



WYG Ref: HP120007

27<sup>th</sup> August 2020

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

Dear Sir/Madam,

**RE: Consultation response to Test Valley Borough Council's (TVBC's) Refined Issues and Options Consultation June 2020 on behalf of the Trustees of the Captain Busk Grandchildren Settlement**

On behalf of our client, the Trustees of the Captain Busk Grandchildren Settlement, I write in response to the Council's consultation on the Refined Issues and Options Document (June 2020). This follows the Issues and Options consultation in 2018. My client continues to have an interest in the land known as 'Land west of Rose Cottage'. The site was previously submitted as part of and included within the Council's Strategic Housing & Economic Land Availability Assessment (SHELAA) under reference 239. This representation will focus on section 5 of the refined issues and options document (June 2020) titled 'Section 5: Living in Test Valley (Housing and communities)'. More specifically, this representation will demonstrate that the Council should seek the dispersal of housing to smaller settlements towards the heart of Test Valley to meet local need and also respond to aspects within this section that relate to the provision of self-build housing.

We support the acknowledgement in paragraph 5.4 which states that in areas where house prices are high compared to associated incomes, more homes will need to be built. This is particularly relevant to the land west of Rose Cottage, located in the village of Houghton. A review of the Houghton Parish profile notes that approximately only half of the properties fall within the lower end of the property market (Bands A-E) compared to the Test Valley average of 83%. Additionally, only 15% of Houghton properties are at the lower end of the property market (A-B). It also states that almost 40% of households in central rural Test Valley (such as Stockbridge) cannot afford to buy a private property, house prices have also risen by almost 18% in the last 5 years where the average house price is £788,594. It was also noted that by 2021, 43.5% of the parish would be aged 65 and over. These

factors combined highlight the problems smaller villages such as Houghton are facing in providing inclusive communities and ensuring the sustainability and viability of services within it. This runs contrary to the Council's vision noted in paragraph 5.10 where it is stated that there is a need to provide for a supply of homes to meet the community's needs of the Borough.

The refined issues and options document states that the housing requirement is 550 dwellings per annum, but the Council accept that this is expected to change following the Government's update to the standard methodology. The Government have since published the new standard method for calculating housing requirement (August 2020) which will increase the Council's requirement to 813 dwellings per annum. Although this has not yet been formally adopted, this demonstrates the Government's commitment to boosting housing supply. More locally, this will likely result in the need to allocate more sites currently outside of the settlement boundary. The Council should seek to allocate sites that relate well physically and visually and should be seen as the primary options for new housing development. The land West of Rose Cottage would respond positively to both of the above and should be considered an appropriate location for new development.

We are pleased that paragraph 5.13 recognises that the distribution of housing and achieving an appropriate balance of the scale of development between larger settlements and the 'rural area' is a key decision. This is a positive step forward from the previous unbalanced strategy which led to only 9% of housing being delivered in rural areas. This leads into paragraph 5.16 which recognises the need for new housing to be more widely distributed, including the provision of housing sites across rural areas and villages, such as Houghton. Houghton is located within Stockbridge which has been identified as a centre for a number of rural communities and an important destination for services and facilities, this clearly demonstrates that the Council consider it a sustainable location.

