



Test Valley Borough Council Local Plan 2024

Regulation 18 Stage 2 Consultation

April 2024



Page intentionally left blank

CONTENTS

1	Introduction.....	2
1.1	Context.....	2
2	Draft Test Valley Local Plan 2040	4
2.1	Background.....	4
2.2	Chapter 2: Vision, Key Challenges and Objectives	4
2.3	Chapter 3: Spatial Strategy	7
2.4	Chapter 4: Test Valley Communities.....	18
2.5	Chapter 5: Theme Based Policies.....	25
3	Site Submissions	32
3.1	Introduction.....	32
4	Conclusions.....	34
4.1	Summary.....	34

1 INTRODUCTION

1.1 Context

1.1.1 Gladman Developments Ltd. (Gladman) welcome the opportunity to comment on the Test Valley Borough Council Local Plan 2024 Regulation 18 Stage 2 Consultation and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public. Gladman has been involved throughout the plan preparation process of the emerging Local Plan 2040, having previously submitted representations on the Stage 1 consultation in April 2022.

1.1.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The NPPF requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

1.1.2 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.

- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.1.3 Gladman Developments have three land interests in Test Valley which are being promoted through the emerging Local Plan: Land at Halterworth Lane, Romsey, land at Flexford Road, Valley Road, and land of Romsey Road, West Wellow.

1.1.4 The sites are available, suitable, and deliverable for housing as summarised in Section 3 of this representation and the accompanying StoryMap. Gladman looks forward to engaging further with the Council as the plan preparation process progresses.

2 DRAFT TEST VALLEY LOCAL PLAN 2040

2.1 Background

- 2.1.1 The Local Development Scheme states that the Plan is proposed to be adopted in Q2 of 2026. As this will result in the plan looking forward for fewer than fifteen years, it is currently inconsistent with paragraph 22 of the NPPF which requires local plans to look ahead from a minimum of 15 years from adoption. Gladman contend that the plan period must be extended to be consistent with national policy.
- 2.1.2 Gladman would also contend that the start date for the plan need not be 2020/2021, but rather should start at 2023 in line with the most up to date affordability ratio relating to incomes and house prices. It is also unnecessary for a local plan to consider the delivery in the first three years of the plan period, as this will have little to do with the remaining plan period and the required development needs looking forward. Therefore, Gladman's recommended plan period would be 2023/24- 2040/41.
- 2.1.3 The sections that follow below include specific comments from Gladman on the Council's preferred options covering a range of the policies and topics that have been posed, but with a specific focus on the housing requirement, spatial strategy and Sustainability Appraisal.

2.2 Chapter 2: Vision, Key Challenges and Objectives

National Planning Policy and Guidance

- 2.2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The NPPF requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

2.2.2 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2.2.3 The NPPF reaffirms the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social, and environmental priorities and to help shape the development of local communities for future generations.

Regional Context and Duty to Cooperate

2.2.4 The Duty to Cooperate requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation.

2.2.5 The revised Framework and LURA introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. Planning guidance sets out that local planning authorities should produce, maintain,

and update one or more Statement(s) of Common Ground (SoCG), throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.

- 2.2.6 Whilst recognising the strong record of ongoing collaboration between the Partnership for South Hampshire (PfSH), outcomes of work around the distribution of unmet needs arising from the PfSH area remain incomplete and should be addressed as a matter of priority.
- 2.2.7 At present, the unmet needs for the PfSH area is estimated to be in the region of 11,700 homes, based on the current methodology as set out in the latest position statement, compared to the previous figure of 13,000 dwellings set out in the 2020 SoCG. There are significant shortfalls in the New Forest and Eastleigh both of which border Test Valley. Together shortfalls in these two areas amount to well over 8,000 homes between 2023 and 2036. In particular the constraints faced by New Forest due to the National Park will require neighbouring authorities such as Test Valley to identify further land to help meet these needs.
- 2.2.8 Gladman also note that Table 1 of the PfSH Position Statement states that the unmet needs of Southampton are zero. While Gladman recognise that the shortfall results from the 35% uplift which should be accommodated where it applies, it is still possible to meet the needs in locations that are adjacent to Southampton and Test Valley should be prepared to consider this.

¹ PPG Reference ID: 61-001-20180913

2.2.9 It is vital to the soundness of the Local Plan Review that collaboration between the PfSH authorities continues and an effective strategy is set in place which positively deals with unmet needs of the PfSH area.

2.2.10 Since the need to demonstrate effective cooperation is an ongoing issue, Gladman reserve the right to provide further comments in relation to this matter once further evidence becomes available.

