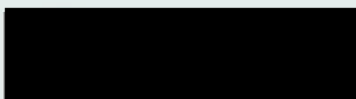
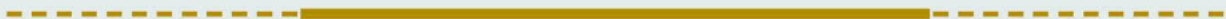




# Test Valley Local Plan

**Regulation 18 Version – Stage 1**

April 2022



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# 1 INTRODUCTION

## 1.1 Context

1.1.1 Gladman welcome the opportunity to comment on the Test Valley Local Plan Regulation 18 Stage 1 consultation.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have significant experience in contributing to the plan making process through the preparation of written submissions and participation at Examination in Public. It is on the basis of this experience that these representations are made.

1.1.3 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

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

1.1.5 Further details of our land interests are provided in the Story Map attached at appendix 1 of this submission. These sites comprise:

- Land at Flexford Road, Valley Park
- Land at Halterworth Lane, Romsey

- Land off Romsey Road, West Wellow

1.1.6 Gladman would welcome the opportunity to discuss the contents of the Story Map with authority's officers, and how the sites we are promoting could help the Council in delivering the housing requirement and a balanced spatial strategy for the borough.

## 2 LEGAL COMPLIANCE

### 2.1 Duty to Cooperate

- 2.1.1** 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. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of plan preparation.
- 2.1.2** The DtC is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance (PPG) it is clear that it is intended to produce effective policies on cross boundary strategic matters. In this regard, Test Valley Borough Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside existing joint working arrangements, to ensure that cross boundary strategic issues are satisfactory addressed.
- 2.1.3** The revised Framework 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. Planning guidance sets out that local planning authorities should produce, maintain, and update one or more SoCG, throughout the plan making process<sup>1</sup>. 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.
- 2.1.4** Whilst recognising the strong record of ongoing collaboration between the Partnership for South Hampshire (PFSH), outcomes of work around the distribution of unmet needs arising from the PFSH area remain incomplete and should be addressed as a matter of priority.
- 2.1.5** The PFSH authorities SoCG (October 2021) references the need to use the Government's Standard Methodology to identify its housing needs. At present, the unmet needs for the PFSH area is estimated to be in the region of 13,000 homes, based on the current

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<sup>1</sup> PPG Reference ID: 61-001-20180913

methodology as set out in the latest SoCG, compared to the previous figure of 10,750 dwellings set out in the 2020 SoCG. This figure is derived from 11 Councils who are all at varying stages of plan preparation.

2.1.6 To re-distribute this need the PFSH authorities are currently undertaking a number of workstream studies. These include:

- Strategic Development Opportunity Area (SDOA) assessments including traffic modelling and transport impact assessments for the SDOAs.
- Economic, employment and commercial needs study.
- Joint Strategic Environmental Assessment (SEA)/ Sustainability Appraisal (SA), Habitats Regulations Assessment (HRA) and Appropriate Assessment (AA).
- Green Infrastructure Needs and consideration of mechanisms on how to achieve Green Belt designation.

2.1.7 It is understood that consultants Stantec and ITP were appointed in June 2020 to undertake comparative assessments relating to the SDOAs and to identify further spatial options and potential choices for land to accommodate strategic development. Unfortunately, the timetable for this study has been delayed due to issues concerning the use of the Solent Sub Regional Transport Model. It is now anticipated that the final report on the comparative assessment of the SDOAs will be presented to the Joint Committee in Q3 2022.

2.1.8 It is vital to the soundness of the Local Plan Review that collaboration between the PFSH authorities continues and an effective strategy is set in place which positively deals with unmet needs of the PFSH area. In going down the route of identifying SDOAs to address unmet housing needs it must be recognised that the geography of the sub-region is complex and in terms of delivery it will likely fall upon Test Valley to take more than its fair share. This need is arising now and whilst the outcomes of the SDOA work is one avenue for delivery, the allocation of sites below the 500 dwelling SDOA threshold will likely be required to ensure the timely delivery of unmet housing needs.

2.1.9 Since the need to demonstrate effective cooperation is an ongoing issue, Gladman reserve the right to provide further comments in relation to this matter once further evidence becomes available.

