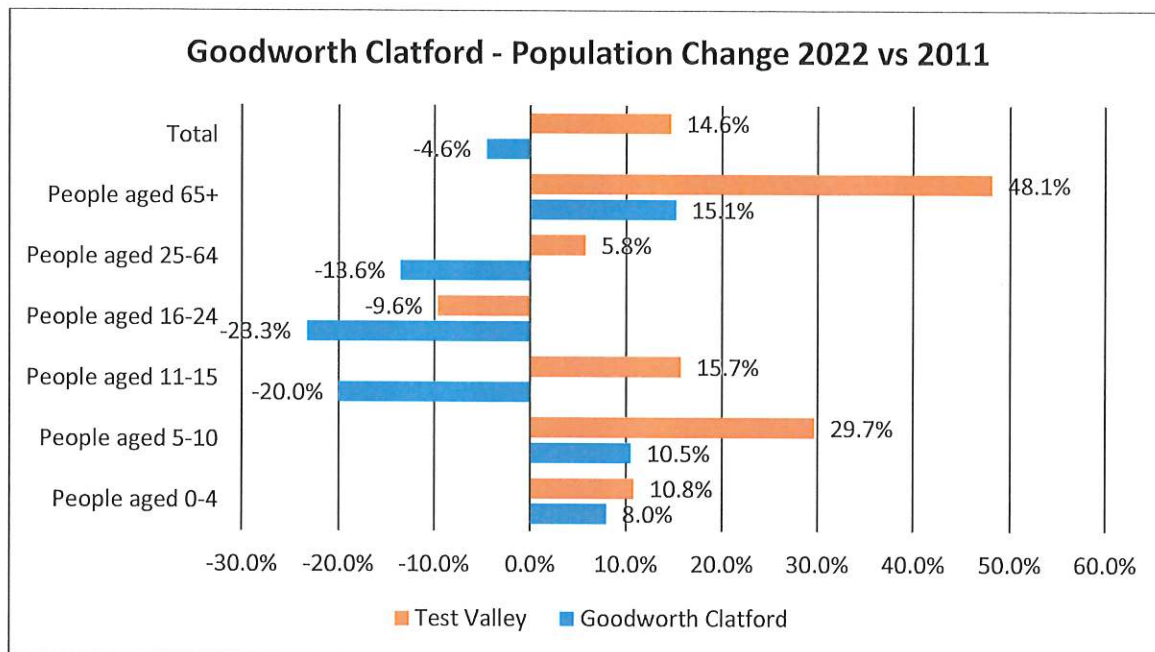


Figure 3 – Forecast Population Change Goodworth Clatford Parish and Test Valley Borough Council [Source ONS Census Data 2011 and Hampshire SAPF Forecasts for 2022]

Overall, the Borough is forecast to witness growth in all segments except persons aged 16-24. Goodworth Clatford is forecast to grow in those aged 0-4, 5-10 and 65+.

In Goodworth Clatford, the population aged 65+ is forecast to increase by 15.1%; this is less than the Borough which is expected to experience growth of 48.1% over the same period primarily because the parish already has a sizeable elderly population.

The decrease in the working age residents in Goodworth Clatford in both 16-24 and 25-65 age groups of -14.9% contrasts with 3.4% growth overall in Test Valley.

A decline of -20% in Goodworth Clatford for persons aged 11-15 contrasts with projected 15.7% growth in the Borough.

The increase of primary age persons of 10.5% in Goodworth Clatford is behind the Borough increase of 29.7%.

Finally, the 8% increase in the 0-4 age group reflects the Borough increase of 10.8%.

The demographic changes between 2001 and 2011 witnessing the growth of the retired population and reduction in the working aged population have important implications for Goodworth Clatford and how the settlement should plan to meet any housing needs. These changes are projected to continue beyond 2011 and the latest SAPF forecasts highlight the retirement aged population will be growing at a much faster rate than the Borough.

Figure 4 below shows the greatest levels of change in Goodworth Clatford in the period 2001 to 2011 has been the households comprising those aged 65+ with the highest increase (14.4%). The growth in the elderly population and decline in the working aged population has

resulted in the most significant reduction in those households with dependent children by -11.5%. The number of single person households has increased by 10%, which is less than the Borough average of 21.2%.