Vision

2.2.11 Gladman support the proposed vision which seeks to provide access to good quality homes to meet a range of needs and aspirations as well as delivering well designed developments to a high standard that encourage inclusivity, health, and security. In addition, Gladman support the proactive approach to ensuring the borough's economy will be thriving and which seeks to ensure growth across a range of sectors, including the high technology, green industries, and the visitor economy.

Objectives and Challenges

2.2.12 In principle, Gladman support the proposed plan objectives particularly in relation to the housing objective which seeks to provide a range of homes that are fit for purpose and designed to meet the needs and aspirations of different groups within local communities.

2.2.13 In addition, we support the transport objective which seeks to encourage active and sustainable modes of transport and ensuring new development facilitates improvements to accessibility, safety, and connectivity in transport infrastructure in order to reduce the impact of travel by private car.

2.3 Chapter 3: Spatial Strategy

Spatial Strategy Policy 1 (SS1): Settlement Hierarchy

2.3.1 Gladman were previously supportive of the proposed settlement hierarchy in the first stage of regulation 19 consultation which identified Andover and Romsey as Tier 1 settlements. Further, Valley Park and Wellow were identified as a Tier 2 settlements.

- 2.3.2 The previous settlement hierarchy differed from that contained in the adopted Local Plan through the removal of key service centres and elevated Wellow's status from a Tier 3 to Tier 2 settlement. The recognition of Wellow as a sustainable settlement capable of accommodating sustainable growth opportunities was therefore supported.
- 2.3.3 However, Wellow is now considered a Tier 3 settlement to reflect the changes in methodology regarding more rural settlements which has resulted in previously Tier 2 settlements becoming Tier 3, largely relating to an announcement regarding reduction in bus services and the uncertainty in this approach.
- 2.3.4 Gladman disagree with the removal of bus services from the methodology. The supporting text states 'the sustainability of settlements is based on a snapshot in time of services and facilities', and yet the settlements are not being assessed on the sustainable transport services that are available at this moment in time.
- 2.3.5 It also fails to recognise that increased growth results in increased demand, which will help to mitigate the reduction of bus services in the future. As such, in the absence of robust evidence to support the change in methodology, Gladman consider that Wellow should be reconsidered as a Tier 2 settlement to reflect the current level of sustainability and facilitate the growth required to ensure the continued vitality and viability of the settlement.

Spatial Strategy Policy 2 (SS2): Development in the Countryside

- 2.3.6 Gladman disagree with the use of settlement boundaries to arbitrarily restrict otherwise sustainable development from coming forward. Rather, Gladman contend that a criteria based policy that allows sustainable development beyond the settlement boundaries can come forward in the event of a drop in housing land supply or changes in the local or national political context.

Spatial Strategy Policy 3 (SS3): Housing Requirement

- 2.3.7 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.
- 2.3.8 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs assessment defined using the standard method, unless there are exceptional circumstances to justify an alternative approach.
- 2.3.9 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. Annex 2 of the Framework (2023) defines the terms "deliverable" and "developable".
- 2.3.10 Once a local planning authority has identified its housing needs, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development. Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full.
- 2.3.11 The Council has prepared a Strategic Housing Market Assessment (SHMA) and a Housing Market Area Study (HMAS). The SHMA (2022) sets out the Council's approach to its local housing need assessment and concludes that using the Standard Method results in a local housing need figure of 550 homes per annum from 2020 onwards i.e. 11,000 dwellings over the period 2020 to 2040.

- 2.3.12 The Council is proposing to continue its approach to split the housing requirement between the Northern Test Valley Housing Market Area and Southern Test Valley Housing Market Area to provide 6,270 dwellings and 4,730 dwellings respectively.
- 2.3.13 Gladman object to such an approach which does not draw support from national policy, which in itself does not disaggregate housing needs within an authority. If this were to be a reflection of where unmet housing needs from adjoining authorities were to be supported this would make sense, but as the Councils proposed contribution to neighbouring authorities identified unmet housing needs is nil, this approach makes little sense.
- 2.3.14 Whilst Gladman are supportive of the approach using the Standard Method to identify its housing needs, Gladman remind the Council that the housing figure identified using the Standard Method only identifies the baseline housing needs derived utilising a three-step process defined in the PPG, and as such, only represents the starting point for the consideration of housing needs. The PPG confirms the NPPF position that the Standard Method only provides the minimum level of housing need for a local authority area and does not take into consideration other factors which affect demographic behaviour. The PPG also sets out that there will be circumstances where the housing requirement could be increased to a level which is higher than that identified through the Standard Method. These circumstances include (but are not limited to):
- Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. housing deals).
 - Where strategic infrastructure improvements are planned that would support new homes.
 - Where an authority has agreed to take on unmet need, calculated using the Standard Method from neighbouring authorities, as set out in a SoCG.

