

Reg 18 Stage 1 Representations
Draft Local Plan 2040

On behalf of Rownhams Promotions Ltd

April 2022

Turley

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Our reference

PIGS3000

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1. Introduction

- 1.1 We are pleased to have this opportunity to comment on the Test Valley Draft Local Plan 2040 Regulation 18 Stage One Consultation Document dated February 2022 (referred to hereafter as the 'Consultation Document').
- 1.2 Turley is acting on behalf of Rownhams Promotions Limited ('client') who is promoting land at Fields Farm, Rownhams Lane, Rownhams ('the Site') for residential development.
- 1.3 Our response below focusses on those matters/questions we consider most relevant, although we reserve the right to comment on additional matters at a later stage of local plan preparation.
- 1.4 These representations have been set out on a chapter-by-chapter basis reflecting the content of the Consultation Document. Specific comments have been made in respect of relevant policies, paragraphs and other defined elements, for which comment forms have been set out. This document and the representation forms should be read together.
- 1.5 In terms of the representation forms, these have been submitted in respect of the following:
 - Plan Period (paras 1.36 to 1.37)
 - Evidence Base (paras 1.38 to 1.44)
 - Regional Content and the Duty to Cooperate (paras 2.16 to 2.20)
 - Vision (para 2.21 to para 2.23)
 - Objectives and Challenges: Housing (para 2.54 to 2.55)
 - Test Valley Sustainable Spatial Strategy (para 3.2 to 3.15)
 - Settlement Hierarchy (Spatial Strategy Policy 1 – SSP1 and Appendix One)
 - Countering Climate Change (Strategic Policy 1)
 - Delivering Healthy, Well-Designed Development (Strategic Policy 2)
 - Delivering Infrastructure (Strategic Policy 5)
 - Housing Provision (Strategic Policy 6 and paras 5.1 to 5.28)
 - Affordable Housing (para 5.29 to 5.31)
 - First Homes (para 5.32)
 - Rural Housing (Para 5.33 to 5.36)

- Housing Mix (paras 5.37 to 5.38)
- Future Employment Needs (para 5.54 to 5.61)

1.6 We would welcome the opportunity to discuss any aspect of these representations in more detail where this would be of assistance to the Council.

2. Chapter 1 – Introduction

2.1 The following representations are identified in respect of this section of the consultation document:

- Plan Period (paras 1.36 to 1.37)
- Evidence Base (paras 1.38 to 1.44)

2.2 Dealing with each in turn:

Plan Period (para 1.36 to 1.37)

2.3 We welcome the extension of the plan period but consider the period to 2040 to not conform with the NPPF or provide sufficient flexibility.

2.4 The current timetable for advancing the Local Plan suggests Adoption in Q3 of 2025, This would result in a plan period of 14 years and 3 months., below the minimum requirement of 15 years (at adoption).

2.5 There is often slippage in the timetable for preparing Local Plans, particularly given the reliance upon others, including advancement of the sub-regional (PfSH) framework and external consultants, and as such it would be prudent to extend the plan period to provide the necessary flexibility.

2.6 To address the potential for delays and to ensure that the minimum timeframe for the plan is set out now, the plan period should be extended for at least a further 2 years (to 2042) or preferably 2045. This would allow for a full and proper plan period to be defined and will ensure that the horizon for meeting growth needs is of a sufficient length to support strategic plan making.

Evidence Base (paras 1.38 to 1.44)

2.7 The evidence base in respect of housing does not properly consider the unmet housing needs from surrounding areas, the need to more fully address housing affordability, or take into account the level of housing (and affordable housing) necessary to support economic prosperity.

2.8 Surprisingly the housing Topic Paper, at paras 4.5 and 4.6 (together with the relevant SHMA and Sustainability Appraisal) considers there not to be a need for additional evidence in these areas. However, this has been done without a full and proper assessment being undertaken (to identify scale), nor the benefits / impacts of such alternative levels of development having been assessed.