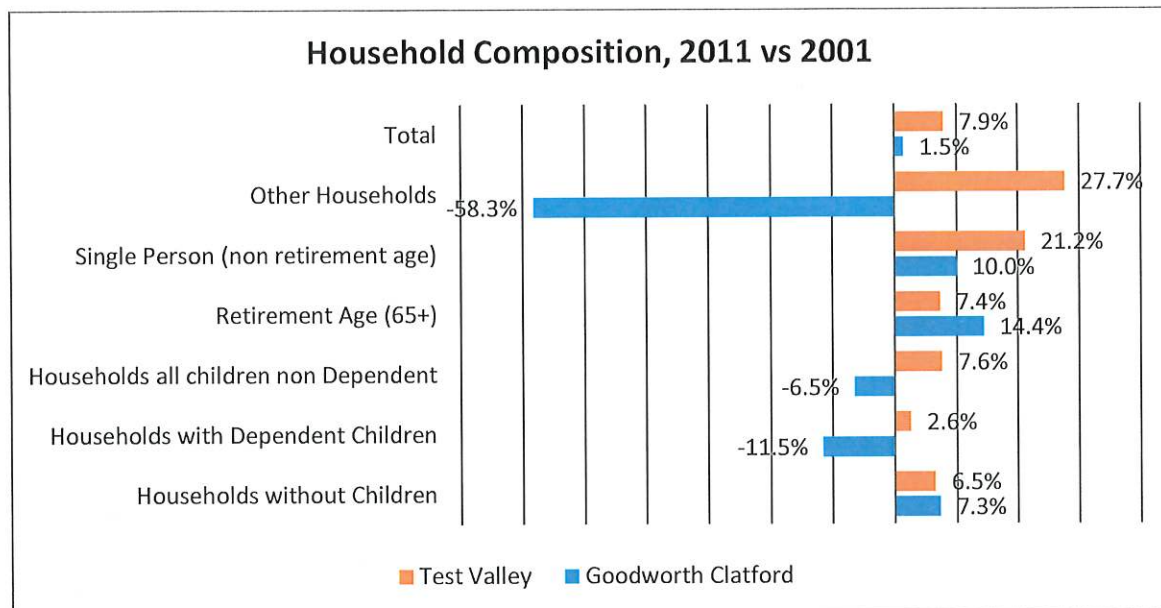


Figure 4 – Change in household composition 2011 vs 2001 [Source ONS Census Data QS113EW vs UV65]

Figure 5 below shows that the study area includes a marginally higher percentage of persons with long-term health problems or disability than the Borough averages. While this data does not quantify the specific problems or disabilities facing individuals, this may indicate a need for a specific percentage of homes to be provided under the Optional Housing Technical Standards (Category M4(2) and M4(3)) across a variety of tenures to meet likely future needs for housing for older and disabled people, which will increase over time owing to the projected growth in the older population.

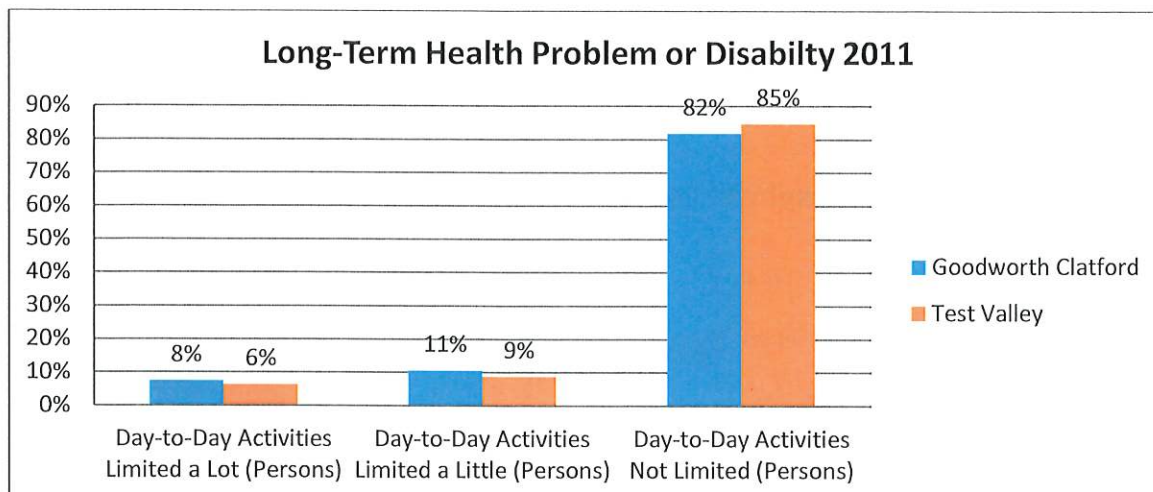


Figure 5 - Long-Term Health Problem or Disability [Source ONS Census 2011 QS303EW]

In terms of levels of deprivation in the study area, the 2011 Census assess all households in the area at the time of the 2011 Census with deprivation dimensions. The dimensions of deprivation are indicators based on the four selected household characteristics - Employment (any member of a household not a full-time student is either unemployed or long-term sick); Education (no person in the household has at least level 2 education, and no person aged 16-18 is a full-time student); Health and disability (any person in the household has general health 'bad or very bad' or has a long term health problem.); and Housing (Household's accommodation is either overcrowded, with an occupancy rating -1 or less, or is in a shared dwelling, or has no central heating).

Having regard to the above analysis in relation to the Goodworth Clatford study area, based on the parish, we consider there are four key population issues:

- A projected decrease in population to below 2001-levels with an estimated -6.4% decrease in population forecast in the period 2011-2023
- A forecast -14.9% decline (64 person) in the working age population 2011-2022
- A forecast 15.1% increase (33 person) in the proportion of the population aged 65+ 2011-2022
- Onward trend towards an ageing population and a declining household size arising from greater levels of home under-occupation (forecast 1.96 persons per dwelling in 2022 compared to 2.20 in 2011)

Having regard to the PPG⁵, it is considered that these population issues are likely to challenge the community to retain local services and facilities. The right type(s) of housing in response to these issues can be essential to ensure the viable use of facilities.

