

Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 1

COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 1 document for public consultation. This consultation document sets out draft strategic planning priorities for Test Valley supported by a number of strategic policies.

The consultation period runs from Friday 11 February to noon on 8 April 2022. Please respond before the close of the consultation period so that your comments may be taken into account.

You can respond to our consultation by filling out the form below. This form has two parts:

Part A: Your Details

Part B: Your Comments (please fill in a separate sheet for each comment you wish to make)

Further information can be found on our website at:

www.testvalley.gov.uk/localplan2040

Once the form has been completed, please send to
[REDACTED] by **noon on 8 April 2022**.

Following receipt of your comments from, we will keep you informed of future consultation stages unless you advise us that you want to opt out of such communication.

If you are unable to send via email, please send a postal copy to our address below.

Contacting us

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

Tel: [REDACTED]

Website: www.testvalley.gov.uk/nextlocalplan

Email: [REDACTED]

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Mr	First Name*	James
Surname*	Millard		
Organisation* (If responding on behalf of an organisation)	Blue Fox Planning Ltd		

Please provide your email address below:

Email Address*	[REDACTED]
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Alternatively, if you don't have an email address please provide your postal address.

Address*	[REDACTED]	
[REDACTED]	[REDACTED]	
[REDACTED]	Postcode	[REDACTED]

If you are an agent or responding on behalf of another party, please give the name/company/organisation you are representing:

Taylor Wimpey UK Ltd

Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment. All representations and related documents will be held by the Council for a period of 6 months after the next Local Plan is adopted.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are available on our website

<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

Part B: Your Comments

Please use the boxes below to state your comments. Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box. For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

General
Please see attached representations

Paragraph Ref	Specific Comments
	Please see attached representations

Please use next page if necessary

What happens next?

All valid responses received within the consultation period will be acknowledged and you will be given a reference number. Please quote this number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.



**TEST VALLEY BOROUGH COUNCIL
CONSULTATION FOR LOCAL PLAN 2040
REGULATION 18 STAGE 1**

Prepared on behalf of: Taylor Wimpey UK Ltd

April 2022



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1. Introduction

- 1.1 On behalf of my client, Taylor Wimpey UK Ltd, Blue Fox Planning Ltd is instructed to submit representations in response to the Regulation 18 (Stage 1) Local Plan 2040 consultation. In preparing these representations we have had regard to the published consultation documents and supporting evidence base.
- 1.2 Taylor Wimpey UK Ltd are currently completing the Augusta Park development at Andover and have submitted comments to previous rounds of consultation on the Local Plan, including the Issues and Options (2018) and the Refined Issues and Options (2020).
- 1.3 It is understood that this Regulation 18 Stage 1 consultation is not focused on site options as potential allocations to deliver the future growth needs of the Borough.
- 1.4 It is explained with the consultation documentation that the Regulation 18 Stage 2 will be more site specific. Building on the emerging Spatial Strategy, as presented within this current consultation, we acknowledge and support the continued recognition that Andover will remain a focus for growth over the Plan period to 2040.
- 1.5 Andover represents a key economic centre, not just in the Northern Test Valley sub area, but also for the Borough. The role and function of Andover supports a scale of development that is commensurate with the extensive range of services and facilities available, including major areas of employment, retail and education.
- 1.6 It is therefore logical that through future iterations of the Local Plan, sustainable development opportunities at Andover should be explored. In response to earlier rounds of consultation, additional land at Finkley Down Farm (Andover) has been promoted as a logical and coherent development option, as an extension to the Augusta Park development area.
- 1.7 Land at Finkley Down Farm has also been promoted through various iterations of the Strategic Housing and Economic Land Availability Assessment (SHELAA), and its predecessor, the Strategic Housing Land Availability Assessment (SHLAA). Land at Finkley Down Farm is identified in the 2021 SHLEAA – site reference 165.
- 1.8 The representations set out herein are focused principally on the main areas of discussion, specifically in terms of the emerging Spatial Strategy and settlement hierarchy and the distribution of future growth requirements at the strategic Housing Market Area level.
- 1.9 We look forward to commenting on future stages of the Local Plan, specifically in terms of demonstrating how land at Finkley Down Farm can make an important contribution to housing delivery, supporting the role of Andover in a sustainable manner whilst responding positively to wider objectives of the Local Plan.