## 2.2 Sustainability Appraisal

- 2.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 2.2.2 Test Valley should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Test Valley Local Plan's decision-making and scoring should be robust, justified and transparent.
- 2.2.3 The work undertaken so far has assessed a number of Spatial Strategy Options against the Sustainability Objectives. These include sustainable transport hubs, economic centres, focus on Andover & Romsey, support larger settlements and dispersed to all parishes.
- 2.2.4 Following testing of the options considered, the Council believes a hybrid approach is anticipated to have strong positive effects in relation to the local economy, including supporting town centres and the rural economy, with positive effects for objectives on maintaining and improving access to services, facilities, infrastructure and sustainable travel modes. This is considered appropriate.
- 2.2.5 In identifying and assessing reasonable alternatives relating to the scale of housing need the SA considers that only one reasonable option has been identified, which is applying the standard method to identify local housing needs. The Council does not consider the need to accommodate a higher level of housing growth to assist in delivering unmet housing needs from neighbouring authorities to be a reasonable alternative. This is on the basis that no formal requests have been received regarding any unmet housing needs that would need to be addressed in Test Valley.
- 2.2.6 Gladman does not consider this proposed approach to be appropriate or effective. As highlighted in section 2.1 above, there is significant uncertainty over the level of unmet housing needs arising from the PFSH area which needs to be redistributed between the PFSH authorities. Test Valley will almost certainly need to accommodate unmet needs from neighbouring authorities and this should be factored into the assessment once greater



certainty is provided over the quantum of unmet need Test Valley will need to accommodate.

## 3 NATIONAL PLANNING GUIDANCE

### 3.1 National Planning Policy Framework

3.1.1 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 and July 2021. These publications are revisions to the initial 2012 Framework and implemented changes that were informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and Planning for the Future consultation.

3.1.2 The revised Framework (2019) introduced a number of major changes to national policy which provide further clarification to national planning policy as well as new measures on a range of matters. Crucially, 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. In particular, Paragraph 16 of the Framework (2021) 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)."**

3.1.3 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 be brought forward, without delay, to meet housing needs.

- 3.1.4 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.5 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. While Annex 2 of the Framework (2021) provides definitions for the terms “deliverable” and “developable”.
- 3.1.6 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2021).
- 3.1.7 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years (See paragraph 22).
- 3.1.8 The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit which helps local communities to shape local design needs and provide guidance for creating environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.

## 3.2 Planning Practice Guidance

- 3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy.

The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.

- 3.2.2 The Standard Method was introduced by the Government to simplify the process of defining housing need, avoid significant delay in plan preparation and ultimately facilitate the Government's ambition to achieve 300,000 new homes annually.
- 3.2.3 Revisions to the PPG on the 20th February 2019 confirmed the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method .
- 3.2.4 In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. Typically, many planning experts advocate the need to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply to ensure a responsive supply of housing land which is capable of responding to changes in the market.

## 4 LOCAL PLAN REGULATION 18 – STAGE 1

### 4.1 Background

4.1.1 The following section of the representations responds to specific policies set out in the consultation documents.

### 4.2 Plan Period

4.2.1 The proposed plan period covers the period 2020 – 2040. It is anticipated that the plan will be adopted in Q3 2025 and therefore will provide a minimum of 15 years from adoption. This is supported and in line with national policy. However, the Council may need to further extend the plan period should any slippage occur particularly around the distribution of unmet needs concerning the PFSH area in order to identify additional housing land.

### 4.3 Vision

4.3.1 Gladman support the proposed vision which seeks to provide access to good quality homes to meet a range of needs and aspirations as well as delivering well designed developments to a high standard that encourage inclusivity, health and security. In addition, Gladman support the proactive approach to ensuring the borough's economy will be thriving and which seeks to ensure growth across a range of sectors, including the high technology, green industries and the visitor economy.

### 4.4 Plan Objectives

4.4.1 In principle, Gladman support the proposed plan objectives particularly in relation to the housing objective which seeks to provide a range of homes that are fit for purpose and designed to meet the needs and aspirations of different groups within local communities.

4.4.2 In addition, we support the transport objective which seeks to encourage active and sustainable modes of transport and ensuring new development facilitates improvements to accessibility, safety and connectivity in transport infrastructure in order to reduce the impact of travel by private car.

### 4.5 Spatial Strategy

4.5.1 The evidence undertaken so far has considered a number of options culminating in the Spatial Strategy Topic Paper. This assessment resulted in a hybrid approach of the three options presented and has been informed by the SA of these options. These options seek

to focus and support regeneration of Andover and Romsey town centres, supporting growth at key employment areas along with supporting growth at larger urban and rural communities throughout the borough.

- 4.5.2 Gladman support the Council's decision in directing growth towards Andover and Romsey as these are the largest settlements in the Borough, with the widest range and number of facilities to meet local communities needs. Logic dictates that these settlements provide the greatest range of services and facilities, with key transport links and access to local employment opportunities and should therefore receive a sufficient amount of growth to support their needs. However, it therefore follows that the most sustainable settlements outside of these areas (such as Valley Park and Wellow), should also be directed proportionate growth to meet housing needs as these settlements play an important role in providing key essential services to local community members. The benefit of focusing growth towards sustainable settlements lower down the settlement hierarchy identified in Policy SSP1 is that they already have access to infrastructure, services and facilities that are already in place to accommodate the needs of both existing and future residents.