- Previous delivery levels, where these have exceeded the minimum figure identified; and
- Recent assessments of need, such as a SHMA, where these suggest higher levels of housing needs.

2.3.15 The SHMA has assessed whether exceptional circumstances exist to justify an alternative approach to using the local housing need assessment as the basis for the Council's housing requirement. Such approaches would be based on growth funding, strategic infrastructure improvements and addressing the unmet housing needs from surrounding local authorities.

2.3.16 The position on neighbouring authorities having unmet housing needs is changing however, the Council is aware that Havant have formally requested help to meet their unmet needs. Gladman welcome the fact that a Spatial Position Statement has been produced (December 2023) by the Partnership for South Hampshire setting out the current level of housing need and supply in South Hampshire. However, whilst it identifies a supply shortfall in meeting housing needs across South Hampshire this reflects that a number of Local Plans are at the early stages of plan preparation. As individual Local Plans progress, each Local Planning Authority will consider whether they can meet their need. The SPS must be updated to reflect this in the future.

2.3.17 National policy is clear where unmet housing exists, neighbouring authorities need to help provide for these housing needs, however the Council have opted to postpone consideration of unmet needs until the levels of need have been quantified through the local plan processes of neighbouring authorities.

2.3.18 Gladman does not consider the Council's consideration that no unmet needs will need to be factored into the assessment above standard method to be appropriate. This is not considered to be positively prepared. Despite only Havant having made a formal request to date, unmet needs arising from the PfSH area is well known and stands in the region of circa 13,000 dwellings. Given Test Valley's location and proximity to Southampton, it is well located to accommodate a significant proportion

of the current unmet needs arising from the city and this needs to be factored into the assessment.

- 2.3.19 Furthermore, the Council have not considered it necessary to increase the housing requirement to increase the quantum of affordable housing delivered in the area. An affordable housing need of 437 has been identified which is significant. To meet this need, the housing requirement would need to be 1,222 dwellings per annum, as noted in the Housing Topic Paper. Though this is a significant uplift which may not be justified, it clearly demonstrates that affordable housing needs are significant, and the Council should consider an uplift to meet affordable housing needs, even if they are not met in full. This approach has been proposed and examined through the East Riding of Yorkshire Local Plan Review, and Gladman recommend that a similar approach is taken here to increase the supply of both market and affordable homes.

Spatial Strategy Policy 4 (SS4): Rural Housing Requirement

- 2.3.20 Gladman consider that while a specific rural requirement may be helpful, the policy as drafted is ineffective as it fails to specify how the policy will be used and how it will impact the decision making process. Instead, the supporting text at paragraph 3.79 states that this is a device for monitoring delivery of rural housing which will trigger a review if insufficient homes are provided in rural areas. If this is the case the council will review options for bring forward more homes. Gladman consider that this policy must be redrafted to outline this review process and the relevant triggers to ensure that it is effective in monitoring and maintaining a rural housing land supply.

Spatial Strategy Policy 5 (SS5): Neighbourhood Development Plan Housing Requirement

- 2.3.21 Gladman do not consider it appropriate for the Local Plan to cap housing numbers in sustainable locations based on Neighbourhood Plans that have preceded this document. The Local Plan is able to, and should be, directing the required and suitable levels of growth to settlements such as Wellow to ensure their continued vitality and viability.

- 2.3.22 Based on the preceding Neighbourhood Plan, only 20 new homes will be delivered in Wellow. This is contrary to paragraph 83 of the NPPF which 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 smaller settlements, development in one village may support services in a village nearby."

- 2.3.23 Furthermore, the PPG² is clear that:

The National Planning Policy Framework expects most strategic policy-making authorities to set housing requirement figures for designated neighbourhood areas as part of their strategic policies.

- 2.3.24 However, in this context, the following PPG³ part is relevant:

Where a neighbourhood plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the local plan. Local plan policies should not duplicate those in the neighbourhood plan, and do not need to supersede them unless changed circumstances justify this. It is important for local plans to make appropriate reference to neighbourhood plan policies and proposals, and similarly for neighbourhood plans to acknowledge local plan policies that they relate to.

- 2.3.25 Gladman consider that the emerging housing requirement, significant potential for unmet needs arising from neighbouring authorities and Gladman's demographic analysis justifies a change in circumstances and therefore an uplift in the housing requirement for Wellow.

