

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

31<sup>st</sup> March 2022

Dear Sir / Madam

**Re: Test Valley Draft Local Plan 2040  
Representations on behalf of Mrs Powell**

Woolley & Wallis are instructed by Mrs Powell to submit representations in response to the Local Plan 2040 consultation. Comments submitted on behalf of our client predominantly relate to the proposed strategy for the rural areas of Test Valley, particularly the positive and sustainable contribution rural settlements, such as Over Wallop can make to housing delivery over the plan period to 2040.

Land controlled by our client comprises two agricultural fields which extend to 2.45 hectares in area and are located within the heart of the village and are surrounded by residential development within the settlement boundary for Over Wallop. We have recently submitted the site through the Council's SHEELA and as such it does not currently have a SHEELA reference number.

Paragraphs 78 and 79 of the National Planning Policy Framework (NPPF) deal specifically with rural housing. Paragraph 75 states:

*"To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of small settlements, development in one village may support services in a village nearby".*

Paragraphs 5.33 to 5.36 of the consultation draft Local Plan deal specifically with rural housing. Paragraph 5.33 refers to Policy COM8 of the current adopted Local Plan which allows for Rural Exception Sites advising that this Policy will be reviewed as part of the Regulation 18, Stage 2.

Paragraph 5.34 refers to Central Governments new tenure of affordable low-cost home ownership known as First Homes and advises that the Council will consider the inclusion of a policy on First Home Exception Sites.

Community led development is also referred to as currently allowed for through adopted Local Plan Policy COM9 as well as through Neighbourhood Plans and advises that as part of Regulation 18 Stage 2 the Council will consider the role which community led development can play in meeting future housing need taking account of the spatial strategy, settlement hierarchy and housing distribution.

Paragraph 5.36 states that as part of the Regulation 18 Stage 2 the Council will consider a review of the specific policies for rural housing including those for rural workers and replacement dwellings.

We support the review of specific policies for rural housing as part of the Regulation 18 Stage 2, however consider this needs to go further than simply looking at Rural Exception Sites, First Home Exception Sites, community led development, rural workers and replacement dwellings.

The Vision for Test Valley (paragraph 2.21 of the draft Local Plan) states that by 2040 Test Valley Borough’s communities will be prosperous and resilient which will be delivered through various ways, including through smaller local centres (i.e. outside Andover and Romsey) providing for the needs and aspirations of residents and visitors. The Vision continues to state that *“the vibrancy of our rural communities will have been retained through sustaining access to facilities and services they need to support healthy, active lifestyles and wellbeing and enjoy access to our diverse and outstanding countryside”*.

Under the ‘Our Communities’ objective (at paragraph 2.30) the consultation draft plan states that the Local Plan 2040 will identify the location of new development and the resultant increase in population will help to sustain the vibrancy of rural communities through helping to keep existing facilities and services to meet daily needs. At paragraph 3.9 (under the heading ‘Spatial Options’) it is highlighted that enabling growth at the Borough’s larger number of settlements including at rural communities was supported through responses received to the Refined Issues and Options.

Paragraph 3.12 continues to state that to support and sustain vibrant and healthy communities, the spatial strategy identifies a wider distribution of development than set out in the current Local Plan. It is acknowledged that much of the Borough is rural with some villages meeting immediate needs. The proposed strategy is explained as supporting these rural settlements to develop in a sustainable manner and as helping to overcome challenges faced in terms of housing supply and affordability. Paragraph 3.13 recognises that the strategy aligns with national policy in recognising developments, in particular housing, can support opportunities for villages to grow and thrive. This is acknowledged as being able to improve the broader sustainability of rural communities along with providing benefits in sustaining and enhancing facilities and infrastructure and potentially attracting new ones. Paragraph 3.15 states that for the smaller settlements in the rural area, the spatial strategy identifies that development will be enabled where it supports their role.

Proposed Spatial Strategy Policy 1 sets out a Settlement Hierarchy for the Borough which identifies Over Wallop (together with Middle Wallop and Nether Wallop) as a Tier 3 Settlement. A Tier 3 settlement is one which has all 6 defined key facilities and a good level of public transport. We support the identification of Over Wallop as a Tier 3 settlement.

We also support the identification of locations for new development through the Local Plan, particularly in rural areas. Paragraph 5.27 of the consultation draft plan states that the need for housing requirement figures for designated neighbourhood plan areas will be considered. In accordance with NPPF paragraph 66 strategic policies within the emerging Local Plan should set out a housing requirement for designated neighbourhood areas (not simply consider the potential for such an approach) which reflects the overall strategy for the pattern and scale of development and any relevant allocations. The NPPG (National Planning Practice Guidance) advises that while there is no method for setting such figures it should take into account the characteristics of a neighbourhood area, including its population and role in providing services.