## 4.6 Spatial Strategy Policy 1 (SSP1): Settlement Hierarchy

- 4.6.1 Gladman are supportive of the proposed settlement hierarchy outlined in the consultation document. It identifies Andover and Romsey as Tier 1 settlements. Valley Park and Wellow are identified as a Tier 2 settlements.
- 4.6.2 The proposed settlement hierarchy differs from that contained in the adopted Local Plan through the removal of key service centres and elevates Wellow's status from a Tier 3 to Tier 2 settlement. The recognition of Wellow as a sustainable settlement capable of accommodating sustainable growth opportunities is therefore supported.
- 4.6.3 However, at this stage the proposed Spatial Strategy Policy 1 (SSP1) does not outline how development will be brought forward in line with the settlement hierarchy. It is assumed that decisions relating to the spatial distribution will be considered as part of the Regulation 18 Stage 2 consultation. It will be vital to the soundness of the Local Plan that the Regulation 18 Stage 2 consultation sets out how the apportionment for planned growth will be factored into the settlement hierarchy, particularly in relation to Tier 2 settlements. Indeed, the approach going forward will need to be aspirational and growth orientated in line with the ethos of the Framework and the need to boost significantly the supply of housing together with the need to accommodate unmet housing needs from neighbouring authorities.

## 4.7 Meeting Housing Needs

### Housing Needs

- 4.7.1 The Council has prepared a Strategic Housing Market Assessment (SHMA) and a Housing Market Area Study (HMAS). The SHMA (2022) sets out the Council's approach to its local housing need assessment and concludes that using the Standard Method results in a local housing need figure of 541 homes per annum from 2020 onwards i.e. 10,820 dwellings over the period 2020 to 2040.
- 4.7.2 The Council is proposing to continue its approach to split the housing requirement between the Northern Test Valley Housing Market Area and Southern Test Valley Housing Market Area to provide 6,167 dwellings and 4,653 dwellings respectively.
- 4.7.3 Whilst Gladman are supportive of the approach using the Standard Method to identify its housing needs. Gladman remind the Council that the housing figure identified using the Standard Method only identifies the baseline housing needs derived utilising a three-step process defined in the PPG, and as such, only represents the starting point for the consideration of housing needs. The PPG confirms the NPPF position that the Standard Method only provides the minimum level of housing need for a local authority area and does not take into consideration other factors which affect demographic behaviour. The PPG also sets out that there will be circumstances where the housing requirement could be increased to a level which is higher than that identified through the Standard Method. These circumstances include (but are not limited to):
- Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. housing deals).
  - Where strategic infrastructure improvements are planned that would support new homes.
  - Where an authority has agreed to take on unmet need, calculated using the Standard Method from neighbouring authorities, as set out in a SoCG.
  - Previous delivery levels, where these have exceeded the minimum figure identified; and
  - Recent assessments of need, such as a SHMA, where these suggest higher levels of housing needs.

4.7.4 The SHMA has assessed whether exceptional circumstances exist to justify an alternative approach to using the local housing need assessment as the basis for the Council's housing requirement. Such approaches would be based on growth funding, strategic infrastructure improvements and addressing the unmet housing needs from surrounding local authorities. Paragraph 5.12 states that the SHMA concludes that none of these approaches currently apply to Test Valley and that at present there is no evidence of any unmet housing need in neighbouring local authority areas.

4.7.5 Gladman raise concerns regarding the Council's approach. The SHMA clearly defines the Housing Market Areas relevant to Test Valley and recommends at paragraph 1.49- 1.50 that:

*"Where these areas are identified the relevant local planning authorities are required to cooperate on strategic matters. This includes, according to Paragraph 11 of the Plan-Making PPG (reference ID: 61-011-20190315), agreeing a statement of common ground which contains:*

- *"If applicable, the housing requirements in any adopted and (if known) emerging strategic policies relevant to housing within the area covered by the statement"; or*
- *"distribution of needs in the area as agreed through the plan-making process, or the process for agreeing the distribution of need (including unmet need) across the area."*

***It will be therefore important for the Council to continue to liaise with surrounding authorities (and the National Park Authority) on strategic planning matters including discussing any issues associated with unmet housing needs (either from Test Valley or neighbouring areas or National Park)."*** (emphasis added)

4.7.6 Paragraph 3.18 further sets out that the PFSH authorities are currently in the process of updating its SoCG to provide a framework for the future planning of the sub-region taking account of development needs. Whilst to date, no formal request have been made to meet any potential unmet housing needs as these will be discussed in due course, there is a significant possibility that Test Valley will need to accommodate unmet needs of the wider sub-region. This position has not been considered in the SHMA (2022).