- 2.3.26 Similarly, as per previous comments, Wellow has been recategorized from a tier 2 settlement to a tier 3 settlement since the previous consultation. If Wellow had remained a tier 2 settlement (as Gladman believe it should), this would also justify a higher level of growth in accordance with its settlement hierarchy status. However, the use of a flawed and unjustified methodology has simply resulted in the

² Paragraph: 101 Reference ID: 41-101-20190509

³ Paragraph: 006 Reference ID: 61-006-20190723

Neighbourhood Plan requirement being replicated and no due consideration to the actual needs of the settlement.

2.3.27 A top-down apportionment of housing need for Wellow parish can be conducted using various approaches and data. Due to the current stage of plan-making across the New Forest and Test Valley areas and the policy and environmental constraints which affect the parish, the following scenarios have been tested:

- **Scenario 1:** Top-down apportionment utilising adopted Rural Test Valley housing requirement up to 2040.
- **Scenario 2:** Top-down apportionment utilising the adopted Northern Test Valley housing requirement up to 2040.
- **Scenario 3:** Top-down apportionment utilising the emerging Northern Test Valley up to 2040.

2.3.28 Under scenario 1: Top-down apportionment utilising the adopted Rural Test Valley housing requirement up to 2040, it is considered that the housing requirement for Wellow should be a minimum of 87 units.

2.3.29 Wellow parish contains 11.63% of the Rural Test Valley population and therefore, a fair share of the annual Rural Test Valley housing requirement equates to 4.19 housing units. In order to understand what a 'fair share' of the rural housing requirement would have been for Wellow parish over the Test Valley Revised Local Plan period of 2011-2029, the annual figure is multiplied by 18. This suggests that a fair share of the rural area housing requirement would have been 75.35 dwellings, rounded up to 76.

2.3.30 According to the Neighbourhood Plan evidence base, 36 dwellings were completed or had planning permissions on 31 March 2021. Therefore, between 01 April 2021 and 31 March 2029 there is a residual requirement for Wellow of 40 dwellings.

2.3.31 To understand the housing requirement for Wellow over the period 2029 up to 2040 using this information we can extrapolate the fair share annual requirement of 4.19

dwelling identified in paragraph 3.3.5 over the residual 11 plan period years. This equates to an additional requirement of 46.09 dwellings, rounded up to 47 units.

2.3.32 Therefore, over the proposed plan period of 2020-2040 a fair share housing requirement for the parish of Wellow using its identification as a Rural Test Valley village is a **minimum of 87 units**.

2.3.33 Scenario 2: Top-down apportionment utilising the adopted Northern Test Valley housing requirement up to 2040, builds on the minimum established in scenario 1 and considers the housing requirement if Wellow had maintained its settlement status alongside Andover and Romsey, as Gladman consider it should.

2.3.34 It is considered that a more appropriate assessment is to use a top down apportionment of the Northern Valley housing requirement against the usual resident population for the period 2020-2040.

2.3.35 The 2021 Census data identifies that Wellow contains 3.75% of the usual resident population of the NTV area. Therefore, a fair share of the annual NTV housing requirement for Wellow equates to 14.77 housing units and 295.41 dwellings, rounded up to 296 dwellings over the period 2020-2040.

2.3.36 This assessment has not acknowledged the housing completions and planning permissions as of 31 March 2021 in the same manner as scenario 1 due to utilising a different starting point for the housing requirement figure and base date. However, the annual completion rate for Wellow parish up to 2021 was 3.6 dwellings and it would be appropriate to remove 4 dwellings from this requirement, equating to a requirement of 292 dwellings.

2.3.37 Even if the 36 units were subtracted from proposed housing requirement figure for Wellow, **260 dwellings** would still be required for the parish over the period 2020-2040.

2.3.38 Scenario 3: Top-down apportionment utilising the emerging Northern Test Valley housing requirement up to 2040, provides a further top-down apportionment assessment utilising the latest housing need information for the Test Valley as set out

in the New Local Plan Regulation 18 Stage 2 document, including the updated percentage split between the two HMAs.

- 2.3.39 The housing need split between the HMAs is proposed to change back to a 57:43% split to from a 67:33% split alongside an increase in the overall housing need to 11,000 homes (550 dwellings per annum).
- 2.3.40 As identified in Scenario 2, the 2021 Census data identifies that Wellow contains 3.75% of the usual resident population of the NTV area. Therefore, a fair share of the emerging annual NTV housing requirement for Wellow equates to **235 dwellings** over the period 2020-2040.
- 2.3.41 The above scenarios highlight that simply reiterating the Neighbourhood Plan requirement for 20 dwellings is contrary to housing needs evidence and should be reconsidered. These figures are also based on the minimum requirement of 11,000 dwellings, before the consideration of unmet housing needs, therefore they could be higher once the unmet need figure is calculated.
- 2.3.42 Therefore, to summarise, Wellow's housing requirement should not simply be what is within the Neighbourhood Plan and should be calculated using the latest Housing Needs Assessment and considering Wellow as a sustainable settlement either within the rural housing needs or the housing needs of Northern Test Valley. This results in a minimum of 87 dwellings, and potentially over 235 dwellings, against which 20 is a significant shortfall with material consequences for the settlement.

