

Test Valley Local Plan
Refined Issues and Options

GLADMAN

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1 INTRODUCTION

1.1 Introduction

- 1.1.1 These representations are submitted by Gladman in response to the current consultation on the Test Valley Local Plan Refined Issues and Options. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.
- 1.1.2 Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure that residents have access to a decent home and employment opportunities.
- 1.1.3 Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in this representation.
- 1.1.4 During the course of this consultation the Government published the Planning for the Future White Paper setting out proposals for how it wants to 'radically reform' the planning system. Central to the proposals will be a simpler, more streamlined Local Plan making process. Consultation on the proposals is currently ongoing and subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.
- 1.1.5 The Refined Issues and Options consultation represents the early stages of the plan preparation process and Gladman welcome the opportunity to share our views on a future Local Plan for the borough. As the White Paper is only currently under consultation and there is currently uncertainty around timescales for moving towards a new Local Plan making process, this representation has been prepared against the backdrop of the current system.
- 1.1.6 Through this submission, Gladman have therefore sought to provide our thoughts on a number of the key themes and issues that are covered in the current consultation document, and have also provided site submissions for land being promoted for residential development. In progressing a Local Plan under the current system, the Council will need to carefully consider some of its policy choices and ensure that its evidence base is up-to-date and robust in light of changing circumstances and the changes brought about by the revised National Planning Policy Framework (2019).

2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework

- 2.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.
- 2.1.2 The Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirms the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. Paragraph 16 of the Framework (2019) states that Plans should:
- a) *Be prepared with the objective of contributing to the achievement of sustainable development;*
 - b) *Be prepared positively, in a way that is aspirational but deliverable;*
 - c) *Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
 - d) *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
 - e) *Be accessible through the use of digital tools to assist public involvement and policy presentation; and*
 - f) *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*
- 2.1.3 To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay¹.
- 2.1.4 To be considered sound at Examination the emerging Local Plan will need to meet all four of the soundness tests set out in paragraph 35 of the Framework (2019).

¹ NPPF – Paragraph 60

2.2 Planning Practice Guidance

- 2.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans.

2.3 Planning for the Future White Paper

- 2.3.1 On the 6th August, Government published the Planning for the Future White Paper setting out proposals for how it is seeking to 'radically reform' the planning system. The proposals are seeking to streamline and modernise the planning process.
- 2.3.2 Consultation is currently underway on these proposals and it will be important that the Council keeps up to date with the implementation of these changes and the implications this will in turn have on the preparation of the Local Plan. Timescales remain uncertain however subject to the outcomes of this process the Government has signalled its intent to make rapid progress toward this new planning system through the swift introduction of new legislation to implement the changes.
- 2.3.3 More importantly alongside this consultation, a consultation is also running on immediate changes to the current planning system. Of significant note is a proposed revised standard method for calculating local housing need, which when implemented will be used as the basis for plans created prior to any changes outlined in the White Paper. Introduction of the revised methodology, which proposes to incorporate a percentage of existing stock as the baseline of the calculation, is likely to see an increase in the housing requirement for Test Valley. The Council should be mindful of these changes and the potential impact on the Local Plan as it progresses.

3 LEGAL REQUIREMENTS

3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.²
- 3.1.2 The Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process³. The SOCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 3.1.3 As demonstrated through the outcome of the Coventry, Mid Sussex, Castle Point and St Albans examinations, if a Council fails to satisfactorily discharge its DtC a Planning Inspector must recommend non-adoption of the Plan. This cannot be rectified through modifications.

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).
- 3.2.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the emerging Local Plan proposals on sustainable development when judged against all reasonable alternatives.
- 3.2.3 The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of

² PPG Reference ID: 61-021-20180913

³ PPG Reference ID: 61-001-20180913

detail for both chosen and rejected alternatives. The Council’s decision-making and scoring should be robust, justified and transparent.

4 KEY TOPICS

4.1 Introduction

4.1.1 The following section of the representations responds to the Key Topics that have been highlighted in the Council’s current Refined Issues and Options consultation document.

4.2 Plan Period

4.2.1 Gladman note that it is intended that the plan period will be established in the preferred option consultation. We would suggest at least a 15-year plan period is pursued to account for any slippage in the preparation of the new Local Plan.