In relation to **housing considerations** relevant to **Goodworth Clatford** in determining whether a housing allocation(s) should be identified at the settlement, Figure 6 shows that Goodworth Clatford has a higher than average concentration of detached dwelling types (60.5%) compared to the Borough (38.7%) and also semi-detached dwelling types (29.2%) to the Borough (25.9%). Such an increase is not unexpected for a rural settlement and is reflective

⁵ ID: 50-001-20160519

of the general patter of higher density housing (i.e. greater apartments and terraced housing) within urban areas.

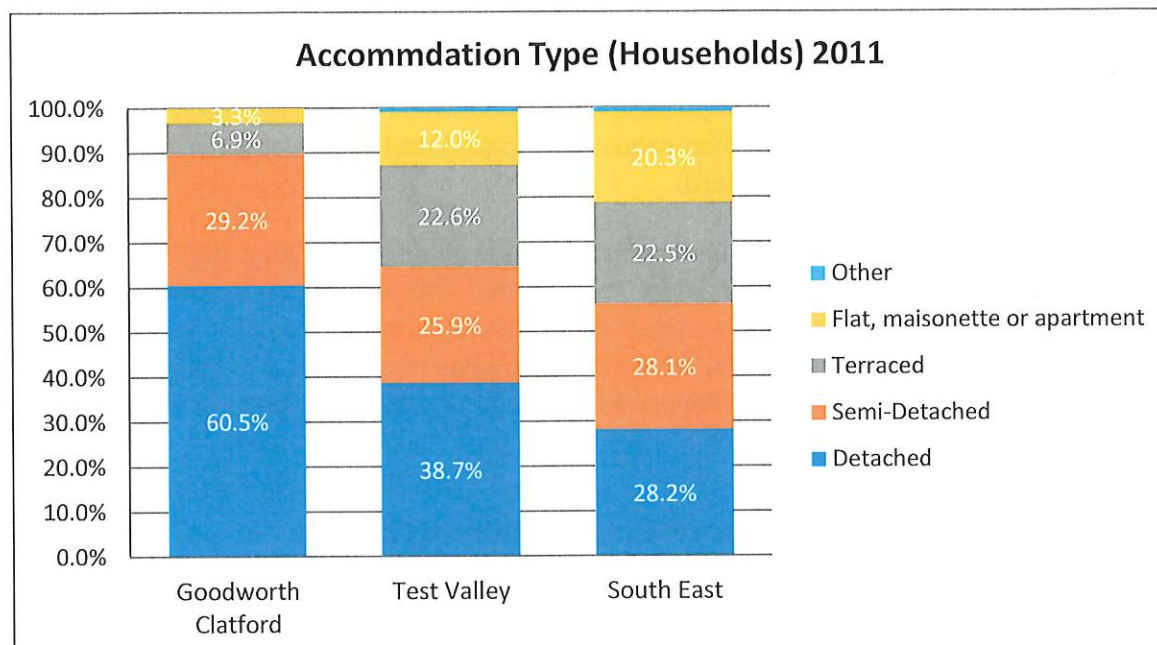


Figure 6 - Household Accommodation Type [Source ONS Census 2011 QS402EW]

The 2011 Census provides most up-to-date evidence on the number of bedrooms per dwelling and household occupancy rates. No comparable data is available from the 2001 Census. The dwelling stock in Goodworth Clatford comprises a high number of households containing 3 or more bedrooms. Figure 7 below shows 252 (75.9%) of the household spaces in 2011 with at least one usual resident contain 3 or more bedrooms. This reflects is higher than the Borough figures, which show 70.4% of households containing 3 or more bedrooms.

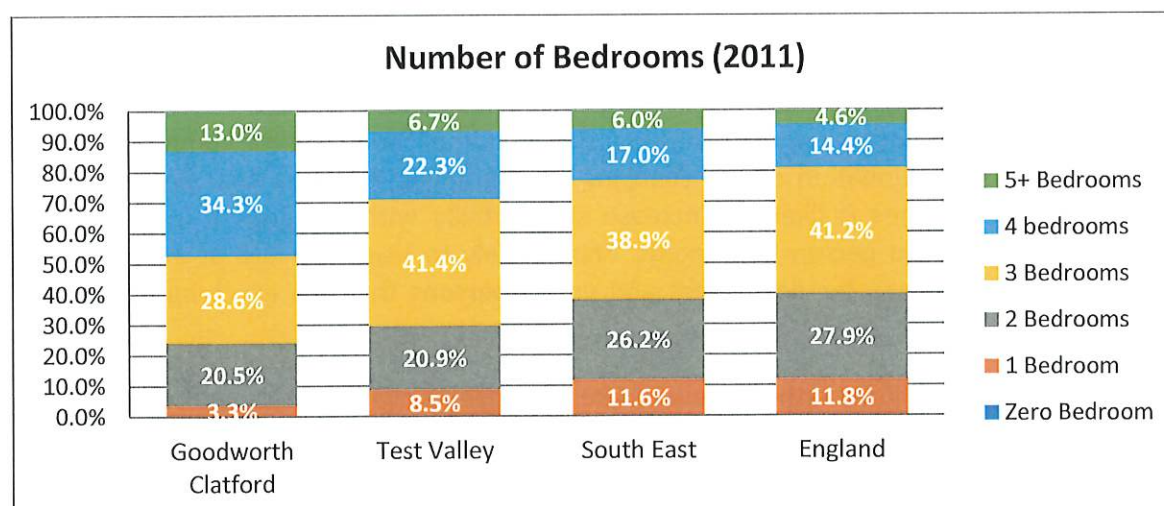


Figure 7 – Breakdown of dwellings by number of bedrooms [Source 2011 Census QS411EW]

is notable that the number of 1 bedroom dwellings comprises 3.3% of the total stock, which is below the Borough average of 8.5%. The quantum of one bedroom homes does not reflect

the number of single person households (over all age groups) which comprises some 24.7% of the total household spaces – furthermore around 42.5% of the older age population reside in one person households (2011 Census – QS111EW).