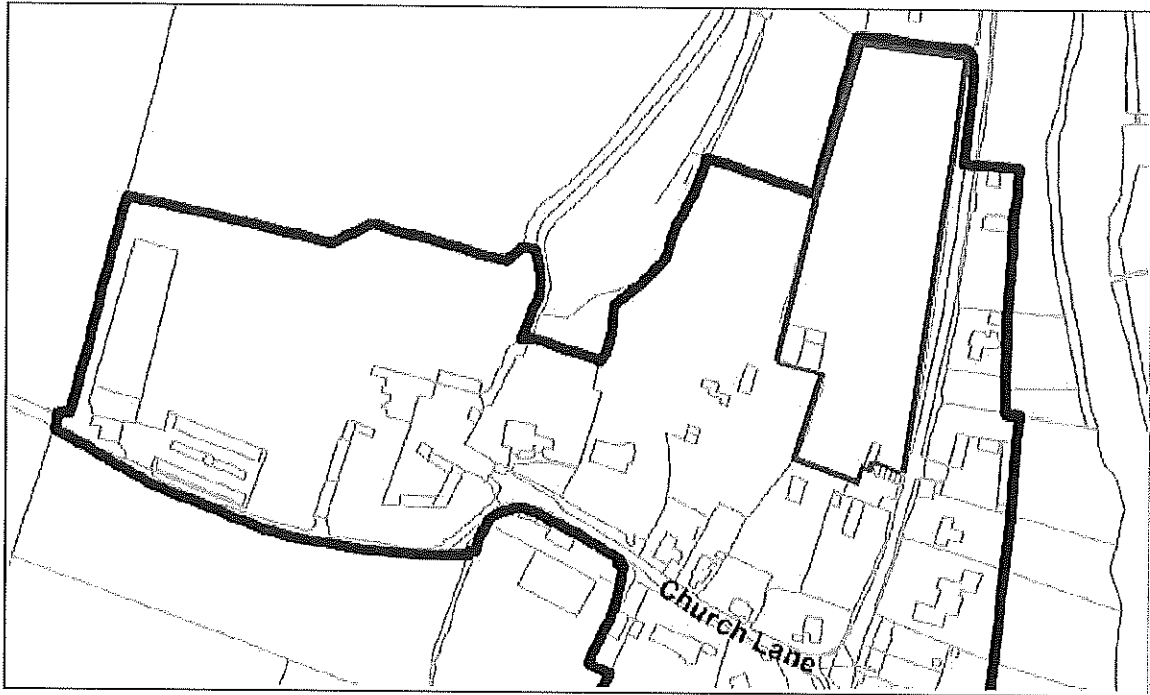
Paragraph 5.19 notes that the current adopted local plan does not make any specific allocations to the rural area. This has had an adverse impact on rural communities in relation to affordability and sense of community as noted above. The Refined Issues and Options document goes on to state that the next Local Plan will consider the future scale of growth for the rural area and the strategy options for housing development which is supported. It is important that rural areas such as Houghton are allowed to grow and are not left behind where the socio-economic issues in relation to housing are exacerbated. This would run contrary to the aims and objectives of section 5 of the Refined Issues and Options document. Paragraph 5.20 states that neighbourhood plans have an important role in making provision of new housing, but it should be highlighted that this approach has not been sufficient in addressing the issue to date, especially in rural areas. Houghton Parish are currently progressing their Neighbourhood Plan, however this is only draft and there is no indication of when it will be adopted.

In response to Question 7, we believe that rural settlements which are close to other larger settlements should be seen in a positive light for the allocation of housing. It is important to encourage development in these locations to support local facilities and services so they remain viable. This would result in the more appropriate dispersal of housing and enable rural villages and settlement to not rely so heavily on market towns which are unaffordable. This can lead to unbalanced communities which can affect services and facilities in addition to housing and employment.

In response to Question 9, we continue to support the decision to review settlement boundaries and express that settlement boundaries should be defined through a contextual analysis and review of existing built development. Settlement boundary revisions should also consider sites that are currently located outside of the settlement boundary but relate well physically to the existing built environment and sites that do not fulfil the role of the countryside. This is the case with the land west of Rose Cottage defined by strong defensible boundaries including built development on all four sides. It hence represents a sensible location for residential development. The strong tree/hedge lined boundary separates the site from the open countryside beyond and this boundary could be enhanced with additional planting. It should also be noted that the current settlement boundary for Houghton includes land to the east of the settlement which is located within the floodplain, therefore, it will not be possible to provide the required development needs at that location as the land within the floodplain is unlikely to meet the sequential test where other, more suitable, sites in the village are available, such as the land west of Rose Cottage. Instead, the land west of Rose Cottage is relatively free of constraints and available for development.

It is important to highlight that during the Local Plan review Process (Regulation 18 preferred approach) the land west of Rose Cottage was included within the settlement boundary (insert 1 below). This demonstrates that the Council clearly found the development of this site acceptable in principle. However, at the pre-submission stage it was omitted. There was no sound planning reason for this change. There was no change in the character of the village between the site being initially identified as suitable and then excluded. As noted above, the site relates well physically and visually in relation to the built form of the village rather than fulfilling the role of open countryside and we request that the settlement boundary of Houghton is re-addressed within the context of the above.

**Insert 1: Houghton Settlement boundary as per the Local Plan Review, Reg 18 (February 2013)**



Self-build housing

We support the Council's recognition that self-build schemes are often driven by the ambition to build to a high environmental standard which surpass current standards. This is a positive response from the Council and the provision of the land west of Rose Cottage would present an appropriate location to facilitate such development.