2.9 In respect of meeting unmet housing needs, it is our view greater consideration needs to be given to the housing delivery rates in adjacent Authorities, alongside recognition of the impact of the work of the PfSH and prospective impacts of other emerging Local Plans, particularly Southampton.

- 2.10 Historically, across the region there has been a consistent undersupply of housing and growing affordability issues. In 1997 the property price to earnings ratio in Test Valley was 4.9 (i.e. the average property price was 4.9 times the average salary). The ratio is now 10.6, up from 9.8 in 2020. This plan provides an opportunity to help address unmet housing needs in a relatively unconstrained location, where there are substantive opportunities to accommodate development in a sustainable way. This is particularly evident in Southampton, which has been identified as being a location for substantive growth¹, and where Test Valley could help meet unmet housing needs in a location close to where the need arises.
- 2.11 Test Valley experiences significant challenges in respect of housing affordability, where owning a home is out of the reach of the vast majority of the Boroughs younger and less affluent population. This situation is likely to be exacerbated in the coming years without a clear plan or strategy.
- 2.12 In the context of the above therefore, the evidence base should be extended to include the consideration of alternative levels of housing supply and to the full and proper implications of providing such levels of growth, particularly in respect of affordability and the wider spatial strategy of the sub region. To fully address the Council's affordable housing needs, the level of growth required would be circa 437 dwellings per annum. Whilst this does not necessarily translate directly into the housing requirement, it is a clear indicator that assessments of higher delivery are necessary.

¹ 35% upward adjustment to the standard housing methodology for the 20 largest Cities and Urban Centres in England

3. Chapter 2 - Vision, Key Challenges and Objectives

3.1 The following representations are identified in respect of this section of the consultation document:

- Regional Content and the Duty to Cooperate (paras 2.16 to 2.20)
- Vision (para 2.21 to para 2.23)
- Objectives and Challenges: Housing (para 2.54 to 2.55)

3.2 Dealing with each in turn:

Regional Content and the Duty to Cooperate (paras 2.16 to 2.20)

3.3 The consultation describes close working between TVBC and its neighbours. This includes working through the PFSH.

3.4 It is unclear how this working relationship has been carried forward to the draft Local Plan, where no provision or assessment of wider housing needs has been undertaken, or consideration given to the testing of higher development scenarios to account for the way in which such an approach could deliver sustainable development.

3.5 The latest update to the PFSH Statement of Common Ground refers to an unmet housing needs of some 13,000 dwellings to 2036 (an uplift from 10,750 in the previous version of the SOCG). This is reflective of several considerations, the prime one being the 35% uplift to the housing requirement for Southampton as a consequence of Government Policy (Southampton being in the 20 largest cities uplift). There is no mention of this within the regional context section of the plan or a recognition of the importance of Southampton and surrounding areas as being a major driver of meeting housing needs (of acknowledged national importance).

3.6 The plan should address cross boundary matters, including the ability to contribute to higher housing provision, particularly in respect of areas most closely related to the Southampton urban area given that it is unlikely that Southampton City itself will be able to deliver the scale of growth required.

Vision (para 2.21 to para 2.23)

3.7 The vision is generally supported, but should be amended to acknowledge the Borough Councils relationship with Southampton. Test Valley sits adjacent Southampton and includes a proportion of its area that sits within the Southampton conurbation. Southampton is identified as a major location for growth and investment and this should be recognised and acknowledged within the vision. The plan refers to

Andover and Romsey as being market towns, but fails to recognise the influence of Southampton as a major influence and economic hub. The vision should be amended to include reference to Southampton and a commitment to contributing to support its role as the regional capital.

Objectives and Challenges: Climate Change (para 2.26 to 2.27)

- 3.8 The objective of addressing the climate emergency through reducing emissions from new development and facilitating more sustainable living patterns is fully supported. However, the plan fails to achieve this, and an alternative spatial strategy should be adopted which directs most new growth to locations which minimise the need to travel, particularly by private car. Taking into consideration the role of Southampton as the primary economic influence to the south of the District the strategy should be amended by directing a higher proportion of growth closer to this City to better promote the relationship between homes and jobs.