2. Land at Finkley Down Farm – SHELAA 165

- 2.1 As an extension to the Augusta Park development area, Land at Finkley Down Farm provides a genuine opportunity to support the delivery of a significant number of new homes and associated infrastructure, and in doing so, supporting the role of Andover as a top tier settlement.
- 2.2 Representations submitted on behalf of Taylor Wimpey UK Ltd to previous iterations of the current Local Plan review, have sought to demonstrate the absence of any major constraints to delivery at this site.
- 2.3 The 2021 update to the Strategic Housing & Economic Land Availability Assessment (SHELAA), reinforces our previously stated position that there are no site-specific constraints that would suggest development at Finkley Down Farm is not capable of being delivered.
- 2.4 Indeed, its location adjacent to Andover, is recognised within the SHELAA as being accessible to the widest range of facilities and services which are present at this major centre. It being a location which also maximises sustainable transport choices and is more accessible due to better public transport provision.
- 2.5 Development at Finkley Down Farm can support a highly sustainable movement strategy, maximising sustainable transport choices, specifically public transport connections to key destinations in and around Andover.
- 2.6 As the Local Plan is progressed, including new strategic and non-strategic policies that are essential to deliver the vision and objectives of the Local Plan, the opportunities presented by the Finkley Down Farm site, to support and implement the overarching strategy for growth at a top tier settlement can be articulated further.
- 2.7 Responding positively and creatively to support a highly sustainable pattern of development, incorporating robust and deliverable strategies for Carbon reduction/neutral measures, net gains in biodiversity, landscape enhancements and protections, and protection of heritage assets will frame the emerging proposals at Finkley Down Farm.
- 2.8 We look forward to the opportunity to discuss the suitability of the Finkley Down Farm site, and to explain the evolution of proposals since our previous representations and critically, to demonstrate how Finkley Down Farm represents a highly sustainable and ultimately deliverable development opportunity at Andover.

3. Chapter 2: Vision, Key Challenges and Objectives & Strategic Policies (Chapter 4)

- 3.1 The proposed 'Vision' for the Borough provides the context within which the Local Plan 2040 is to be prepared and how it intends to respond to identified objectives and challenges. The Vision should be aspirational, but also realistic and measurable so that progress towards delivering this Vision can be assessed through the periodic reviews of the Local Plan.
- 3.2 Chapter 2 also sets out the Objectives and Challenges, all of which are reasonable and provide a framework for the preparation of specific policies in future iterations of the Local Plan.
- 3.3 Consistency with the National Planning Policy Framework (NPPF) is essential in terms of achieving sound policies, and this includes ensuring that policy requirements are based on robust evidence.
- 3.4 The potential impact on future development in terms of viability should also be part of this process. This is necessary to ensure that policy burdens are understood in their totality so that the Local Plan balances the need to meet identified objectives, can respond positively to known challenges, whilst ensuring that the future growth needs are met through the delivery of sustainable patterns of development.
- 3.5 We reserve the right to comment on specific policies as they are presented in future iterations of the Local Plan.
- 3.6 Chapter 4 of the consultation document sets out the following 'Strategic Policies'.
 1. Countering Climate Change
 2. Delivering Healthy, Well-Designed Development
 3. Delivering Development and Regeneration in Andover and Romsey Town Centres
 4. Delivering High Quality Development in Town Centres
 5. Delivering Infrastructure
- 3.7 These Strategic Policies are necessarily high-level and reflect the objectives, challenges and priorities referenced within the Regulation 18 Stage 1 consultation document. We have no specific comments on these Strategic Policies at this time, but reserve the right to comment on how these are implemented through future policies, including site specific policies to be set out in subsequent versions of the Local Plan.

