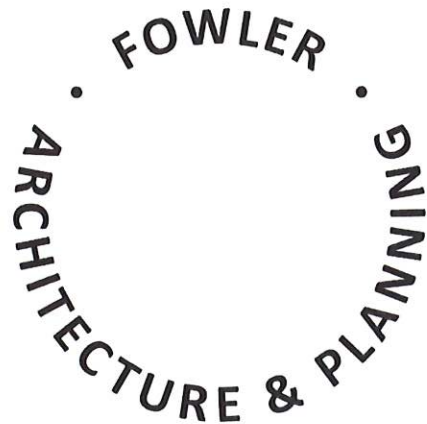


28 August 2020

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

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 Hamdown House, East Wellow**' and '**Land at Fielders Way, East Wellow**'. The availability of this land for development is made separately in submissions to the Test Valley Strategic Housing and Economic Land Availability Assessment (SHELAA).

Mr J Goodbody 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.

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 2015/16¹.

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 35 households in Wellow. 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 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 East Wellow, that will facilitate

¹ Source – Test Valley Borough Council Housing Strategy Evidence Base & Review of Homelessness December 2019

affordable housing delivery as part of mixed tenure schemes that will also meet open market and self-build needs.

Paragraph 5.31 references your evidence base will also assess the need for housing to meet the particular needs of different specific household groups, as set out in national guidance. This will also cover housing to meet the needs of older people and for specialist housing. There is a continuing and growing need to provide specialist accommodation for older people. The needs are demonstrable at Borough-wide and within Hampshire, and ward levels, including unmet needs. The planning system should be responsive to ensure a continuous supply of land for this purpose to enable the care needs of the older population to be met as close as possible to their existing communities and family networks.

The Local Plan should therefore specifically address the urgent needs to widen the choice of specialist accommodation under Use Classes C2 or C3 to meet the evidenced needs through allocations or permissive policies to facilitate developments for these uses. There are three potential types of models appropriate to deliver the specialist accommodation:

- Extra care – a standalone development of elderly housing with on-site care not operated in conjunction with a care home;
- Close care – elderly persons' accommodation linked to a registered care home;
- Care village/CCRC (continuing care retirement community) – large schemes offering an extended range of services for older people; often providing a range of accommodation types and with many including a registered care home on the site (although this is not compulsory).

The Council through the emerging LP and its partners, including landowners and developers, 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 PPG² 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:

- 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 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 allocation at our client's site for the following reasons:

- A demonstrable unmet housing need within the HNS from local people with Hampshire Choice Housing Register identifies 35 households in need for rental affordable housing.
- A low turnover of relatively large expensive detached open market housing in the area

² Paragraph: 009 Reference ID: 67-009-20190722

- 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, including provision through extra care, close care or care villages offering an extended range of services for older people; often providing a range of accommodation types and with many including a registered care home on the site (although this is not compulsory).

Our experiences of working in the Borough, most notably at Over Wallop³ 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 / 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 East Wellow, the village is already part of a distinct grouping of settlements to the south west of the Borough with West Wellow, Canada (within the New Forest National Park), Woodington and Shootash.

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

³ Land North West of Evans Close, Over Wallop

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 our client's land at East Wellow.

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 our client's land, consistent with the Framework's objectives to promote such sites for housing development.