Objectives and Challenges: Housing (para 2.54 to 2.55)

- 3.9 The Vision proposes to provide access to good quality homes that will meet a range of needs and aspirations, including affordable housing. This aspiration is carried forward in the housing objective which seeks to provide a range of homes '*...designed to meet the needs and aspirations of different groups within the community, including a range of affordable housing...*'. Whilst this objective is fully supported, the extent of new homes proposed fails to reflect the genuine needs of the Borough. The plan currently does not seek to meet this objective and will continue an approach of underproviding for genuine need, exacerbating issues of affordability and failing to ensure sufficient access to housing for all the population.
- 3.10 The plan should be more positive and amended to meet the identified affordable need through increasing the number of new homes planned.

Objectives and Challenges: Economy, Employment and Skills (para 2.56 – 2.59)

- 3.11 This objective is broadly supported, although it is recommended for this to be expanded to include reference to the existing and growing employment needs arising from Southampton, and the role Test Valley can play in facilitating economic growth in the sub region.

Objectives and Challenges: Transport and Movement (para 2.60 to 2.64)

- 3.12 The objective of encouraging active and sustainable modes of transport through ensuring new development facilitates improvements to accessibility and connectivity is fully supported. As recognised in para 2.63 focussing growth to the most sustainable locations can help reduce the need and impact of travel, whilst promoting

opportunities for increased use of sustainable modes of transport. Unfortunately, the plan does not achieve this, as it does not recognise the influence of Southampton on travel patterns. The spatial strategy should be amended to take this into account and direct a greater percentage of new housing closer to Southampton which will offer the best opportunities to promote active and sustainable transport choices.

4. Chapter 3 - Spatial Strategy

4.1 The following representations are identified in respect of this section of the consultation document:

- Test Valley Sustainable Spatial Strategy (para 3.2 to 3.15)
- Settlement Hierarchy (Spatial Strategy Policy 1 – SSP1 and Appendix One)

4.2 Dealing with each in turn:

Test Valley Sustainable Spatial Strategy (para 3.2 to 3.15)

4.3 The spatial strategy is generally supported, but it does have a major omission, which is to acknowledge the importance of Southampton and its influence on the pattern of sustainable development in the Borough.

4.4 Whilst Romsey is an influential market town in Southern Test Valley, the primary influence is Southampton, both as a regional capital and as a location for major growth. The lack of acknowledgement of this within the spatial strategy policy (including one that references sustainability as a key objective) is of major concern.

4.5 The vast majority of residents needs within Southern Test Valley are met in some part by Southampton, or provisions within its wider hinterland. This should be recognised within the spatial strategy and a commitment made to promoting connectivity and making provision for development needs in a way that can best compliment the sustainable advantages provided by this location. This will support and enhance the quality of life for Test Valley residents and lead to more sustainable patterns of movement.

4.6 The relationship with Southampton is also a two-way concept. Southampton has a high development requirement, increased by 35% as a consequence of specific Government policy. Those parts of Southern Test Valley that relate to the wider Southampton urban area (Nursling and Rownhams) have a part to play in contributing to meeting those development needs. The spatial strategy should embrace this.

Settlement Hierarchy (Spatial Strategy Policy 1 – SSP1 and Appendix One)

4.7 The underlying principles of the Settlement Hierarchy are generally supported but it is our view that the inclusion of Nursling and Rownhams as Tier 2 is not a proper reflection of its sustainability.

4.8 Whilst para 3.29 recognises that Andover and Romsey have a potential role 'beyond the Borough', and para 3.31 elevates Chilworth on the basis of its proximity to, amongst other things, Southampton it is not clear, either from the plan itself, or the supporting evidence base, what weight is given to the underlying assessment in respect

of proximity to facilities that sit outside of the administrative area of Test Valley. This is significant in respect of those settlements that sit close to major centres. The Topic Paper does not contain maps of the facilities and their proximity to the settlements, nor is this found elsewhere in the evidence base. This should be confirmed and the details published so that they can be assessed appropriately (including the facilities survey responses referenced in para 3.5 of the Topic Paper).