4. Chapter 3 – Spatial Strategy

- 4.1 The purpose of the Spatial Strategy is to facilitate the delivery of the Local Plan objectives, by setting out the direction for the location and types of development throughout the Borough. Our comments on the Spatial Strategy and associated Settlement Hierarchy should be read in conjunction with our specific comments on identified needs, as set out within Section 5.
- 4.2 **Section 4** of the Spatial Strategy Topic Paper sets out a number of potential options for distributing future development throughout the Borough. These being:
- A. Focused growth through new village(s) or settlement(s);
 - B. Concentrating growth at key sustainable transport hubs along public transport routes;
 - C. Concentrating development at key economic or employment centres;
 - D. Focusing development in the towns of Andover and Romsey;
 - E. Distributing development to support the largest settlements (incorporating more urban and rural locations); and,
 - F. Dispersed growth to all parishes.
- 4.3 The Spatial Strategy Topic Paper considers that Option A (new village/settlement) is not a reasonable option as the overall scale of housing need does not justify an entirely new settlement and moreover, that such an option would be unlikely to meet housing needs in the short-term. Consequently, it is the remaining options (B to F) which are considered to represent genuine reasonable alternative options and have been considered through the Sustainability Appraisal (SA) process.
- 4.4 **Paragraph 4.7** explains that Option F (dispersed growth to all Parishes) has emerged as an option which is not preferred as it could lead to development in locations which are not well served by a sufficient range of services, facilities and sustainable travel networks, resulting in greater dependence on car-based travel. It also has implications on matters such as climate change, as well as rural and environmental landscapes.
- 4.5 **Paragraph 4.8** considers that Option B (concentrating development at key transport hubs) is also not a preferred option. This is due to the location of sustainable transport hubs within the Borough, which do not align with access to other key services, facilities and employment.
- 4.6 **Paragraph 4.9** states that the remaining options (C, D, and E) each performed ‘fairly well’ in the SA assessment process, which is summarised in the assessment of these options against the Sustainability Objectives (**Table 11** of the SA). On this basis, the emerging Spatial Strategy is based on a ‘hybrid’ approach, combining elements each of these three options.

- 4.7 **Paragraph 4.15** of the Spatial Strategy Topic Paper explains that this hybrid approach reflects a slightly more dispersed growth approach than currently set out in the Adopted Local Plan, by focusing growth not just at the largest settlements, but also at larger and more sustainable rural settlements within the Borough. In doing so, helping to maintain and enhance the sustainability and vitality of these settlements.
- 4.8 **Paragraph 7.9** of the SA acknowledges the implications of all the options depend on the way the options are implemented, including specific locations which will come forward in future iterations of the Local Plan.
- 4.9 **Appendix II** of the SA provides a detailed analysis of the Spatial Strategy options which has then influenced the Settlement Hierarchy. In many cases the associated score against the Sustainability Objectives is “I” which means the impact on the objective depends on implementation.
- 4.10 Therefore, whilst it is the conclusion of the SA that Options C, D and E are reasonable at this point in the plan-making process, the extent to which these options can support the Sustainability Objectives will depend on those sites/locations which are identified for development and any associated mitigation necessary.
- 4.11 Site specific assessments through the SA process will provide greater certainty in terms of how the objectives will be impacted. Whilst this is likely to be a relatively straight forward exercise for larger sites and the main settlements, it is not clear whether future iterations of the SA will assess site options at lower tier settlements.
- 4.12 Moreover, it is not currently clear as to how far the Local Plan 2040 will go in terms of site allocations and how this relates to Neighbourhood Plans in the Borough. The Stage 1 Local Plan identifies the housing requirement and associated split between the Northern and Southern Housing Market Areas and we comment on this separately. What is not clear at this stage is how levels of development will be assigned to specific settlements and/or tiers of settlements based on the settlement hierarchy.
- 4.13 Given the uncertainty expressed within the SA, in terms of a range impacts on objectives being dependent upon implementation, greater clarity is needed in future iterations of the Local Plan to determine how this ‘implementation’ will be assessed.

