



Planning Policy and Economic Development Service
 Test Valley Borough Council
 Beech Hurst
 Weyhill Road
 Andover
 SP10 3AJ

Date: 26 August 2020
 Our Ref: LS M20/0606-02

Dear Sir/Madam

RE: TEST VALLEY ISSUES AND OPTIONS

Tetlow King Planning represents **Aster Group**, a leading Housing Association in England. Our clients' principal concern is to optimise the provision of affordable housing through the preparation of consistent policies that help deliver the wider economic and social outcomes needed across the South East region.

Aster is a key partner in the delivery of new affordable homes in Test Valley and is one of the Council's preferred partner Registered Providers. Aster manage numerous affordable rent and shared ownership properties in the Borough, including recent developments in Andover and Romsey.

As significant developers and investors in local people, Aster is well placed to contribute to local plan objectives and act as long-term partners in the community. We therefore welcome the production of the Issues and Options document and the opportunity to provide comments.

Evidence base

We are pleased to note that the Council is commissioning a new Strategic Housing Market Assessment (SHMA) to form part of the evidence base for the new local plan. The existing Test Valley SHMA (2014) is approaching six years old and is now out-of-date in terms of the NPPF. The revised NPPF (2019) introduced significant changes in how the Council will look to assess the need for affordable housing, including the size, type and mix of affordable housing to meet local needs within different areas of the Borough.

We would like to make some generic comments on the newly proposed SHMA that will be used to inform the Borough's future housing targets. The SHMA should:

- Thoroughly and objectively assess the need of *all* types of affordable housing, referring to NPPF Annex 2 for the national definition;
- make it clear that private rented housing does not constitute a valid substitute for affordable housing and should not be allowed for in any affordable housing figure;
- Include the objectively assessed need for the housing requirements of older people;
- Fully account for market signals. With the Planning for the Future proposals and the effects of COVID-19 on the housing market, any SHMA should fully consider the effect these may have on the market, especially if population and migration figures are being based on trends set in an economic recession;
- Ensure any housing figure is based on aspirational economic projection.

Housing Supply in Test Valley

The recently published white paper Planning for the Future consultation (PFF) proposes that Government would dictate the number of houses that are to be built in any particular District, determined by a new standard method of calculation, with an overall target of 300,000 nationally per year. The PFF proposes to focus more on housing delivery and the housing delivery test is proposed to be retained as is the presumption in favour of sustainable development. Taking this into account, Test Valley should be looking to take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, as required by paragraph 119 of the NPPF.

Space Standards

We note that the Council is considering imposing a policies on internal space standards and accessibility standards for new housing.

A blanket application of the Nationally Described Space Standard (NDSS) across all residential development, including affordable tenures, could undermine the viability of many development schemes. This will potentially result in fewer affordable homes being delivered as optional technical standards have implications for build costs and sales values, with implications in turn for development viability. It is possible that many eligible households in Test Valley may not desire, or require housing that meets the NDSS, as it may result in for example, higher rental and heating costs. We therefore recommend that meeting the NDSS is not made mandatory unless it can be demonstrated that there is a clear need for such a standard in residential properties in Test Valley.

We understand the need to require a proportion of dwellings to meet the category standard, as set out in Building Regulations Part M, in order to provide for those in need. If the Council looks to apply such standards, such policy should look to give a percentage of accessible dwellings required on site and the standard by which they are expected to be achieved. We often see that these details are left to be agreed at pre-application stage, however, approaching accessibility in this manner creates a high level of uncertainty for developers. We would like to make the Council aware that there is a significant difference between what is expected for M4(2) and M4(3) accessible dwellings, most notably that M4(3) compliant dwellings require a greater footprint than M4(2) dwellings and are therefore significantly more costly for developers to provide.

The application of both NDSS and accessibility standards should be demonstrated to be viable across various development scenarios through robust viability testing before required through policy.

Question 4 - Should the number steps of the settlement hierarchy be increased, for example by sub-dividing the 'rural villages' into two separate tiers?

It would be appropriate for the Council to sub-divide the rural villages into an increased number of tiers to enable future development in the more sustainable of the rural villages.

Question 8 - In updating the settlement boundaries to reflect recent development which has built and development with planning permission, should we also include new allocations?

Yes, the Council should look to include new allocations when adjusting the settlement boundaries in order to demonstrate a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs. Paragraph 23 of the NPPF states that "Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area."

Question 12 - Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment?

In a pro-growth era of planning, settlement boundaries should not heavily restrict development and should provide opportunities for further sustainable growth, particularly for settlements which are identified as key settlements for future growth. Similar to the response to question 8, a pro-active