We agree with the method of identifying the demand for self-build housing as highlighted in paragraph 5.36. This states that Local Authorities are responsible for maintaining a self-build register to determine the number of people interested in building their own home. This also correlates with paragraph 10.23 of the Council's AMR (2019). The Refined Issues and Options document highlights that there are a number of options which could be considered to accommodate the demand for self-build. These options are reflected within the Questions contained within Section 5 of the document and will be discussed below.

We support the Council's decision to review all available options surrounding that help deliver self-build housing within the Borough, especially within rural areas such as Houghton. We would like to highlight that the suggested fee to join the self-build register should not deter applications coming forward, this would run contrary to the Government's commitment to boosting housing supply and the Council's aims to allocate more housing in rural areas.

In response to question 13, the introduction of a specific policy for self-build homes could potentially result in the increased provision of self-build allocations through the Council giving it due consideration which would be positive. We support the principle of the specific self-build policy, however little detail has been provided at this point. In response to question 16, it is agreed that the introduction of a self-build policy could help tackle the issue of climate change, this is because these homes are often delivered to a higher environmental standard. We support the Council's commitment to address Climate Change, however, we are concerned that placing additional requirements over and above those for other housing may be outside of the remit of a self-build housing policy. The inclusion of additional requirements has the potential to add additional delay, undermining the purpose of section 5 of the Refined Issues and Options document and the Government's indication that the Borough will need to deliver 833 dwellings per annum.

#### Land west of Rose Cottage

The land west of Rose Cottage is suitable and achievable for self-build housing and would respond positively to the aims and objectives of section 5 of the Refined Issues and Options document. The land was previously promoted within the SHELAA, reference 239. This site relates well physically to the existing built environment and would form a natural form of development and respond positively to the built form of the settlement. The site is surrounded by residential development, is visually well contained by mature planting to its boundaries and is generally flat and does not fulfil the role of the countryside. As set out above, the site was previously included within the draft settlement boundary for Houghton as part of the Local Plan Review Regulation 18 Preferred Approach In 2013 (insert 1) and was therefore clearly considered by the Council to be an appropriate location for self-build development. The provision of the land west of Rose Cottage for self-build housing would help meet the identified demand, there are currently 154 individuals and 1 group on the register. This site would also respond positively to the Council's acknowledgement that self-build plots within semi-rural or rural areas are being sought (AMR, 2019). Therefore, the land west of Rose Cottage presents an appropriate site for self-build housing of around 12 homes. This would represent modest sustainable growth to the village to help alleviate the demographic and affordability issues identified within the rural areas.

## Conclusion

In summary, we strongly support the decision to better distribute development throughout the borough, especially within rural areas where the socio-economic issues in relation to affordability and sustainability are most relevant and at most risk going forward. We also strongly support the Council's decision to explore options that help deliver self-build housing, especially in rural areas such as Houghton. Settlements such as Stockbridge and the villages contained within such as Houghton are vital locations, located in close proximity to the key service centre and the provision of housing would help sustain the remaining services and facilities and support new ones. The Council's current strategy limits the choice of location for home buyers, concentrating development in one place which severely limits the growth of rural settlements which runs contrary to the NPPF which notes that LPAs should deliver a wide choice of quality new homes. The Government's recent commitment to boosting housing supply will result in the Council being required to deliver in the order of 813 homes per annum, a 263 increase. As confirmed by the Council, there are currently 153 individuals and 1 group on the TVBC self-build register. This demonstrates the clear need for the provision of self-build housing within the borough. These factors combined will only put further pressure on the Council to allocate sites in 'rural areas'. Overall, we welcome and support the Council's decision to deliver homes that meet community needs, specifically in rural areas.

We would like to highlight the requirements set out in paragraph 35 of the NPPF which details what requirements need to be met for the local plan to be found 'sound'. The tests for soundness set out in the NPPF are:

- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs<sup>19</sup>; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent** with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.

It is considered that the Plan in its current form would fail to meet the above tests. This representation has highlighted areas of support for the Refined Issues and Options and also noted aspects that need further review and change. For the reasons set out in this letter, it is vital that the Council adopt a better approach and strategy to ensuring the dispersal of housing, especially to rural areas and also promote self-build housing.