Of those bedrooms, Figure 8 highlights a very high under-occupancy rating for Goodworth Clatford. It identifies that 93 dwellings (28%) have 1 bedroom more than is required and 204 (61.4%) have 2+ bedrooms more than required, implying that 89.5% of total dwellings are under-occupied in Goodworth Clatford.

The level of under-occupation (2+ bedrooms) is significantly greater than the Borough and South East averages of 45.5% and 37.1% respectively. The level of under-occupation (2+ bedrooms) is significantly higher than the Borough average of 45.5%. Under-occupancy is a very familiar picture in rural villages, where older couples may live in a 3+ bedroom house because they either do not wish to downsize or there is no suitable property available locally to downsize.

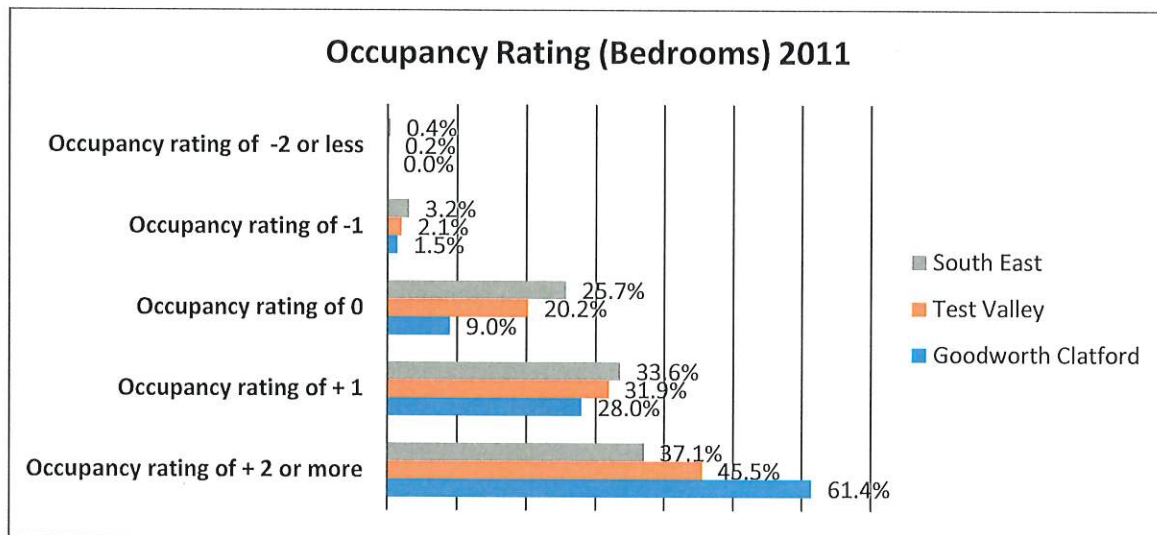


Figure 8 – Occupancy Rating [Source ONS Census 2011 QS412EW]

The proportion and occupancy of the housing stock has implications for the community when considering the continuation of the changing demographic. The very high percentage of under-occupied homes is likely to increase substantially with the growth in the ageing population and single person households. This is likely to lead to a lack of availability of suitable smaller homes for downsizers and young persons that will exacerbate issues of affordability.

Both at national and local authority level there have been a significant fall in the proportion of owner occupiers and corresponding growth of the private rented sector. In England, owner occupation has reduced from 68.7% to 63.3%, while locally in Goodworth Clatford Figure 9 shows this sector has reduced from 80% to 77.4%. The addition of 3 social rent and 2 shared ownership products between 2001 and 2011 has increase 'affordable housing' from 8.9% to 9.9%. Growth in the private rented sector has been the most pronounced since 2001 throughout England, where this sector has grown in Goodworth Clatford from 6.3% to 8.7%.