Settlement Hierarchy

- 4.14 **Paragraph 3.10** of the Stage 1 consultation document recognises that the market towns of Andover and Romsey are the largest settlements in the Borough and remain at the core of the Spatial Strategy and continue to be a focus for development. Whilst the emphasis is on the regeneration of the town centres, it is recognised that there remains a need to consider greenfield sites at these settlements, and this will inform the Stage 2 Regulation 18 consultation.

4.15 **SSP1 (Settlement hierarchy)** classifies settlements within the Borough based on the methodology set out in the associated Topic Paper. **Paragraph 4.2** of the Settlement Hierarchy Assessment Topic Paper (Feb 2022), classifies Andover and Romsey as Tier 1 settlements, explains that:

“Andover and Romsey stand out as being the most sustainable, each with a full range of services and a high level of accessibility by public transport. There are no other settlements within the Borough which offer such a complete range of facilities, with good access to jobs, key services and infrastructure.”

4.16 **Para 4.4** of the Topic Paper explains there are a number of sustainable settlements that sit below Tier 1 (Tier 2), and due to their role and function and broad range of facilities they are more sustainable than the more rural settlements in the Borough – the accessibility to large urban areas, such as Andover, Southampton, Eastleigh and Chandler’s Form has also been taken into account in formulating the hierarchy.

4.17 The methodology which has informed the Settlement Hierarchy is based on an assessment of how sustainable a settlement is, which in turn dictates its classification within the hierarchy. This is based on an assessment of local services and facilities and the overall accessibility of settlements to services and facilities.

4.18 Such an approach is understood and provides a basis for direct comparison between settlements. However, the hierarchy and associated methodology does not consider environmental factors in terms of the capacity of such settlements to accommodate additional development without undermining wider objectives, such as the protection of the natural environment, landscape and heritage etc.

4.19 It is acknowledged that at this stage in the plan-making process, the classification of a settlement within the hierarchy does not determine the scale of growth that will be expected to be accommodated. This will need to be guided by other policies to be prepared as the Local Plan progresses.

4.20 Notwithstanding this, there are some immediate challenges for settlements and their associated place in the hierarchy and their capacity to accommodate growth as part of the emerging Spatial Strategy.

4.21 By way of example, Hurtsboune Tarrant & Ibthorpe are located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB) but are classified as Tier 2 settlements within the hierarchy. There is little explanation as to how a settlement which is in the AONB can support housing delivery as envisaged by the Spatial Strategy and associated settlement hierarchy.

4.22 There also needs to be consideration as to how extant policies in the Adopted Local Plan, including Policy E3 (Local Gap) are taken into account in the classification of

settlements and the extent to which objectives behind such policies will be impacted by the classification of a settlement and its associated growth that will be established through the Settlement Hierarchy.

- 4.23 We support the continued recognition that Andover is a Tier 1 settlement and therefore a focus for growth over the Plan period. We also recognise the objectives of the Spatial Strategy and Settlement Hierarchy in terms of supporting a more dispersed level of growth to support the lower tier settlements.
- 4.24 Notwithstanding this, Andover represents a strategically important settlement within the Borough and particularly within the NTV Housing Market Area and therefore it would be expected that the scale of development directed to Andover will be commensurate with its role and function.
- 4.25 **Appendix II** of the SA recognises the important function of both Andover and Romsey, in terms of their range of services and facilities, sustainable transport networks and education and employment etc. The SA, within Appendix II, suggests that by focusing developing at Andover and Romsey it may have negative consequences in terms of the ability to sustain rural services, facilities and communities.
- 4.26 It is not agreed that a direct consequence of a Spatial Strategy which focuses development at the Top Tier settlements will automatically have a detrimental / adverse effect on more rural settlements and communities.
- 4.27 Housing need requirements are a minimum and the strategic approach to housing delivery can support wider objectives in terms of sustaining rural communities. The approach to the distribution of growth requirements, via allocations and or allowances to specific tiers within the settlement hierarchy can facilitate this objective. However, if this is applied in a manner where housing figures are expressed as targets or maximum levels of development, then this may artificially constrain the achievement of sustainable patterns of development at all tiers of settlements.
- 4.28 Specific allocations, particularly at Top Tier settlements should be identified as mechanisms to achieve housing requirements and wider objectives for sustainable development. It is not clear whether the Local Plan 2040 intends to allocate sites at lower tier settlements. This may in fact be unworkable due to the sheer scale of smaller allocations and the potential for this process to undermine local aspirations to prepare Neighbourhood Plans.
- 4.29 A flexible approach based on site specific options, informed by the Settlement Hierarchy can provide a positive framework within which lower tier settlements can benefit from appropriate levels of new development, without the need for specific requirements to be identified. In doing so, focusing the delivery of site allocations to major development locations, including Andover, ensuring that strategic needs are catered for