4.7.7 Gladman does not consider the Council's consideration that no unmet needs will need to be factored into the assessment above standard method. This is not considered to be positively prepared. Despite no formal requests being made to date, unmet needs arising



from the PfSH area is well known and stands in the region of circa 13,000 dwellings. Given Test Valleys location and proximity to Southampton it is well located to accommodate a significant proportion of the current unmet needs arising from the City and this will need to be factored into the assessment prior to identifying locations for development as part of the Regulation 18 Stage 2 consultation.

- 4.7.8 Furthermore, with reference to the PPG above, the latest Housing Implementation Strategy (2021) confirms that the Council has delivered 7,939 dwellings since 2011. This represents an over delivery of 2,059 dwellings (206dpa). Given the record of persistent over delivery it therefore stands to reason that the housing requirement should be increased.

#### Housing Supply

- 4.7.9 Table 5.3 identifies a borough wide residual requirement of 4,453 dwellings over the period 2020 to 2040. This figure is split between the two very distinct HMAs and requires Southern Test Valley to accommodate a residual requirement of 948 dwellings and Northern Test Valley to accommodate 3,505 dwellings.

- 4.7.10 Notwithstanding comments in relation to unmet needs of neighbouring authorities, the Council will need to be mindful that housing sites identified may not deliver as anticipated. To ensure a positive approach is set out it is recommended that a flexibility buffer is provided. This will ensure the Local Plan is consistent with the requirements set out in paragraph 82 of the Framework which requires the Local Plan to be flexible enough to accommodate needs not anticipated in the plan. It is therefore important that a flexibility factor is included so that sufficient capacity exists to ensure all needs are met in full. It therefore stands to reason that in order for the minimum number of homes to be delivered, then the Council will need to allocate beyond its minimum housing requirement in a reasonable way. The only way of achieving this is to provide a healthy contingency within its housing supply of development land through the identification of additional housing allocations.

- 4.7.11 There is no hard and fast rule for flexibility that should be built into Local Plans to deliver the housing requirement but many experts in the housing sector often advocate the use of a 20% buffer of sites.

## 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 and associated community infrastructure across Test Valley borough. The sites are situated in sustainable locations and offer the potential to deliver high quality residential development to meet the local planning authority's housing needs.

5.1.2 Further details of our site interests are provided in the Story Map attached to this representation at appendix 1. In no particular order of important or suitability for development, the sites comprise:

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

5.1.3 As a first point, Gladman can confirm that all three sites are genuinely available for development and are deliverable. There are not expected to be any insurmountable constraints to the development of the sites as proposed.

5.1.4 Gladman has a proven record in ensuring the delivery of sites. We keep a detailed record of all sites which we gain a planning permission and monitor progress from sale to a housebuilder through the remainder of the planning process up to first completions on the ground. We are happy to provide you with further details regarding this should you wish, the average timescale from permission to a spade in the ground is around 18 months.

5.1.5 Gladman would welcome the ability to meet with the local planning authority to discuss the contents of the Story Map with the authority's officers, and how the sites we are promoting could help the Council in delivering the housing requirement as well as a balanced spatial strategy for the borough. Gladman look forward to engaging with the Council further as work on the authority's new Local Plan progresses and invite the Council to contact us in this regard following the end of the Stage 1 consultation.

## 6 CONCLUSIONS

### 6.1 Summary

6.1.1 Gladman welcomes the opportunity to comment on the Test Valley Local Plan Regulation 18 Stage 1 consultation and hopes that these representations have been 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 appropriated 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 has provided a number of comments on a series of themes covered in the Local Plan consultation document. A key issue for the Local Plan is how the unmet housing needs of the PFSH area is going to be addressed. It is currently anticipated that the findings of the SDOA work will be published in Q3 2022 and leaves little time to consider the evidence ahead of the Regulation 18 Stage 2 consultation which is expected to be published in Q4 2022. Indeed, it is currently unknown if lengthy negotiations between authorities will follow and if any disagreement arises with the apportionment between the PFSH authorities which may delay timescales in preparing the Local Plan as anticipated.

6.1.4 Of critical importance is that agreement must be reached on the unmet housing needs of neighbouring authorities prior to selection of sites through the Regulation 18 Stage 2 consultation.

6.1.5 We hope that you have found these representations informative and useful towards the preparation of the Test Valley Local Plan and Gladman would welcome further engagement with the Council to discuss the considerations within the future Local Plan Review documents as well as further discussions regarding the potential allocation of Gladman's land interests.



