

**Place Development****Acting Assistant Director:** Tim GuymerSent by email to: [planningpolicy@testvalley.gov.uk](mailto:planningpolicy@testvalley.gov.uk)My Ref:  
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Date: 02 April 2024

Dear Planning Policy Team

**NEW FOREST DISTRICT COUNCIL RESPONSE TO THE TEST VALLEY BOROUGH COUNCIL DRAFT LOCAL PLAN 2040 REGULATION 18 STAGE 2 CONSULTATION**

Thank you for the opportunity to respond to the Test Valley Borough Council Draft Local Plan 2040 Regulation 18 Stage 2 Consultation (hereafter referred to as the 'draft Local Plan').

Please find below an officer response on behalf of New Forest District Council (NFDC) covering the following key cross-boundary strategic matters:

- Housing need and provision
- Employment development in the M271 corridor
- Mitigation of recreational impacts of development on the New Forest international nature conservation designations

**Housing need and provision**

As set out in the draft Local Plan, the housing need for Test Valley Borough Council as calculated by the Government's standard method is currently 550 dwellings per annum. NFDC notes that the draft Local Plan proposes a housing target of 550 dwellings per annum, apportioned into 237 dwellings per annum in Southern Test Valley and 313 dwellings per annum in Northern Test Valley.

Paragraphs 3.61 of the draft Local Plan acknowledge that a Spatial Position Statement has been produced (December 2023) by the Partnership for South Hampshire (PfSH) setting out the current level of housing need and supply in South Hampshire which identifies a current supply shortfall in meeting housing needs across South Hampshire. Paragraph 3.62 of the draft Local Plan goes on to explain that *"national policy is clear where unmet housing exists, neighbouring authorities need to help provide for these housing needs. This is a challenging position for the Council as we recognise the increasing pressure from our neighbouring authorities in Southern Test Valley, but individual Local Plans need to progress with evidencing the level of unmet housing need they may have. As this has not been produced yet by the relevant neighbouring authorities, we are unable to consider this at this time."*

Test Valley Borough Council will be aware that the December 2023 published PfSH Spatial Position Statement indicates a significant current housing supply shortfall in the PfSH area of

circa. 11,770 dwellings, of which there is a housing supply shortfall for NFDC against the standard method of circa. 5,650 dwellings in the period to 2036. It is in this context that NFDC has recently commenced a full Local Plan Review. At this stage of preparation, the extent to which the Local Plan Review will be able to meet future housing needs is not clear, particularly when considering the need for any such Plan to cover a minimum 15-year period from its adoption.

NFDC acknowledges that, at this time, unmet need arising from the South Hampshire area has not yet been fully quantified and recognises the difficulty for Test Valley Borough Council in considering this fully in its Local Plan at the present time. In this context, NFDC welcomes paragraph 3.63 of the draft Local Plan which states that *“Test Valley Borough Council is committed to undertaking a future review of the Local Plan 2040 which can address this if needed.”* However, NFDC considers that this commitment should be strengthened and elevated to policy status either within draft Spatial Strategy Policy 3: Housing Requirement or draft Spatial Strategy Policy 9: Delivery, Monitoring and Contingency. Such an amended policy should require Test Valley Borough Council to specifically consider the need to commence a review of its Local Plan where a quantified unmet need has been established in a recently adopted local plan in a neighbouring local authority area. This will ensure that appropriate mechanisms are provided for within the Local Plan to enable Test Valley Borough Council to respond positively to considering how unmet needs from neighbouring authorities should be addressed.

### **Employment development in the M271 corridor**

The Test Valley Borough Council draft Local Plan designates the land on both the western and eastern side of the M271 corridor into Southampton as existing Strategic Employment Sites. Draft Policy EC01: Retention of Employment Land and Strategic Employment Sites states that strategic employment sites will be prioritised for employment uses. In the case of the designated Strategic Employment Site east of the M271 at Adanac Park, draft Southern Area Policy 14 states that development for office/research/manufacturing Class E(g) and exceptionally support facilities at Adanac Park, Nursling will be permitted. In the case of the designated Strategic Employment Site west of the M271 at Nursling Estate, draft Southern Area Policy 15 states that the use of land and buildings will be restricted to storage and distribution uses (Class B8) and ancillary processing and assembly within Class E(g).

Test Valley Borough Council will be aware of the increasing strategic importance of the M271 corridor in relation to the Solent Freeport and future port related development in the region. NFDC therefore considers that any future employment redevelopment or development on land within the M271 corridor (particularly on the western side) should consider further whether there is a need for this to be prioritised for appropriate port and port-related uses in order to support the function of this internationally important port with associated economic benefits and reduce the extent of the need to utilise greenfield land in more environmentally sensitive locations.

### **Mitigation of recreational impacts of development on the New Forest international nature conservation designations**

The Habitat Regulations Assessment supporting the draft Local Plan correctly screens in recreational pressure as a likely significant effect of development proposed within the recreational catchment area of 13.8km from the New Forest international nature conservation sites (up to 15km for larger scale developments). NFDC supports the provisions made within draft Policy BIO2: International Nature Conservation Designations which requires development that is likely to have a significant recreational effect, either alone or in-combination, on the New Forest international nature conservation designations to clearly demonstrate that any potential adverse effects on the integrity of such designations are fully mitigated. NFDC welcomes the co-

operative working that has taken place to date on a co-ordinated strategic approach to mitigation for recreational impacts on the New Forest and looks forward to further joint working on this strategic matter.

Yours faithfully

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**Tim Guymer**

Acting Assistant Director – Place Development  
New Forest District Council

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