whilst also providing opportunities for lower tier settlements to grow at a scale and pace commensurate with their classification within the Settlement Hierarchy.

- 4.30 We have no objection in principle to the Spatial Strategy Options identified and assessed through the SA. In addition, the Settlement Hierarchy can provide a framework within which future growth is distributed throughout the Borough and within the two HMAs.
- 4.31 The extent to which the hybrid Spatial Strategy supports the sustainability objectives is, in many cases, recognised as being dependent upon how development is implemented. The role and function of settlements, informed by their classification in the Settlement Hierarchy should be the starting point for the distribution of development in the next iteration of the Local Plan.
- 4.32 As explained, the classification of settlements, is based on quantitative assessments in terms of the level of services and facilities and access to such provision. There is currently now consideration as to the potential of settlements, particularly those more rural locations, to accommodate growth, without undermining other objectives in terms of protection of the environment, heritage, and landscape etc.
- 4.33 We do not agree that a focus of growth at Andover and Romsey would undermine the wider strategy to support sustainable communities at lower tier settlements. Andover has a key strategic role in the NTV HMA and we agree that this should remain a focus of growth over the plan period. However, we would have concerns if the levels of planned development at Andover were artificially curtailed based on the unjustified conclusions expressed in the SA, that growth at Andover would be at the expense of wider objectives in terms of sustainable lower tier settlements.

5. Chapter 5: Meeting our Needs

- 5.1 Chapter 5 of the Stage 1 consultation document sets out the context for future development needs within the Borough. **Paragraph 5.10** explains the 2022 Strategic Housing Market Assessment (SHMA) concludes that the housing requirement, based on the standard method, is currently 541 homes per year from 2020 onwards until the end of the Plan period (2040).
- 5.2 This results in a Borough wide housing requirement over the plan period (2020-2040) of 10,820 homes.
- 5.3 We agree with the conclusion set out at **paragraph 5.11** that there are no exceptional circumstances which may justify an alternative approach to using the local housing need standard method. As a result, it is correct and reasonable for the 2040 Local Plan to seek to meet the housing requirements established through the standard method in full.
- 5.4 Given the relatively early stage in the preparation of the 2040 it is appropriate, as set out at **paragraph 5.13**, for the final housing requirement to be kept under review, not least because the data applied in this calculation can change.
- 5.5 We do note that at **paragraph 5.12** the consultation document explains that for the purposes of the Sustainability Appraisal (SA), the Council conclude that there are no reasonable alternatives to the housing requirement.
- 5.6 The SA considers reasonable alternatives to the standard methodology and this includes whether or not a higher level of housing to meet local affordable housing is a reasonable alternative, the SA concludes that this is not the case. The reason for this is explained at **Table 13** of the SA, as being:

“The standard method for local housing need includes an uplift to aid in addressing this matter. The SHMA advises that caution needs to be taken when trying to make a direct link between affordable need and planned housing delivery figures. The output of the standard method for housing need and the outcome of the assessment of affordable housing need are not directly comparable figures. The need for affordable housing does not generally lead to a need to increase overall provision. Therefor there is no justification for this to be considered as a reasonable alternative as recommended by the SHMA.” (Table 13 Identification of Reasonable Alternatives for the Scale of Housing Need – SA, page 71-72)

- 5.7 In this context it is also noted that within the SA (**paragraph 4.41**) it states that:

“It is anticipated that the level of housing provision within the Borough is unlikely to have a significant impact on the affordability of housing. It would have a more direct impact on the availability of affordable housing...”