4.3 Housing Requirement

4.3.1 Gladman note that the housing requirement will be established in the preferred option consultation. As has been set out earlier, alongside the current consultation on the proposed changes contained in the Planning for the Future White Paper, the Government is also consulting on proposed changes to the current standard methodology.

4.3.2 It is likely that the proposed revised method of calculating the housing requirement of the Local Plan will be implemented ahead of the publication of the preferred option consultation. Gladman therefore reserve the right to comment on the housing requirement until there is more certainty regarding these changes. The Council should be mindful of these proposed changes and implications of such when deriving the housing requirement for the Local Plan.

4.4 Housing Distribution and Housing Market Areas

Housing Market Areas

4.4.1 When examining the use of housing market areas (HMA) in plan preparation, it is important to consider the changed guidance with regard to the assessment of housing needs. The 2012 NPPF introduced HMAs as a means for considering wider cross boundary housing needs as part of the objective assessment of housing need. In the case of Test Valley, it was considered that the Borough fell into two housing market areas with the southern boundary being largely defined by the extent of the Partnership for Urban South Hampshire (now the Partnership for South Hampshire). The 2012 NPPF was clear that the needs of HMAs must be met in full and as such required Council’s in the same HMA to work together.

4.4.2 The 2019 NPPF no longer relies on HMAs for the assessment of housing needs. Unmet need for housing similarly is not based solely on HMAs with Councils being asked to consider this on the basis of neighbouring areas. In brief the Council can meet its own minimum housing needs anywhere in the Borough as long as that approach is considered to be sustainable, with no requirement to base the delivery of its own needs on HMAs.

- 4.4.3 The main function of HMAs in the 2019 NPPF is with regard to cross boundary co-operation on strategic matters and the preparation of statements of common ground as set out in paragraph 61-017 and 61-018 of PPG. The HMA is used to ensure that the key issue of housing needs and distribution across boundaries are addressed and met effectively. As such an HMA could indicate that any unmet needs that may arise in neighbouring authority areas, such as Southampton, should be met as close as possible to where those needs arise and in line with commuting and migration patterns. But as outlined earlier, it does not need to define how the needs of Test Valley are met.
- 4.4.4 We would, therefore, recommend that the Council does not look to distribute housing on the basis of HMAs but on the basis of the principle of delivering sustainable patterns of development. This would consider evidence on commuting patterns and migration used to identify HMAs, but ensures the distribution of development and the spatial strategy is not constrained by using HMAs.

Housing Distribution

- 4.4.5 It essential that the new Local Plan directs meaningful growth to all settlements across the borough. In this respect, Gladman would be supportive of a strategy that focuses further development towards the borough's main towns and service centres, including Romsey, Andover and Valley Park, whilst still allowing growth to come forward in lower order settlements including West Wellow and Kings Somborne. The villages across Test Valley offer a range of sustainable development opportunities alongside the borough's main settlements, and growth in these types of locations is needed in order to maintain their vitality and viability.
- 4.4.6 It is important to consider existing services and facilities in a settlement when assessing their suitability for accommodating new growth. Daily needs are particularly important with a primary school, shop and access to public transport being the key considerations. It must be recognised that there may be an ability, through new development, to improve some of these services and facilities, particularly access to public transport, that should be considered through any settlement hierarchy exercise as well as the role that new development can play in ensuring these facilities are maintained and not lost because of lack of support.
- 4.4.7 Whilst it is recognised that some of the villages across the plan area are small scale and consideration of setting and character of the settlement is important, these issues must be balanced against the needs of the local community for new housing, including affordable housing and the need to ensure the long term viability of services and facilities in the village. It should also be recognised that increasing the number of sites across the plan area with allocations for residential development will increase the rate of housing completions.
- 4.4.8 Alongside a strategy that seeks to deliver development in the borough's main settlements, the inclusion of an element of dispersed growth to the villages will provide a suite of sites that are capable of delivering in the short to medium term, and which would complement other elements of an overall growth strategy.
- 4.4.9 With regards to the above comments, Gladman refer to paragraph 78 of the NPPF which states:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”

- 4.4.10 In allocating sites, the Council should be mindful that to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets. Whilst some SUEs may have multiple outlets, in general increasing the number of sales outlets available means increasing the number of housing sites. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. In summary a wider variety of sites in the widest possible range of locations ensures all types of house builder have access to suitable land which in turn increases housing delivery.