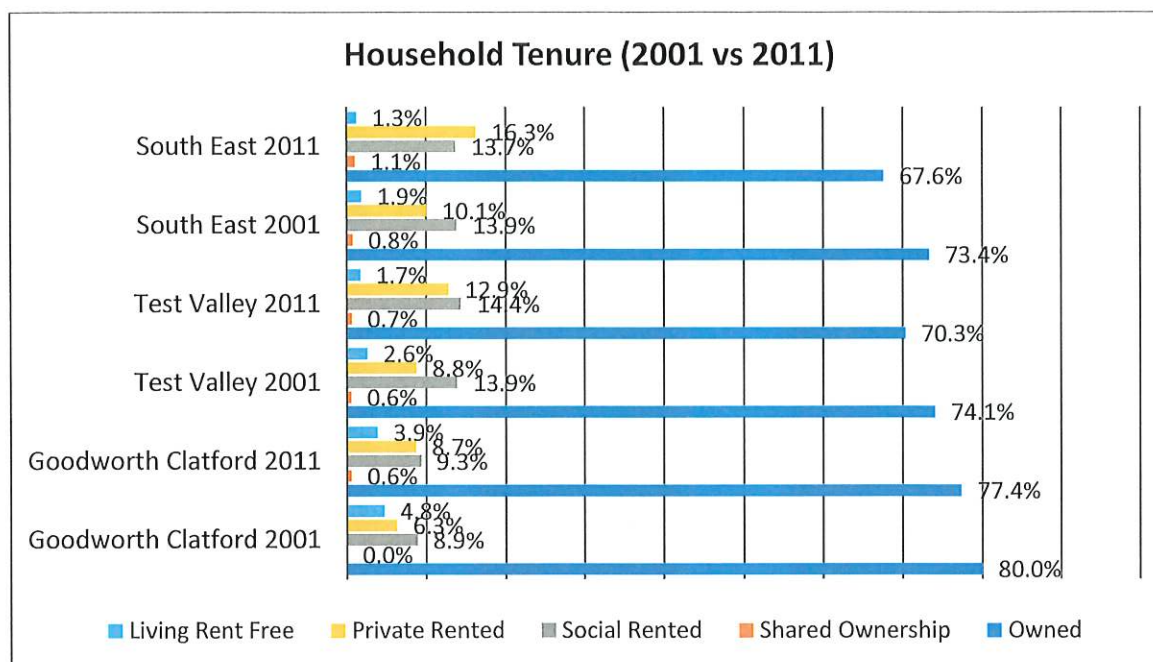


Figure 9 – Goodworth Clatford Tenure Profile [Source 2001 Census UV63 & 2011 Census QS405EW]

The 9.9% of the housing stock that is 'affordable housing' at Goodworth Clatford is less than the Borough and South East averages of 15% and 14.8% respectively, highlighting a potential under-supply.

The main reasons for this change in tenure balance between 2001 and 2011 are that:

- There has been a dramatic fall in first time buyers because of affordability, lending criteria especially the need for a 20% deposit or more and the general difficulty in obtaining a mortgage over since 2008;
- This has created a large increase in young households in the private rented sector because they cannot buy, along with the growth through buy to let as an investment particularly in the earlier part of the decade.

In terms of valuation of residential properties, Figure 10 below shows that 6.2% of Goodworth Clatford properties are at the lower end of the property market (Bands A and B). This compares to 22.2% for Test Valley as a whole. 43.3% of the parish's properties are in the middle range of the property market (Bands C to E). This compares to 60.8% across the whole borough. 50.4% of Goodworth Clatford's properties are at the higher end of the property market (Bands F to H). This compares to 17.1% of all Test Valley properties.

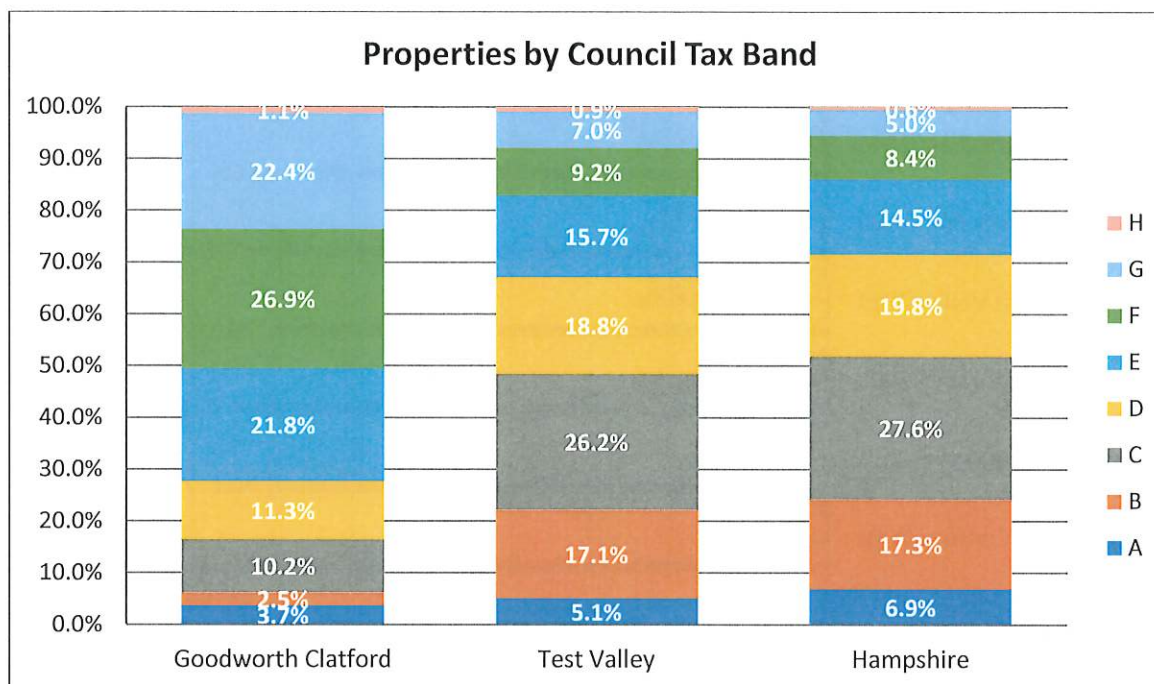


Figure 10 – Properties by Council Tax Band [Source Test Valley Profile 2016]