A total of 18 Neighbourhood Plan areas have been designated in the Test Valley Borough with 16 of these relating to rural Parishes. A review of the Neighbourhood Plans (as Made or in Draft) has been undertaken with a view to identifying the number of Plans that seek to allocate specific sites for housing development, with a summary provided below:

<b>Neighbourhood Plan Area</b>	<b>Preparation Status</b>	<b>Approach to Housing Allocations</b>
Over Wallop	Under preparation	No housing allocations
Michelmersh and Timsbury	Under preparation	Unknown
Amport	Designated	Unknown
Nether Wallop	Under preparation	No housing allocations
Thrupton	Plan Made July 2020	No housing allocations

Longstock	Under preparation	No housing allocations
Upper Clatford	Plan made December 2020	No housing allocations
Awbridge	Designated	Unknown
Charlton	Plan made March 2021	Site allocated for 50 dwellings
Chilbolton	Plan made May 2021	No housing allocations
Goodworth Clatford	Plan made January 2019	No housing allocation
Houghton	Plan awaiting referendum	No housing allocation
King's Somborne	Under preparation	Unknown
Sherfield English	Under preparation	Unknown
Wellow	Under preparation	Considering the allocation of sites
West Dean and West Tytherley	Plan made in March 2022	No housing allocations

It is evident from the summary table above that only one Neighbourhood Plan has been made identifying site(s) for housing with another Plan under preparation that is considering the allocation of sites. The remaining Neighbourhood Plans either take a restrictive approach to housing delivery or seek to restrict development to within the existing identified settlement boundaries.

Land controlled by our client lies within Over Wallop which has an approved Neighbourhood Plan designation. The Neighbourhood Plan is at an advanced stage and makes no provision for new housing development outside of the existing settlement boundary despite the draft Local Plan identifying it as a Tier 3 settlement.

As set out above, in accordance with paragraph 66 of the NPPF we consider that the Local Plan should set out a housing requirement for Neighbourhood Plan areas to ensure that the housing needs of rural areas are met in the forthcoming Plan Period. It is acknowledged that for some Parishes / Villages they may be able to accommodate this requirement within the settlement boundaries, however such identification will provide more certainty around the delivery of housing in rural areas.

Without the identification of a housing requirement figure for Neighbourhood Plan areas or the allocation of sites in rural areas the Local Plan will place an over reliance on strategic allocations at the urban areas of Andover and Romsey. Whilst we do not object to the focus of development at the main towns of Andover and Romsey followed by the Tier 2 settlements, it should be recognised that an over reliance of a small number of large sites can lead to delayed delivery. Paragraph 69 of the NPPF recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly.

Increasing the range of site options will also help to provide greater flexibility in the delivery of homes throughout the plan period and provide the Council with greater certainty in terms of maintaining a sufficient supply of deliverable housing sites to meet the five year land supply obligations.

Whilst the identification of housing requirement figures for Neighbourhood Plan Areas can assist the delivery of housing in rural areas it is only a precursor to delivery and there can be no obligation or requirement for a Neighbourhood Plan area to prepare a Neighbourhood Plan or for the community to approve it. The Draft Plan should therefore also make provision for sustainable sites coming forward in rural areas, particularly in the more sustainable Tier 3 settlements, where a Neighbourhood Plan is not being progressed or where such a Plan is made but does not identify site(s) capable of accommodating the identified need for the area.

### Summary and Conclusions

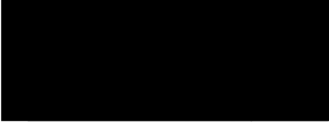
We support the identification of locations for development in the emerging Local Plan, however the Plan should go further and set out a housing requirement figure for Neighbourhood Plan areas together with making provisions for the delivery of sustainable sites where Neighbourhood Plans do not come forward or they do not make adequate provision for new housing.

Without making provision for new housing in rural areas the plan will not deliver on its Vision to deliver vibrant rural communities, including through sustaining access to facilities and services. The identification of a

range of sites will also provide greater flexibility in the delivery of homes providing the Council with greater certainty in terms of maintaining a sufficient supply of deliverable housing sites to meet the five year land supply obligations.

We trust that our comments will be duly considered and should you have any questions on the information set out within our representation then please do contact Kerry Pflieger directly on 07769976707.

Yours faithfully



**Woolley & Wallis**