4.5 Settlement Hierarchy and Settlement Boundaries

Settlement Hierarchy

- 4.5.1 We recognise that the settlement hierarchy can be a useful tool in considering the settlements that are more sustainable options for development on the basis of existing services. However, what such hierarchies often fail to consider is whether development could either increase services in a settlement or secure existing services to maintain the sustainability of a settlement in the long term. We would suggest that as part of any consideration within the settlement hierarchy is a recognition of those smaller settlements where development could offer opportunities for improving or maintaining services such as shops, schools, and public transport links.

Settlement Boundaries

- 4.5.2 Gladman recommend that the new Local Plan should take a flexible approach to growth within and on the edge of the borough’s towns and villages. The Local Plan should avoid blanket protection policies as they may act to unnecessarily stifle sustainable growth opportunities on the edge of settlements. This is at odds with national policy, seeking to boost significantly the supply of housing and applying a presumption in favour of sustainable development.
- 4.5.3 Gladman recommend that the Council could incorporate a criteria based policy. Such an approach would allow the plan to protect itself against unsustainable development at the same time as being open and flexible to additional development opportunities to come forward to meet identified needs.
- 4.5.4 Such a policy mechanism should be flexible enough to be able to accommodate new development outside of existing development boundaries, to allow the Council to quickly address any issues in shortfall in housing supply against the plan requirement.

- 4.5.5 Gladman recommend that the Council could incorporate a criteria-based policy to achieve this, and refer to the submission version of the Harborough Local Plan, Policy GD2, which states: -

“In addition to sites allocated by this Local Plan and neighbourhood plans, development within or contiguous with the existing or committed built up area of Market Harborough, Key Centres, the Leicestershire Principal Urban Area (PUA), Rural Centres and Selected Rural Villages will be permitted where...”

A series of criteria then follows.

- 4.5.6 Clearly the policies here would need to reflect the local circumstances of Test Valley, but it does provide an example of local authorities taking a proactive approach to guiding development and ensuring that they can meet their housing targets and can plan for approaches if and when problems arise over the course of a plan with the delivery of allocated sites.

4.6 Housing Mix and Affordable Housing

Housing Mix

- 4.6.1 In terms of housing mix, Gladman would recommend that the Local Plan avoids a prescriptive housing mix requirement, rather that the policy should allow for schemes to determine the most appropriate housing mix for the particular location. The Plan could include an indicative mix which may be encouraged if appropriate rather than a strict requirement. The housing provided will need to reflect the needs across the area and any policy will need to be flexible and recognise that the specific housing needs may change over the course of the plan period.

Affordable Housing

- 4.6.2 The provision of affordable housing should be a key priority for the new Local Plan. Affordability of housing across the Test Valley area is a significant issue, with the Median Affordability ratio being 9.95
- 4.6.3 It will be important that the affordable housing requirement set through the new Local Plan is tested through the Local Plan Viability Assessment and that it is set at a deliverable level, whilst also ensuring that the housing needs are met.
- 4.6.4 It may be necessary for the Local Plan to include varied affordable housing requirements based on site type and location. This will need to be considered further through the preparation of the Plan.

Optional Standards

- 4.6.5 With regards to optional technical standards for accessible and adaptable homes, if the Council wish to include a policy in the Local Plan adopting these optional standards, M4(2) and M4(3), then this should only be done in accordance with the NPPF (2019) specifically paragraph 127.f, footnote 46 and the guidance contained in the PPG.

- 4.6.6 Footnote 46 states *“planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing where this would address an identified need for such properties.”* Any such policies would need to be based on relevant and up to date evidence to justify specific policy requirements.
- 4.6.7 Gladman refer to the PPG which sets out the evidence necessary to justify a policy requirement for M4(2) and M4(3). Specifically, paragraph ID 56-007 which states: *“There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:*
- *The likely future need for housing for older and disabled people (including wheelchair user dwellings).*
 - *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes or care homes).*
 - *The accessibility and adaptability of existing housing stock.*
 - *How needs vary across different housing tenures.*
 - *The overall impact on viability.”*
- 4.6.8 Gladman also note that it may be the case that any policy relating to optional standards may need to vary in different locations across the plan area, as the justification for requirements may differ. It may not be justified or appropriate, based on the up to date evidence, to set a blanket approach across the plan area.
- Nationally Described Space Standards (NDSS)*
- 4.6.9 The Council will need clear and robust evidence to justify the inclusion of any policy requirement for the NDSS and will need to undertake viability testing in relation to any specific requirements which they wish to impose.
- 4.6.10 The Written Ministerial Statement (WMS) dated 25th March 2015 confirms that *“the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”.*
- 4.6.11 Furthermore, with reference to the nationally described space standard the PPG (ID: 56-020-20150327) confirms *“where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies”.* If the Council wishes to adopt this standard it should be justified by meeting the criteria set out in the PPG including need, viability and impact on affordability.
- 4.6.12 The identification of a need for the NDSS must be more than simply stating that in some cases the standard has not been met, it should identify the harm caused or that may be caused in the future.