According to Zoopla [accessed 5th December 2016] the average price paid within the last 12-months for a house in Goodworth Clatford is £694,100 from 5 sales⁶, increasing by 3.63% in 12-months. This figure is significantly higher than the Hampshire average of £328,982. The mean average gross income for people ages 22-29 years in the UK is £21,884⁷. An 80% mortgage for a property priced at £653,000 is around 24 times the income of someone earning the average wage in this age group. The turnover of sales in Goodworth Clatford during the past 12-months is an estimated 2.5% of the dwelling stock of 355.

It is estimated⁸ that 38.2% of households in north rural Test Valley cannot afford to buy a private property. The north rural area includes the wards of Anna, Amport, Bourne Valley, Harewood, Over Wallop and Penton Bellinger.

In terms of housing need, there is a steadily high level of demand for affordable housing in Goodworth Clatford whereby the most recent data as of 1st December 2016 identified a need from 13 households with a local connection on the Hampshire Choice Housing Register for rental homes. The Housing Register – Table 2 - currently identifies 10 households requiring a one bedroom home and three requiring a two bedroom. Those needs arise from a range of ages of the Eldest Joint Applicant – Table 3. The bedroom need is always fluctuating as previous enquiries of the Register revealed a need for three and four bedroom properties.

⁶ <http://www.zoopla.co.uk/market/goodworth-clatford/?q=Goodworth%20Clatford%2C%20Hampshire>

⁷ ONS Annual Survey of Hours and Earnings, 2016 Provisional Results

<http://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/agegroupshettable6> - Dataset ID: ASHE: Table 6

⁸ Goodworth Clatford Parish Profile 2016

Housing need is prioritised according to the personal needs of the applicants with four priority bands 1-4. Band 1 is where there is a critical need to move and the current housing situation is seriously detrimental to health or welfare and interferes with quality of life to an intolerable degree. Band 4 is where there is a slight medical or welfare need to move. The current housing situation is detrimental to health and interferes with the quality of life to a low degree.

Table 3 – Hampshire Home Choice Applicants for Affordable Rental by Assessed Bedroom Need and Band [1st December 2016]

Priority Level	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Band 1 (Urgent)	0	0	0	0
Band 2 (High)	1	1	0	0
Band 3 (Medium)	5	2	0	0
Band 4 (Low)	4	0	0	0
Total	10	3	0	0

Table 3 – Hampshire Home Choice Applicants by Age of Eldest Joint Applicant Group and Assessed Bedroom Need [1st December 2016]

Age of eldest Joint Applicant Group	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
16-39	4	2	0	0
40-44	0	0	0	0
55+	6	1	0	0
Total	10	3	0	0

As a result of a longstanding need for affordable homes for local people, Test Valley Borough Council officers have been working with the Parish Council, Ward Members and the community since 2011 to agree a way forward to deliver rural affordable homes in the village of Goodworth Clatford. There have been a number of meetings held with the Parish Council and members of the community which have included presentations from Test Valley's housing team and Action Hampshire. These meetings were primarily looking at Exception sites for a scheme comprising 100% affordable homes, through the HARA partnership, under Local Plan Policy COM8 for those with a local connection.

A parish Housing Needs Survey (HNS) was published in April 2013 by Action Hampshire following a consultation in February 2013 to all 351 households in the parish. While the original objective of the HNS was to focus on affordable tenures and the needs of downsizers, the survey did not target only those within those groups and consulted all households. The HNS therefore details the baseline conditions concerning the current housing situation across all tenures within the Study Area. The HNS should therefore be read in conjunction with this Statement as it provides the full assessment of local housing issues. A response rate of 151 (43%) was achieved which is a very representative sample, therefore providing an 'indication' of need as it is not a full census. This report provides a robust basis upon which to objectively understand the impacts of local demographic factors, while assessing the needs for affordable housing in the community, with general commentary on wider housing market issues.

Table 4 - Goodworth Clatford Housing Needs Survey Indicative Home Size Requirements (all tenures) – source Housing Needs Survey April 2013 Fig.6.29

Bedrooms	One bed	Two bed	Three bed	Four bed	No Answer
Percentage Need	12%	41%	12%	12%	23%

The HNS identified an unmet need from 16 households in housing need – Table 4. The HNS analysis was that 7 of those households are eligible for an affordable property in Goodworth Clatford, of which 2 households were on the Housing Register, so the survey identified an additional 5 households in need. Adding these 5 households to those with a local connection to Goodworth Clatford on the Housing Register, the HNS concluded that there is a local housing need of at least 20 households in Goodworth Clatford for affordable housing. Having regard to the latest evidence on the Housing Choice Register the need remains for at least 15 – 20 affordable units in a range of tenures. The HNS also infers an unmet need of at least 9 households for open market housing in the locality (as those respondents are not eligible for affordable housing) and considers the needs for downsizers.