- 5.8 There is therefore a recognition within the SA that the level of housing provision within the Borough is likely to have a more direct impact on the availability of affordable housing, rather than have any significant impact on the overall affordability of housing.
- 5.9 With this mind, it would seem logical therefore to conclude that an increase in overall housing delivery, would have some impact on the availability of affordable homes. On that basis it is not entirely clear why it is then determined that an uplift to the housing requirement, to facilitate additional affordable housing delivery, would not be a reasonable alternative to at least be assessed the SA process.
- 5.10 The 2022 SHMA identifies affordable housing need of 437 dwellings per annum throughout the Borough and within the Andover sub-area this is calculated to be 135 dwellings per annum. **Figure 5.61** of the 2022 SHMA provides a comparison of affordable housing need between the 2022 and 2013 SHMA documents. It notes that the 2013 SHMA identified a need for 292 affordable homes per annum.
- 5.11 The 2022 SHMA does explain the differences between the respective calculations, but makes it clear that the approach in both documents broadly follow the same methodology. It then goes on to state (**paragraph 5.61**) that:
- “Regardless of any changes to the need estimate, both studies show a substantial need for additional affordable housing, and the Council should seek to provide such accommodation where opportunities arise.”*
- 5.12 It is recognised that there is no simple correlation between the overall level of housing and the future delivery of affordable housing. On this point, the 2022 SHMA (**paragraphs 5.63 to 5.76**) explains the complexities in the relationship between affordable housing need and overall housing need. For example, data related to existing households which fall into need must be considered in terms of the fact that such households already have accommodation which, if taken into account, would reduce the affordable housing need to 292 homes per year.
- 5.13 Affordable housing delivery throughout the Borough over the period 2013-2021 has been 1,982 affordable homes, which equates to c248 affordable homes delivered each year, as confirmed in the December 2021 Annual Monitoring Report.
- 5.14 Within the 2021 Annual Monitoring Report (**paragraph 10.12**) it explains that a significant proportion of affordable housing provision has been delivered as part of the Borough’s New Neighbourhood developments at East Anton, Picket Piece and Picket Twenty in Andover, as well as Abbotswood, Romsey.

- 5.15 The role of large strategic sites in achieving current levels of affordable housing delivery is therefore recognised by the Council and this should be an important consideration as proposals to accommodate the growth needs for the 2040 Local Plan are taken forward in future iterations of the Local Plan.
- 5.16 Current affordable housing delivery of 248 affordable homes per year has ensured that the Borough is meeting its current annualised requirement of 200 affordable homes per year. However, as evidenced within the 2022 SHMA, the level of need is increasing and we would urge the Council to consider, through the SA process, an uplift to identified housing needs in order to seek to maximise affordable housing delivery, by increasing the availability of affordable homes.
- 5.17 Within the 2022 SHMA it recognises that the Planning Practice Guidance (PPG) encourages local authorities to consider increasing planned housing numbers where this can help to meet identified affordable need. Specifically, the PPG states:
- “The total affordable housing need can then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the strategic plan may need to be considered where it could help deliver the required number of affordable homes.”* (Paragraph: 024 Ref ID: 2a-024-20190220)
- 5.18 We comment on the Spatial Strategy separately within these representations, but we do note that the proposed Spatial Strategy seeks to adopt a more dispersed approach than set out in the Adopted Local Plan. The reasons for this are understood, but in doing so, there is some concern that the significant role large strategic sites/new neighbourhoods have played in the delivery of Affordable Housing, as noted in the 2021 AMR, may be diluted, as smaller sites with reduced capacity for affordable housing delivery have greater emphasis in the emerging Spatial Strategy.
- 5.19 The 2022 SHMA (**para 5.76**) is clear, in that regardless of the debate surrounding the relationship between affordable housing and overall housing need, the analysis set out in the SHMA identifies a notable need for affordable housing and *“it is clear that provision of new affordable housing is an important and pressing issues in the Borough ... the evidence does suggest that affordable housing delivery should be maximised where opportunities arise.”*
- 5.20 We therefore urge the Council to consider, as a reasonable alternative, an uplift to overall housing need to maximise opportunities for affordable housing delivery and for this to form part of the SA process.

