

Planning Policy & Economic Development Service
Test Valley Borough Council
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Ref: Local Plan

Date: 28.03.2022

FAO Mr Graham Smith, Head of Planning Policy &
Economic Development

Dear Mr Graham Smith

Re: Test Valley Local Plan

Abri is pleased to submit representations on the draft Local Plan published in February 2022. As one of the largest housing providers based in the south of England we are working to deliver more homes for those in need, in communities where everybody has the opportunity to belong, grow and thrive.

We own 35,000 homes and work on behalf of 80,000 customers and we are looking to do more. We have secured a strategic partnership grant allocation of £250m to deliver 3,218 homes, increasing delivery by 2,500, 25% above our ambition to deliver 10,000 homes by 2030. Abri is a long-standing landlord and developer in Test Valley, as Radian, and delivering more high quality, sustainable housing in the borough is part of our ambitious delivery strategy. Our comments focus on those areas of the draft Local Plan affecting the deliverability of housing.

Chapter 3: Spatial Strategy

Shelter has described the current situation as a housing emergency, drawing attention to the over 17.5 million people impacted by overcrowded, dangerous, unstable or unaffordable housing across England. This situation affects all local planning authorities, placing more pressure on the planning system to deliver not just across local plan periods, but now, as the 17.5 million affected households face increasing poverty or destitution without early remedy.

Local plans are a key component in resolving housing inequalities, encouraging more housing in the right places with enough rigour and flexibility to accommodate need where it arises. The objectives set out in this consultation draft plan rightly recognise that Test Valley residents need a range of homes, fit for purpose and designed to meet the needs and aspirations of different groups in the community. These important objectives should be tied into the spatial strategy more specifically, ensuring the driving need to deliver on affordable housing needs permeates the plan and can be properly measured.

To provide a more focused and meaningful spatial strategy, this aspect of the emerging local plan could be rephrased as overleaf:

*“Maintaining and enhancing the roles of our larger urban and rural settlements through accommodating development that meets the **varying** needs of local communities, **including for affordable housing**, and supports existing accessible facilities.”*

The focus on the main urban areas of Romsey and Andover is properly supported by a flexible approach to delivering housing at the other urban and rural settlements. It is also encouraging that the Settlement Hierarchy Assessment paper reflects on the NPPF recognition that development in rural areas can better support existing local services, including where there are groups of settlements.

As with our comments above, we support this approach being flexibly embedded in the development of the new policies to ensure all sustainable settlements, or groups of settlements, with needs for affordable housing are properly supported to meet those needs in partnership with providers including Abri. To facilitate a flexible approach any housing growth figures should be set as minima, recognising that needs will change over time with any housing need survey results representing a snapshot in time.

Chapter 4: Strategic Policy Framework

The emerging themes of Strategic Policy 1 align with Abri’s own ambitions to deliver a net zero carbon future. While the Council notes that full viability work will be undertaken in support of the plan to ensure that tackling the climate and ecological challenges, we ask that this work is undertaken in full consultation with local developers, including housebuilders of all scales to ensure the plan’s emerging policies are deliverable without damaging the level of affordable housing that can be delivered.

Strategic Policy 4: Town Centres

The intention to require developers to produce design statements for development proposals in the town centres of Andover and Romsey is in principle supported. Being mindful of the intentions of the NPPF to support town centres and significantly boost the supply of homes, point b of this draft strategic policy should not be used to stymie the delivery of developments, where design guides and development briefs to be produced by the Council are not yet produced or at the early stages of development. This will ensure that development can be determined on its own merits, support continued growth and diversification of retail areas and ensure officer time can be focused where most needed.

Strategic Policy 6: Housing Need

The intention to plan for and meet the local housing need figure in full through this local plan period is supported. As the SHMA has recognised a higher need for affordable housing than the adopted local plan, the identification of a target figure for affordable housing delivery as part of the policy would be a useful tool to drive supply over the plan, as well as enabling more focused monitoring.

It is appropriate that the Council introduce a policy on First Homes. It would be useful to have targeted discussions with developers, including Registered Providers, as part of the development of this policy to ensure this delivers on the national policy ambitions whilst ensuring a continued focus on meeting needs for social and affordable rented homes, and other forms of affordable home ownership.

The policy on rural exception sites should be updated to explicitly allow for cross-subsidy with market housing to ensure such sites can be delivered to meet the housing needs in those areas that would not otherwise benefit from new housing.

Please do not hesitate to contact me if further discussion would be helpful. I would be grateful if Abri is retained on your contact database for future consultations.

Yours faithfully,

Mrs Meghan Rossiter MRTPI
Planning Manager
Abri Group

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