The unmet affordable housing need is a product of:

- High affordability issues in the locality whereby the average price paid for a property in the parish of Goodworth Clatford in the past year is around 25 times the income of someone earning the average wage of someone aged 22-29;
- Undersupply of affordable housing which equates to 9.9% of the local housing, stock which is significantly lower than the South East average of 14.8% and Borough average of 15%;
- A low-turnover of property, whereby 80% of HNS respondents have lived in the parish for greater than 5 years;
- A lack of suitable housing to meet local needs as the proportion of detached houses in the parish is significantly higher than the borough and England averages;
- A lack of smaller properties for people starting a home, or wishing to downsize, whereby the number of 1, 2 or 3 bedroom homes in the housing stock is significantly less than the Borough and England averages – Table 4; and
- A lack of smaller properties suitable for those with disability, health or access issues experienced by at least three households identified in the HNS.

It is important to note that, while the objectively assessed needs within HNS identified a demonstrable affordable need for 20 units, it recommended a small scheme for local people of around 6-8 units. This was because this represented the level of development the majority of the community indicated it would support. This is despite those surveyed⁹ recognising that a range of housing would benefit the community, specifically affordable homes, housing for first-time buyers and housing for older people downsizing.

The HNS also explored the issue of local people who wished to downsize to a smaller property as the demographic evidence highlighted an ageing population. Provision is made within the

⁹ HNS paragraphs 5.5 and 5.6

village for older person homes, including a total of 19 properties at St Peter's Close¹⁰ built in 1998 providing managed accommodation for those over 60 years of age. The HNS identified 14 households who need to downsize in the future and a further 4 who may wish to downsize in the future. Of these 18 households, 3 explained they require specialist or adapted accommodation, care and/ or support.

A particular issue identified within the HNS was the high number of family members having moved out of the parish due to difficulties in finding a suitable home locally¹¹. Goodworth Clatford has a declining working-age population. The HNS identified that this is a direct result of many young people and families having moved out of the parish in recent years in search for suitable and 'affordable' accommodation across all tenures. Furthermore, the latest SAPF highlights the trend of a declining population will continue. These factors have resulted in local people being unable to afford housing in the area in which they live and have grown up, particularly for those on lower incomes or first time buyers, hence the gradual decline in population as younger persons move away.

The HNS does indicate that population with a local connection that have moved away do want to return to the village. There are a range of social benefits in families remaining together, whether to preserve family connections or to assist with care for older generations. The HNS identified¹² 125 people currently living elsewhere that may like to move back into Goodworth Clatford, representing a reduction in population by around 16.1%. These 125 households / individuals were not identified by the HNS to be interested / eligible for affordable housing and as a result this further reinforces the view that there is a lack of suitable and 'affordable' open market homes in Goodworth Clatford.

As previously, according to the Census, the parish witnessed population growth of 20 persons in the period 2001 – 2011. Notably, this growth occurred during a period where the housing stock increased by 20 dwellings – including a development of 7 affordable homes (3 x 2 bed bungalows, 2 x 2 bed houses and 1 x 3 bed house) on land Adjoining 1 Barrow Hill¹³. However, the demographic data indicates that the limited scale of development has continued to reinforce existing suppressed patterns of household formation.

In terms of new development within the parish within the past five years, there has been a net gain of 2 dwellings arising from developments at Lorient¹⁴ and Hithercroft¹⁵. It is also noted that the Council consented to the net loss of a dwelling on Barrow Hill¹⁶, in doing so a pair of semi-detached dwellings each containing two bedrooms will be replaced with a four bedroom dwelling. Recently a consented development at Summerfields on Barrow Hill¹⁷ approved the development of 4 no. 4 bedroom units, similarly a 4 bedroom dwelling was consented at The

¹⁰ <http://www.cognatum.co.uk/home/Properties-For-Sale/property-details.aspx?ID=52>

¹¹ HNS paragraphs 6.3 to 6.8

¹² HNS paragraph 6.8

¹³ Full Planning Permission TVN.08776/LW dated 19.04.2004

¹⁴ Full Planning Permission 11/00224/FULLN

¹⁵ Full Planning Permission 11/01355/FULLN amended by 14/01416/FULLN

¹⁶ Full Planning Permission 15/02624/FULLN granted 28.01.2016

¹⁷ 17/01011/FULLN

Pines on Barrow Hill¹⁸. No affordable housing contribution was required on any of these schemes in line with local and national policies.

It is therefore clear that the market-led range of housing types coming forward in Goodworth Clatford have not provided for local needs. In doing so, no affordable housing has been provided and the range of housetypes are not addressing the various population and housing challenges.

It is highly noteworthy that the Goodworth Clatford Neighbourhood Plan could've addressed these challenges, including allocating land for housing to meet a range of local needs, however it choose not to do so.