4.7 Self-Build and Custom Build Housing

- 4.7.1 Gladman would welcome the addition of a policy in relation to self-build housing within the Test Valley Local Plan. This would be in line with current government thinking and objectives. It is key that the development industry is able to understand the implications of any such policy requirement, to assist with the design of schemes and the consideration of financial viability.
- 4.7.2 Gladman recommend that any policy requirement in relation to self-build housing has an element of flexibility built in to allow for negotiation over self-build plots on the basis of identified demand and also viability to ensure that site delivery is not delayed or prevented from coming forward. Any specific requirement to include self-build plots should be tested through the Council's viability assessment of the Local Plan policies to ensure that the cumulative impacts of all proposed local standards and policy requirements do not put the implementation of the Plan as a whole at risk.
- 4.7.3 Further to this, Gladman urge the Council to ensure the policy has added flexibility as there is no guarantee that these units will be delivered and there may be situations when they are difficult to deliver which may result in the non-delivery of otherwise sustainable land for housing. Therefore, Gladman recommend that any policy specific requirement needs to include a mechanism whereby if the self-build plots are not taken up within a given time period then these revert back to market housing to be provided as part of the wider scheme. This would provide flexibility and help to ensure that the required housing is delivered.

5 SITE SUBMISSIONS

5.1 Introduction

5.1.1 As the Council are aware, Gladman are currently promoting a number of sites for residential development across the Test Valley borough area. Each site is situated in a sustainable location and offers the potential to achieve a high-quality residential development to meet the authority's housing needs.

5.1.2 Further details of our site interests are provided in the Vision Portfolio appended to this representation. In no particular order of importance or suitability for development, the sites comprise:

- Land at Flexford Road, Valley Park
- Land at Halterworth Lane, Romsey
- Land off Romsey Road, West Wellow
- Land off Eldon Road, Kings Somborne

5.1.3 Gladman would be happy to discuss the contents of the Vision Portfolio with the authority's officers, and how the sites we are promoting could help the Council in the delivery of the housing requirement and a balanced spatial strategy for the borough. We look forward to engaging with the Council further as work on the authority's new Local Plan progresses.

6 CONCLUSION

6.1 Soundness Tests

6.1.1 Gladman welcome the opportunity to comment on the Test Valley Local Plan Refined Issues and Options document and hope that these representations are found to be constructive.

6.1.2 For the Test Valley Local Plan to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. These tests are outlined as follows:

- **Positively prepared** – provide a strategy which, as a minimum seeks to meet the area’s objectively assessed needs 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;
- **Justified** – an appropriate strategy, taking account of the reasonable alternatives based on proportionate evidence;
- **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
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

6.1.3 Gladman have provided comments on a number of the themes covered in the Local Plan Refined Issues and Options document and believe that these need considering and addressing in order to aid successful and efficient plan preparation.

6.2 Key Conclusions

6.2.1 In determining the housing requirement for the Local Plan, the Council should monitor the outcomes of the current consultation on the changes to the current planning system and the implications of the proposed revised standard methodology for Test Valley when implemented.

6.2.2 In terms of distributing the growth across the plan area, Gladman believe it is important that the Council progress a balanced approach. In this respect, Gladman would be supportive of a strategy that focuses further development towards the borough’s main towns and service centres, including Romsey, Andover and Valley Park, whilst still allowing growth to come forward in lower order settlements including West Wellow and Kings Somborne.

6.2.3 There are many sustainable settlements across the plan area, and these should be accommodating growth. It will also be important for the Council to consider the location of growth in combination with existing and planned growth. A balanced strategy should help to ensure delivery over the course of the plan period and also that the various needs across the whole plan area can be met.