Spatial Strategy Policy 6 (SS6): Meeting the Housing Requirement

- 2.3.43 Table 3.3 identifies a borough wide residual requirement of 5434 dwellings over the period 2020 to 2040. This figure is split between the two very distinct HMAs and requires Southern Test Valley to accommodate a residual requirement of 1644 dwellings and Northern Test Valley to accommodate 3,790 dwellings.
- 2.3.44 Gladman have fundamental concerns with proposing a split in housing requirement across HMAs, particularly as the Council propose to continue to treat them separately in terms of housing land supply calculations. Housing needs must be assessed at

borough level and there is no supporting national policy that supports the use of HMAs to determine supply areas. Boundaries between HMAs are not suitable for use in this regard and therefore Gladman consider that if the Council choose to split their spatial strategy across the HMAs, supply should be assessed on a borough-wide level and no policy should be used to arbitrarily restrict development in one part of the borough to meet the needs in another when a shortfall occurs.

2.3.45 Secondly, notwithstanding comments in relation to unmet needs of neighbouring authorities and the level of affordable housing need, the Council will need to be mindful that housing sites identified may not deliver as anticipated. To ensure a positive approach is set out it is recommended that a flexibility buffer is provided to ensure the Local Plan to be flexible enough to accommodate needs not anticipated in the plan.

2.3.46 It is therefore important that a flexibility factor is included so that sufficient capacity exists to ensure all needs are met in full. It therefore stands to reason that in order for the minimum number of homes to be delivered, then the Council will need to allocate beyond its minimum housing requirement in a reasonable way. The only way of achieving this is to provide a healthy contingency within its housing supply of development land through the identification of additional housing allocations.

2.3.47 There is no hard and fast rule for flexibility that should be built into Local Plans to deliver the housing requirement but many experts in the housing sector often advocate the use of a 10-20% buffer of sites.

Spatial Strategy Policy 9 (SS9): Delivery, Monitoring and Contingency

2.3.48 Gladman consider this policy as drafted highly ineffective, though welcome the fact that the Council will monitor delivery.

2.3.49 Firstly, Gladman would question how effective monitoring can take place without a trajectory being included in the plan. Paragraph 3.102 states that housing trajectory is provided however this is not within the Local Plan as per the requirements of paragraph 75 of the NPPF which requires a housing trajectory to be included in the

local plan illustrating the expected rate of delivery over the plan period and must be included in the next iteration of the local plan. Without this, any monitoring policy is ineffective.

2.3.50 To support this policy, the Council must set out evidence trajectories for all the key sources of supply that are expected to contribute to housing supply over the plan period. Though one such a trajectory has been included in the evidence, there is no evidence setting out the delivery expectations of committed sites and as well as allocations. Such trajectories are essential in ensuring that stakeholders, and the Council, can scrutinise the delivery assumptions and realities effectively.

2.3.51 Furthermore, Gladman consider that the policy must list the expected actions if delivery is failing and recognise that delivery delays are not always the fault of development partners. It is essential that the Council considers whether slow decision making is impacting on the delivery of new development. Too often development is delayed whilst applicants wait for planning approval to be granted and pre-commencement conditions approved. We would also expect some of actions listed, such as liaison with the development industry to be undertaken regularly and not once delivery is not in accordance with what is expected. The Council should ensure that these issues do not arise in the first place rather than waiting until the delivery of development is not as expected.

2.4 Chapter 4: Test Valley Communities

Southern Test Valley

2.4.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.