In summary, with a low proportion of affordable and suitable housing stock meeting both 'affordable' and 'market' sector demand, high levels of under-occupation, a gradually declining population and an ageing population, there is an apparent pressing need to address this imbalance through a housing allocations at Goodworth Clatford on SHELAA site SHELAA64 for the following reasons:

- A demonstrable unmet housing need within the HNS from local people for at least 20 units of affordable housing and at least 9 open market housing units. The Hampshire Choice Housing Register identifies 13 households in need for rental affordable housing.
- A low turnover of relatively large expensive detached open market housing in the area
- A lack of smaller or suitable properties, particularly for people starting a home. This contributes to the high number of people who leave the area but wish to return and results in a continual decline in the working-age population
- A percentage of new homes should be delivered to 'accessible and adaptable' standards in line with the optional Category 2 in Building Regulations Part M. This will help to ensure that, over time, the mainstream housing stock provides a suitable setting in which older people can continue to live independently and where care can be provided.
- A lack of smaller properties suitable for those with disability, health or access issues

While the above assessment relates solely to Goodworth Clatford, our experiences of working in the Borough, most notably at Over Wallop¹⁹ has demonstrated that these challenges are likely to be shared with other rural communities. Clearly, the precise amount and type of housing required will be specific to each community, however a step change is required in Test Valley to grasp what the Framework is inviting the LPA to do, i.e. you *"should identify opportunities for villages to grow and thrive, especially where this will support local services."* To do so, the LP must be informed by an understanding of local population / housing challenges and local services and what development is actually required to maintain or enhance them. The scale of the housing development actually required to readdress these challenges at villages is of a scale to justify distribution according to needs and for the LP to identify opportunities through allocations. Reliance on the present market-led infill /

¹⁸ 18/00192/FULLN

¹⁹ Land North West of Evans Close, Goodworth Clatford

redevelopments within settlement boundaries is insufficient in isolation to make a real difference to rural communities due to the limited scale of sites meaning no controls exist to ensure the delivery of the right types of housing through windfall development.

Q6: Grouping of settlements

Yes. There are many examples of settlements that function as a group within the Borough, including groupings loosely defined by Wards, while retaining their own distinct identity. While there may be one settlement without facilities, the population at that settlement will have a contributing role in supporting the vitality of facilities and services elsewhere particularly in relation to schools, GPs and local convenience retail provision. The above answer to Q5 recommends these spatial and wider community factors must be taken into account when establishing any settlement hierarchy and distribution of the local housing requirement. In relation to Goodworth Clatford, the village is already part of a distinct grouping of settlements to the south of Andover with Abbots Ann, Little Ann and Upper Clatford where, most notably the Clatford Church of England Primary School in Goodworth Clatford serves the area.

Q7: Proximity of rural settlements to other larger settlements

These relationships to settlements within and adjoining the Borough in terms of services, facilities, employment and public transport must be recognised in defining the distribution of growth and will provide appropriate opportunities to meet the local housing need, relative to isolated locations and settlements.

Q8: Inclusion of new allocations within the settlement boundaries

The purpose of the settlement boundaries should be to define the extent of the physical settlement at the point of the end of the plan-period, not at the start. Consequently, allocations being developed pursuant to the current Local Plan should be included within the boundary. Furthermore, any new allocations or areas for growth should be identified within those boundaries.

Q9: Typology of land within settlement boundaries

All typologies of land that are not settled, or related to existing settled land and the community, or additional land that will become settled in the course of the LP, should be excluded.

It will therefore be important to include:

- Church yards
- Car parks
- Community facilities and services
- Schools (and playing fields)
- Employment sites
- Infrastructure land
- Full curtilage of dwellings
- Public Open Space (including recreation grounds and allotments)
- Farm / equestrian complexes within / adjoining settlements

- Allocations / locations for growth, including areas adjacent or well-related to settlements that offer a suitable location for growth to meet the local housing need and other development needs

Q10: Inclusion of whole curtilages within settlement boundaries

The inclusion of whole curtilages for defining settlement boundaries should be retained.

Q11: Drawing of settlement boundaries

The settlement boundaries cannot be a barrier on development. They are a policy-on designation and ultimately a theoretical tool to determine which policy is triggered as a starting point.

The LP cannot rely solely on settlement boundaries in order to achieve sustainable development. The use of boundaries as a planning tool is supported, however there must be a recognition that the current approach has not actually delivered the right type of housing. This is inextricably linked to the absence of affordable housing being delivered within settlement boundaries in the rural communities as sites are of an insufficient size to trigger the affordable housing contribution as defined by the Framework. A positive approach of the LP is required to allocate land outside boundaries, including at SHELAA site at Barrow Hill, Goodworth Clatford.

The LP must include sufficient flexibility and the definition of boundaries must be informed by the availability of land for development and the actual opportunities for windfall development within those boundaries.

Flexibility is required and the response to Q8 and Q9 highlights the benefit in a looser approach with allocations and potential areas for growth included within boundaries, reflecting the relative role of each settlement to deliver growth.

Q12: Scale of growth within boundaries

The settlement boundaries cannot be a barrier on development. They are a policy-on designation and ultimately a theoretical tool to determine which policy is triggered as a starting point.

The LP must include sufficient flexibility and the definition of boundaries must be informed by the availability of land for development and the actual opportunities for windfall development within those boundaries.

Flexibility is required and the response to Q8 and Q9 highlights the benefit in a looser approach with allocations and potential areas for growth included within boundaries, reflecting the relative role of each settlement to deliver growth.

We look forward to reviewing the next Local Plan as part of future consultations.

We also look forward to working with you on behalf of our client in respect of demonstrating the sustainability benefits of the residential allocation of the land at Barrow Hill, consistent with the Framework's objectives to promote such sites for housing development.