Employment

- 5.21 The Spatial Strategy Topic Paper (**paragraphs 3.13 to 3.14**) refers to the Employment, Economic and Commercial Needs Study which was prepared by *Stantec* and published in March 2021. This study provides employment projections to 2040 but is based on past trends which the Topic Paper refers to as providing a *“lumpy measures, rather than a more graduated trend”*.
- 5.22 **Paragraphs 5.55 and 5.56** of the Stage 1 consultation document notes that the study gives significant weight to recent past levels of completions, particularly the last five years and explains the challenges this approach has in terms of extrapolating such trends as the basis for requirements for the Borough. As noted at **paragraph 5.55** of the consultation document, the study concludes that the forecasts for Test Valley may not be realistic and may not be able to be accommodated.
- 5.23 It is on this basis that the Spatial Strategy Topic paper explains that the current iteration of the Local Plan 2040 does not set out any economic requirements to 2040, but confirms that existing evidence, identified through the Needs study will be tested and refined over the coming months.
- 5.24 We recognise the importance and value in having a sound evidence base, including employment provision, but we question why specific (local) figures for employment requirements are not presented within this Stage 1 consultation, or tested through the SA process. The Spatial Strategy Topic Paper (**paragraph 3.14**) is clear, in that through further work and evidence gathering to validate the findings of the 2021 study and where appropriate identify a local need figure:
- “The aim will be to seek to ensure that the proposed housing requirement, and number of jobs this would support will be aligned, whilst also providing opportunities to meet wider sub-regional economic needs”*
- 5.25 On that basis we question why, at this stage in the preparation of the 2040 Local Plan, there is not greater certainty on economic requirements for the Borough and why this is absent from the current debate on housing needs and also the distribution of such need through the Spatial Strategy.
- 5.26 The ‘alignment’ of economic needs/jobs and housing is not a simple correlation between the number of new jobs and new homes. Such alignment will have little relevance if new homes are provided for in locations which are remote and divorced from areas of employment growth, expansion or intensification.
- 5.27 Whilst it is understood that future iterations of the Local Plan 2040 may address these matters, this current consultation is seeking views on key strategic issues, such as the

overall housing need and Spatial Strategy, alongside other critical issues such as how the Local Plan responds to the declared climate change emergency.

- 5.28 The absence of specific detail on employment provision, and how this might be distributed, including the options for the distribution of identified employment needs, i.e. whether this should be achieved through expansion / intensification of existing employment areas or through the release of new land/sites, is an important consideration. In addition, how such options would accord with and support wider objectives, is a matter which warrants discussion and debate at this time, so that it can be considered alongside decisions on overall housing delivery and distribution.

Housing Requirement

- 5.29 We note the conclusions of the 2022 SHMAA and the corresponding need to deliver 10,820 homes over the Plan period and at this stage in the plan-making process, the focus of the discussion is on the strategic distribution of this identified need, based on Housing Market Areas within the Borough.
- 5.30 Within the Test Valley Borough there are distinct Housing Market Areas (HMAs) which have been reviewed through the Housing Market Area Study 2022 (HMAS). The HMAS recommends the continuation of two separate HMAs, the Northern Test Valley (NTV) area and the Southern Test Valley (STV) areas.
- 5.31 The Spatial Strategy Topic Paper explains that subject to some minor revisions, the split between the northern and southern areas is retained. Such an approach is considered to be appropriate given the distinct characteristics of the NTV and STV areas.
- 5.32 Maintaining the geographical split, based on functional HMAs, provides the framework within which the identified housing need (as identified in the 2022 SHMA) is disaggregated to the two component HMAs which make up the Test Valley Borough. The split of the identified local housing need is based on the population within each HMA.
- 5.33 **Paragraph 3.9** of the Spatial Strategy Topic Paper explains that this means 57% of the overall housing requirement will be directed to the NTV, with 43% assigned to STV.
- 5.34 **Table 5.2** of the Stage 1 consultation sets out the proposed split of the housing requirement (10,820) to the two HMAs within the Borough, as follows.