- 2.4.2 Test Valley Council should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Local Plan's decision-making and scoring should be robust, justified, and transparent.
- 2.4.3 In the context of the allocations in the Southern Test Valley HMA, Gladman do not consider that the scoring and selection of sites is robust, justified, and transparent as it fundamentally does not direct growth to the most sustainable settlements and does not allocate the sites that have scored most favourably. The plan cannot be considered sound when the evidence base is not being followed.
- 2.4.4 In identifying and assessing reasonable alternatives relating to the scale of housing need the SA considers that only one reasonable option has been identified, which is applying the standard method to identify local housing needs. The Council does not consider the need to accommodate a higher level of housing growth to assist in delivering unmet housing needs from neighbouring authorities to be a reasonable alternative. This is on the basis that no formal requests have been received regarding any unmet housing needs that would need to be addressed in Test Valley, despite a formal request from Havant being made.
- 2.4.5 Gladman does not consider this proposed approach to be appropriate or effective. As highlighted previously, there is significant uncertainty over the level of unmet housing needs arising from the PfSH area which needs to be redistributed between the PfSH authorities. Test Valley will almost certainly need to accommodate unmet needs from neighbouring authorities, and this should be factored into the assessment once greater certainty is provided over the quantum of unmet need Test Valley will need to accommodate.
- 2.4.6 With this in mind, Gladman consider that Land at Lodge Farm should be considered as an additional site that can help meet unmet needs as well as local needs in a suitable, sustainable location. The table below shows that the site scores comparably

with the chosen allocations, even better in some respects, and therefore should be selected ahead of the regulation 19 draft plan. Full details can be found in the accompanying StoryMap, for the land in Gladman's control to the east of Halterworth Lane, which shows the sustainability and suitability of the site.

Table 1: Comparative scoring of Romsey allocations

SA Objective	Criteria	GDL Site 139	Allocation 284	Allocation 82
Objective 1: Ensure everyone has the opportunity to live in an appropriate and affordable home that meets their needs	A) Is the site able to address a particular housing need?	?	?	+
Objective 2: Ensure the local economy is thriving with high and stable levels of growth, whilst supporting productivity and the promotion of a diverse economy, with the availability of a skilled workforce	A) Is the site likely to increase future economic and employment opportunities?	o	o	+
	B) Is the site accessible to a strategic employment site by sustainable modes of transport?	++	+	++
	C) Is there connection to high quality broadband?	++	++	++
	D) Is the site accessible to Andover or Romsey Town Centres?	++	++	++
Objective 3: Maintain and improve access to services, facilities, and other infrastructure, whilst improving the efficiency and integration of transport networks and the availability and utilisation of sustainable modes of travel.	A) Is the site accessible to early years education provision?	++	++	++
	B) Is the site accessible to a Primary School?	++	+	++
	C) Is the site accessible to a Secondary School?	++	-	+/-
	D) Is the site accessible to a Convenience Store including at a Local/District/Town Centre?	++	++	++
	E) Is the site accessible to a Primary healthcare facility (GP, Health Centre or Hospital)? [this does not include dentist provision]	-	+/-	++

	F) Is the site accessible to a community facility?	++	++	++
	G) Can the site readily connect to cycleways and footpath networks?	++	++	++
	H) Is the site accessible to a bus or rail service?	+	++	++
	I) Is the site able to connect to the highway?	-	+	+
Objective 4: Encourage the efficient use of land and conserve soil resources.	A) Is the site on previously developed land?	-	-	+/-
	B) Will development result in the loss of best or most versatile agricultural land?	-	+	+/-
	C) Does the site fall within a mineral and waste consultation area?	+/-	+/-	+/-
	D) Does it include a former landfill site?	0	0	0
Objective 5. Conserve and, where possible, enhance the water environment and ensure the sustainable management of water resources.	A) Is site within a groundwater source protection zone?	+	+	+
Objective 6: Seek to avoid and reduce vulnerability to the risk of flooding and the resulting detrimental effects to the public, economy and environment.	A) Does the site contain areas at risk of or potential to be susceptible to flooding, either now or in the future?	+/-	+/-	+/-
Objective 7: Maintain and, where possible, enhance air quality	A) Would development of the site lead to concerns on air quality in light of national air quality objective levels?	?	0	?

Objective 8: Conserve and, where possible, enhance the Borough's landscape, townscapes and settlement character	A) Would development affect landscape character and protected landscapes?	+/-	+/-	+/-
	B) Does the site relate well to the existing settlement and to the immediate context/surrounding area?	+/-	+	+/-
	C) Does the site have the potential to impact the distinction between settlements, or lead to a risk of physical or visual coalescence, where this is relevant to settlement identity?	-	o	-
Objective 9: Conserve and, where possible, enhance the historic environment and the significance of heritage assets	A) Is development likely to conserve or enhance the significance of heritage assets, their setting, and the wider historic environment?	0	o	0
	B) Is development likely to conserve or enhance the significance of sites of archaeological interest?	+	+	-
Objective 10: Conserve and, where possible, enhance biodiversity and habitat connectivity	A) Will the development conserve and enhance protected sites (internationally, nationally and locally) in line with relevant legislation and national policy?	-	-	--
	B) Will the development conserve habitats and species, achieve net gains for biodiversity and enhance the local ecological network?	+/-	+/-	+/-
	C) Would development conserve and enhance quality local green infrastructure provision?	?	+	+
	D) Would development affect protected and unprotected trees?	+/-	-	+/-

