



HIGHWOOD

TEST VALLEY BOROUGH DRAFT LOCAL PLAN 2040

REGULATION 18 (STAGE 1) CONSULTATION

FEBRUARY 2022



CONSULTATION RESPONSE

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1.0 INTRODUCTION

- 1.1 This representation is submitted by Highwood Group in response to the Test Valley Borough Council (TVBC) Draft Local Plan 2040 Regulation 18 Stage 1 consultation.
- 1.2 This representation follows previous representations made as part of the Issues and Options and Refined Issues and Options consultation held in 2018 and 2020 respectively.
- 1.3 We thank TVBC for providing the opportunity to comment on this latest version of the plan. This representation begins by considering the needs of the Borough, focusing on Chapter 5 of the Consultation document, before commenting on the spatial strategy and how those needs could be sustainably met, with a focus on Chapters 3 and 4 of the consultation document.

2.0 MEETING TEST VALLEY'S HOUSING NEEDS

- 2.1 The use of the Standard Method (as required by the NPPF) to calculate housing need and the commitment at paragraph 5.13 to meet the need derived from the Standard Method is supported.
- 2.2 We also agree that the Standard Method calculation needs to be regularly reviewed based on the latest information (for example updated affordability data).
- 2.3 However, it is disappointing that the Draft Plan goes on to claim there are no 'exceptional circumstances' to justify a higher housing requirement and hence no need to plan for a higher number of homes.
- 2.4 There are several compelling reasons why TVBC should be ambitious and plan for a higher number of homes.
- 2.5 Our first contention is that the application of an 'exceptional circumstances' test to the decision not to seek a higher number of homes is misplaced, particularly in relation to unmet need of neighbouring authorities.
- 2.6 The PPG is clear that the Standard Method 'provides a minimum starting point in determining the number of homes needed in an area [our emphasis]' which the draft plan recognises. In respect of unmet need, paragraph 61 of the NPPF is also clear that 'In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. [our emphasis]'.
- 2.7 As this section will show, there are compelling reasons why TVBC should be proactively and ambitiously planning for higher housing growth to help tackle the worsening issues of affordability and help meet the established unmet need within the wider south Hampshire sub-region of which Test Valley is a part.

UNMET NEEDS

- 2.8** Firstly, it is contended that TVBC should be helping meet some of the unmet need of the wider sub region, particularly the South Hampshire region which has an established unmet need overall approaching 13,000 homes.¹ Furthermore, neighbouring Southampton City Council are predicted to have a shortfall of 7,345 homes against their forecast requirement (as set by the Standard Method). Test valley, whilst being located only partly in the sub-region, still has an opportunity to help meet some of this need within their considerably less constrained boundaries.
- 2.9** Councils have a Duty to Cooperate with each other on strategic issues, including housing issues, across administrative boundaries. It is not clear what discussions have to date taken place between TVBC and neighbouring authorities about meeting unmet need. The Strategic Housing Market Assessment (SHMA) completed in January 2022 confirms at paragraph 3.18 that it gave no consideration to unmet need of neighbouring authorities despite the significant and acknowledged unmet as described above.
- 2.10** Test Valley is considerably less constrained than neighbouring authorities and contains a number of settlements, including Romsey, which are highly sustainable and could help meet the unmet needs of Southampton and the wider South Hampshire Region.
- 2.11** TVBC has a significant opportunity to help meet as yet unmet needs within their boundaries within the STV HMA.
- 2.12** The NPPF is clear that local authorities should work with their neighbours to explore how unmet need can be met. It is clear that ‘any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for (NPPF Para. 61).’
- 2.13** There is no evidence that this proactive engagement has yet occurred to discuss how TVBC can meet unmet need and it is concerning that such a reasonable alternative has not been explored as part of the SHMA, the Sustainability Appraisal (SA) or considered as an option within the Draft Plan.

- 2.14** TVBC should not wait for a ‘request’ to meet unmet need from other local authorities given the level of unmet in the area is already well understood and acknowledged by TVBC, but instead should be proactively planning to meet the already identified shortfall. Failure to do this will undermine the soundness of the plan.
- 2.15** Therefore, it is recommended that Test Valley proactively explore with their neighbours how TVBC can help meet the unmet needs of the area. Failure to do so risks further embedding the shortage of housing in the area, reducing the affordability of housing both in Test Valley and regionally.

AFFORDABILITY

- 2.16** It is commonly acknowledged that housing affordability in the south-east region is worsening, and this includes Test Valley where the latest house price to earnings data shows for the district as a whole house prices are on average 10.6 times average earnings – the highest in the Borough to date – and up from a ratio of 4.93 in 1997.
- 2.17** A review of house price data (April 2022) suggests average values in Romsey of £502,533, compared to the district median house price of £315,000 quoted in the SHMA indicating a particular issue with affordability in Romsey.

¹ PfSH Statement of Common Ground (SoCG) 2021 – Revision and Update (25/10/21). TVBC are a member of PfSH and a Signatory to the SoCG.

3.0 THE SPATIAL STRATEGY AND SETTLEMENT HIERARCHY

SPATIAL STRATEGY

3.1 Highwood strongly support the Council’s confirmation that they will be pursuing a strategy that includes directing development to areas including Romsey, employment centres, and supporting the more sustainable rural settlements. We support the SA conclusion that options C, D and E best achieves the Sustainability Objectives and hence should be the option of focus for the spatial strategy.

3.2 We support acknowledgement at para 3.1 of the plan that the market towns of Andover and Romsey as the largest settlements in the Borough, with the widest range and number of facilities, will be at the core of the spatial strategy and will continue to be a focus for development. And that this will need to include a need to look at greenfield sites at these settlements with the scale of such to be considered through pending site assessment work.

3.3 We support the reference in the ‘Test Valley Sustainable Spatial Strategy’ on p.29, to Romsey,

Being a key focus for sustainable growth along with supporting infrastructure which is integrated with the town

3.4 We also support the commitment to,

Maintaining and enhancing the roles of our larger urban and rural settlements through accommodating development that meets the needs of local communities and supports existing accessible facilities.

SETTLEMENT HIERARCHY

3.5 Highwood support the identification of Romsey within the “Spatial Strategy Policy 1 (SSP1): Settlement Hierarchy” on p.33 as a Tier 1 settlement.

3.6 As set out in our previously made representations, development at Jermyns Lane Romsey proposed by Highwood provides an opportunity to realise the aspirations set out in Chapter 3 of the draft plan in combination with town centre regeneration.

4.0 CONCLUSION

- 4.1 Highwood have welcomed the opportunity to participate in the TVBC Draft Local Plan 2040 Regulation 18 (Stage 1) consultation.
- 4.2 For the seasons set out in section two, the plan should proactively consider how TVBC can help meet the already identified unmet need in the South Hampshire region and in Southampton. There is no evidence to date that proactive engagement to help meet unmet need has occurred. Planning strategically across boundaries to meet housing need is clearly advocated in the NPPF and failure to do so risks undermining the soundness of the plan.
- 4.3 We support the focus on Romsey as the largest settlement with the widest range and number of facilities within STV to which most development is to be directed. We also support the acknowledgement contained in the Plan that alongside town centre regeneration, there will be a need to look at greenfield sites to deliver the much-needed housing, particularly affordable housing for the borough.
- 4.4 Amplifying the case made in previous representations, land at Jermyn's Lane, Romsey has the potential to assist the council in realizing their plan aspirations and we look forward to exploring the opportunities with TVBC and the local community in the coming months.



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