	% split	Homes per annum	Total Homes 2020-2040
Borough wide	100%	541	10,820
Southern Test Valley HMA	43%	233	4,653
Northern Test Valley	57%	308	6,167

- 5.35 As a matter of principle, we support the overarching approach which is based on a split of the identified housing needs which reflects the distinct HMAs within the Borough. Subject to some minor revisions to the physical extent of these HMAs, they remain consistent with the established approach set out in the Adopted Local Plan.
- 5.36 Notwithstanding this, and as explained in the Sustainability Appraisal (**paragraph 10.11**), this split is premised on a demographic basis only. It is not based on any consideration of the role and function of settlements within each HMA, both in terms of their capacity to accommodate additional growth for both housing and employment.
- 5.37 It does not take into account any considerations of how individual settlements can contribute to wider objectives of the plan, such as supporting sustainable patterns of development in the context of climate change aspirations, and in terms of access to services, facilities, education and employment etc. Moreover, this split does not consider any matters related to specific issues such as affordability, regeneration or infrastructure requirements within settlements.
- 5.38 **Paragraph 10.12** of the Sustainability Appraisal explains that additional work will be undertaken at the Regulation 18 Stage 2 in relation to the distribution of development, including housing need, which may include additional approaches to distributing housing need within the HMAs.
- 5.39 We have some concerns with this approach as the Stage 2 Local Plan will include draft site allocations which will be determined by the Spatial Strategy and associated split of needs between the two HMAs. Therefore, there is concern that the precise split of housing between the HMAs has in effect, been pre-determined and options for alternative approaches based the two HMAs will be overtaken by a shift in focus to specific site options.
- 5.40 **Strategic Policy 6 (Housing Provision)** presents the split of the housing requirement between the two HMAs as *fait accompli* which is inconsistent with the position set out in the SA (as referenced previously) that additional work still needs to be undertaken.
- 5.41 It is therefore imperative that the Stage 2 Local Plan presents site options alongside the consideration of alternative options for the approach to the distribution of housing (and employment) needs between the two HMAs.

- 5.42 We support the distinction, in policy, between the two HMAs but our concern at this time is that the reliance on demographic data as the basis for the split, fails to consider the role and function of settlements within the HMAs and how such settlements can provide for development in accordance with objectives of the Local Plan 2040.
- 5.43 The main concern is that the housing requirements for each HMA at this stage will be determinative in the consideration of site options and the extent to which settlements, including the top tier settlement of Andover will be expected to accommodate growth. The approach at this time may constrain the delivery of sustainable site options, on the basis of a figure which is only derived from demographic data for the individual HMAs.

Housing Land Supply

- 5.44 It is understood that for the purposes of housing land supply calculations, the current approach of basing calculations on the separate HMAs will be retained. There is no objection to this as a matter of principle and the assumption is that the requirements are not transferable between the respective HMAs.
- 5.45 We note that at **paragraph 5.25** of the Stage 1 consultation document it explains that the Council will consider whether there is a need to allocate for a higher number of homes above the minimum requirement to provide for greater resilience in housing land supply delivery.
- 5.46 We would support such an approach as this provides greater confidence in supply throughout the plan period and would recognise that the identified housing needs are a minimum requirement.
- 5.47 The achievement of a rolling five year housing land supply should not be considered as a cap which can not be breached. Entrenching this added resilience in supply as part of the approach to allocations is supported.
- 5.48 This can be achieved by actively seeking to allocate in excess of the identified housing needs, but also by ensuring that any site-specific policy incorporates flexibility in terms of the overall number of new homes expected to be provided, i.e. by not referencing specific quantum of development as a target or maximum, instead, referring to 'at least' or 'around.'