- 4.9 In respect of Nursling and Rownhams, it is particularly concerning as reference is made to only 8 'other facilities'. As there is no data provided to confirm what these 8 are, or more importantly, what is not available, it is not possible to understand whether this settlement is actually better performing if facilities within the wider area (within Southampton – i.e. the Lords Hill District Centre) are taken into account.
- 4.10 Nursling and Rownhams has good accessibility to all of the key facilities and other services identified in paras 3.6 and 3.2 of the Topic Paper (noting that the para numbers are incorrect within that document). This suggests that its status should be more reasonably described as the same as the Tier One settlements of Andover and Romsey and most certainly, greater than the status of other Tier 2 settlements that are significantly less well served than Nursling and Rownhams.
- 4.11 In this context, it is our view that the Settlement Hierarchy should be revised, either to include Nursling and Rownhams as a Tier 1 settlement based on the criteria set out within the Settlement Hierarchy Topic Paper, or to include an additional tier of settlement that reflects the greater levels of sustainability and accessibility available at settlements such as Nursling and Rownhams that benefit from the services of adjacent major settlements (such as Southampton).

5. Chapter 4 - Strategic Policy Framework

5.1 The following representations are identified in respect of this section of the consultation document:

- Countering Climate Change (Strategic Policy 1)
- Delivering Healthy, Well-Designed Development (Strategic Policy 2)
- Delivering Infrastructure (Strategic Policy 5)

5.2 Dealing with each in turn:

Countering Climate Change (Strategic Policy 1)

5.3 Including a Strategic Policy which encourages new development to achieve net zero carbon through both mitigation and adaption is fully supported. However, the current drafting of the policy is confused as it includes elements that can reasonably be construed as being for the direct purposes of development management. The policy should be amended to be more 'strategic' in nature, with Development Management policies introduced (in part 2 of the Plan) which address the specific matters raised.

Delivering Healthy, Well-Designed Development (Strategic Policy 2)

5.4 As a high-level set of objectives, this policy is supported. However, the subsequent detailed policies should be amended to introduce flexible wording to ensure that they function appropriately.

5.5 Criteria I requires applicants for major developments to produce a masterplan and design code or design and access statement as part of the planning application depending on the nature and scale of development. It is not clear from this the level of information required from applicants, and this should be clarified within the supporting text. Similarly, at para 4.60 a request is made for comments on 'our design approach'. It is not clear what this refers to as no specific approach is set out within the text, and again this should be clarified.

Delivering Infrastructure (Strategic Policy 5)

5.6 This policy also falls between one that sets out strategic intent and one that could be construed as being one of development management. It states that '*development will be required to*', before then listing four broad areas. When taken literally, it essentially states that all development must provide infrastructure or a financial contribution through a legal agreement. This is clearly relevant in some instances but will not be

required in all cases. The wording of the policy should be reviewed and appropriate clarification provided.

- 5.7 The principles of the policy, if interpreted only as strategic priorities, are generally supported. Addressing infrastructure impacts is important. However, the policy does not reference viability. This is essential if there is to be an appropriate balance between delivery of development that meets an identified need and infrastructure impacts.

6. Chapter 5 - Meeting our Needs

6.1 The following representations are identified in respect of this section of the consultation document:

- Housing Provision (Strategic Policy 6 and paras 5.1 to 5.28)
- Affordable Housing (para 5.29 to 5.31)
- First Homes (para 5.32)
- Housing Mix (paras 5.37 to 5.38)
- Future Employment Needs (para 5.54 to 5.61)

6.2 Dealing with each in turn:

Housing Provision (Strategic Policy 6 and paras 5.1 to 5.28)

6.3 In setting out our comments, we have been mindful of the detailed submission provided by the Home Builders Federation and are supportive of their comments. We have not repeated them here to ensure brevity in our representations but have focussed on some key aspects that are of particularly relevance to our position.

6.4 In our view, the Local Plan has not been as positively prepared as it could as it does not comprehensively address the level of housing need that exists within the Borough. There are three main drivers for this conclusion:

- There are unmet housing needs within the wider area that should be considered, and additional provision made to meet through this plan;
- The plan does not appropriately respond to affordable housing needs; and
- The plan does not take into account the higher levels of housing needed to support economic growth.

6.5 In our view, the housing provisions should be revised upwards.

6.6 The reasons set out above are exceptional circumstances which rightly justify the need to increase the housing requirement above that set out under the standard methodology. This should be the subject of testing in advance of the next stage of the Local Plan.

6.7 In respect of wider housing needs, there is an identified unmet need within the PfSh area (13,000 units to 2036) and both Southampton and New Forest have issues in terms of delivery.

- 6.8 There is a need for a realistic and responsible approach to unmet requirements and a genuine assessment of where supply has failed to come forward in the wider area, or where requirements are rising (as they are in Southampton), with due consideration to increasing supply to meet those wider needs.
- 6.9 In respect of affordable housing, the plan does not consider how a greater level of new affordable homes can be delivered through an increase in the total housing requirement. The annual requirement (of circa 450 affordable units per annum) is not currently being met (there is a substantial and ongoing shortfall) and this will continue to be the case under the plan as proposed. There should be a specific response within the plan, by way of increased overall requirement to address the identified shortfall to ensure it is positively prepared.
- 6.10 Finally, in terms of Southampton specifically, this City has been identified for a 35% increase in housing requirement under government policy. This should be reflected in the process of assessment within the plan and confirmation sought from the City Council as to whether they are able to meet their need. Should this not be possible provision should be made to allow Test Valley to make a contribution to meeting that need, in addition to its own needs, with this need accommodated closest to where the need arises from. Locations such as Nursling and Rownhams form part of the wider Southampton hinterland and have an important role to play. As Southampton will be unable to meet its full need the assessment of housing requirements should include this as a specific additional need beyond the scope of the standard approach.
- 6.11 We are supportive of the continued identification of two housing market areas and the shift in % distribution between them. In our view, Southern Test Valley could indeed take a higher percentage of growth and to do so would deliver sustainable development and also contribute to wider considerations, such as the identification of Southampton as an enhanced growth area.
- 6.12 As proposed, the split between the HMAs would be based on existing population levels (in each respective area). Given that this is essentially a reflection of historic patterns of growth, there is a need to apply a further consideration, which would be to reflect the identification of Southampton as being a location for enhanced growth. This is a clear policy intent of Government and should be considered not just for Southampton City itself (as an administrative entity) but also to those areas that are directly related to it (such as parts of Southern Test Valley). This should be the subject of assessment, and in our view would support testing of a 45/55 and 50/50 level splits, or a specific additional contribution (by way of increase in the overall requirement).

Affordable Housing (para 5.29 to 5.31)

- 6.13 The approach to affordable housing requires further consideration with the benefit of detailed viability evidence. This should be in the context of plan wide requirements and in relation to individual allocations.
- 6.14 We reserve comment pending the assemble of this evidence.

First Homes (para 5.32)

- 6.15 We fully support the inclusion of a policy on First Home Exception Sites and welcome the opportunity to comment on this in due course.

Rural Housing (paras 5.33 -5.36)

- 6.16 We fully support the inclusion of a policy on First Home Exception Sites and welcome the opportunity to comment on this in due course.

Housing Mix (paras 5.37 to 5.38)

- 6.17 The impact of housing mix on viability should be a specific consideration in the assembly of evidence as the plan moves forward. This should also include consideration of positive policy interventions, such as the need for family accommodation as well as smaller units.

Future Employment Needs (para 5.54 to 5.61)

- 6.18 The content of the consultation document draws heavily on the PfSH assessment work but then seeks to move away from its conclusion. We would encourage the plan to adopt a positive approach and respond to the identified needs where possible both in quantitative terms and in supporting the delivery of high-quality employment opportunities that underpin the creation of sustainable patterns of growth. The link between meeting employment and housing needs is fundamental to the wider economy.

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