Objective 11: Support the delivery of climate change mitigation and adaptation measures	Will the site contribute towards reducing our impact on the climate?	+/-	+/-	+
Objective 12: Seek to maintain and improve the health and wellbeing of the population	A) Is the site accessible to open space?	++	++	++
	B) Is the site accessible to sports facilities?	+	++	+
	C) Would development support the retention and / or enhancement of access and rights of way to the countryside?	+/-	+	+/-
	D) Would development of the site be able to minimise the risk of exposing people to inappropriate levels of noise pollution?	+	-	-

2.5 Chapter 5: Theme Based Policies

Policy CL3: Sustainable Buildings and Energy Use

- 2.5.1 It is acknowledged that the planning system has an important role to play in tackling the effects of climate change. In this respect, the overarching environmental objective of sustainable development cited in the National Planning Policy Framework highlights how the planning system should help to mitigate and adapt to climate change and support the transition to a low carbon economy.
- 2.5.2 However, Gladman disagree that this needs to be done through policies of the Local Plan given that there is already a national approach, the Future Homes Standard (FHS), being taken forward to achieve the same goal. Delivering these improvements through building regulations has a distinct advantage over delivering a variety of different approach across the county in that it provides a single approach that all developers understand and can be rolled out at scale.
- 2.5.3 Indeed, in a Written Ministerial Statement from the Minister of State for Housing published on the 13th of December the Government clarified the importance of its commitment to this issue and the need for a consistent approach to building standard in relation to carbon emissions stating:

*"The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the **Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.** The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale."*
[Emphasis added]

- 2.5.4 Therefore, Gladman consider that a policy of this nature will not be required in the plan.

Policy CL4: Water Use and Management

- 2.5.5 Gladman recognise the policy intention and support the delivery of water and energy efficient homes, the policy cannot be fully implemented as the outcome is determined by choice and the Local Plan has no jurisdiction here. Therefore, this policy is ineffective and should be removed from the plan.
- 2.5.6 Additionally, the Secretary of State has said in a Ministerial Statement on the 19th of December 2023 that in: "... areas of serious water stress, where water scarcity is inhibiting the adoption of Local Plans or the granting of planning permission for homes, I encourage local planning authorities to work with the Environment Agency and delivery partners to agree standards tighter than the 110 litres per day that is set out in current guidance".
- 2.5.7 At this time, is not clear why the council consider it necessary to go below the 110 l/p/d that is allowed for through the optional technical standards set out in Planning Practice Guidance. The Council have outlined that the area is in an area of water stress, but it does not appear that water scarcity is inhibiting the council from granting planning permissions or bringing its local plan forward. As such the 110 l/p/d remains the appropriate requirement for new homes and there is no justification for going below this standard.
- 2.5.8 The final paragraph is unsound. Policies in local plans relating to applicants having to show that there is sufficient capacity with regard to water supply and wastewater services are unnecessary and unlawful because they are an attempt to get applicants to do things for which they are not legally responsible. Instead, it is the responsibility of water companies, under S37 and 94 of the Water Industry Act 1991 (WIA 1990), to work with local authorities and the Environment Agency, to plan for the future demand for water services relating to the development requirements proposed in local plans, not applicants.

Policy ENV4: Local Gaps

- 2.5.9 This policy seeks to bring forward all 9 local gaps from the adopted plan in order to help guide the direction of growth and identify areas of countryside which are strategically important in defining settlement edges and settings, and in maintaining separation between them. Gladman consider that whilst it has been put that Policy ENV4 has been written in a positive manner, specifically stating that “development within Local Gaps, *will* be permitted...” (emphasis added) the following criteria is then overly restrictive and forms as an extension to Policy SS2 by adding further protection to the areas outside of settlement boundaries by designating them as “Local Gaps”. Gladman advise that the wording of the policy should be updated to be more flexible, for example there are very few instances where any type of development proposal in a gap would “not diminish the physical separation and/or visual separation”, thus the wording should be focused on assessing whether the proposal would cause harm to the functionality of the gap.
- 2.5.10 Further, Gladman note that all 9 of the “Local Gaps” are all adjacent to the settlement boundaries of the highest order settlements within the borough and cover mainly areas which are not already subject to a national designations adding extra levels of protection such as an Area of Outstanding National Beauty and that the function of these gaps is not necessarily clear within the policy itself.
- 2.5.11 Gladman are aware that supporting the emerging Plan, an updated Local Green Gaps Study (December 2023) has been undertaken. This provides the assessment for the justification in the boundaries for the “Local Gaps” listed at Policy ENV4. Gladman have found that the conclusions for the boundaries and functions of the “gaps” as drawn in the emerging plan do not follow the advice within the evidence base document.
- 2.5.12 For example, for the “Romsey – North Baddesley Local Gap” the Local Gaps Report concludes that:

“Past settlement expansion and exposed settlement edges has weakened the function of the Local Gap in places. Consideration could be given to

amending the Local Gap boundary in the west of this gap, where the existing settlement edge has eroded the rural character. Highwood Lane creates a natural boundary within the gap, by virtue of its mature treed/wooded character. "Amending this part of the Local Gap would not undermine the strategic intent or purpose underpinning it, as the inter-layered field boundary hedgerow vegetation at and beyond Highwood Lane helps reinforce the perceptual qualities of the gap."

- 2.5.13 Gladman therefore advise that the gaps drawn within the emerging plan, are indeed supported by the conclusions of the evidence base document. Gladman wholly support the conclusions given within the Local Gap Report for the specific Romsey – North Baddesley Local Gap, and do not believe that the blanket carry over of the boundary for them is justified by the evidence within the supporting Local Gap Study. Gladman advise that the Council amend this boundary if the Council seeks to retain Policy ENV4.

Policy BIO3: Biodiversity Net Gain

- 2.5.14 This policy sets out the legal requirement for development to deliver a 10% biodiversity gain biodiversity. Gladman note that the policy relates to all development of one or mor dwelling whereas the legislation set out a number of exemptions including de minimis development of less than 25sqm. The policy should be amended to be consistent with the legislation or simply refer to development requirement by the Environment Act to provide a 10% BNG to avoid unnecessary confusion or delays.
- 2.5.15 The policy also refers to the application of the mitigation hierarchy instead of the Biodiversity Hierarchy. Paragraph 74-008 states that the two are distinct with the mitigation hierarchy relating to the refusal of development where significant harm to biodiversity as a result of development cannot be avoided, adequately mitigated, or compensated whereas the BNG hierarchy sets out the priority actions with regard to the delivery of the 10% net gain. Therefore, point i) should be corrected to "Biodiversity Hierarchy" to ensure consistency with the Act and avoid confusion for decision makers.

Policy DES1: Delivery of Sustainable and High-Quality Design (and)

Policy DES2: Design Details and Considerations

- 2.5.16 The policies set out a range of design principles which development proposals should seek to meet. While the government has shown support for development to incorporate good design principles, Gladman would note that the Framework also states at paragraph 133:

"To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety."

- 2.5.17 Whilst Gladman recognise the importance of high-quality design, in accordance with the requirements of the Framework above, design policies should not aim to be overly prescriptive and require some flexibility in order for schemes to respond to site specifics and the character of the local area. There will not be a 'one size fits all' solution in relation to design and sites should be considered on a site-by-site basis with consideration given to various design principles.

Policy HOU1: Affordable Housing

- 2.5.18 This policy states that in seeking to meet the need for affordable housing the council will *negotiate* on the basis of sites of 15 or more delivering 40% affordable housing and sites of 10 to 15 units delivering 30% affordable housing. The decision to set out a negotiating starting point in the plan stems from the viability evidence which suggests that there is no uniform level of affordable housing provision where it can be said most schemes are viable.
- 2.5.19 Gladman are concerned with negotiation being the starting point of affordable housing delivery as the NPPF and PPG both seek to limit the extent to which negotiation is required as a result of local plan policies. As such a local plan that relies

on a negotiation to secure the delivery of its development requirements will face challenges as to its soundness. Given that 40% is challenging for a significant number of developments aside from those in the highest value areas the Council will need to consider whether a differential rate between value areas would be a more suitable approach.

- 2.5.20 With this in mind, Gladman return to previous comments regarding the level of affordable housing need in the borough. If the affordable housing need cannot be reliably delivered through the current level of allocations which require a high percentage on site, the Council should consider an uplift in their housing requirement to allow more sites to come forward with a lower level of affordable housing to help meet these needs.

Policy HOU5: Provision of Housing to Meet our Needs

- 2.5.21 Gladman agree that the housing mix on development sites should reflect local needs at the time of permission, however this should not be limited to the needs of newly forming households. Though the needs of newly formed households should be considered, there will be existing households that have a need for a larger home as a family expands or indeed a smaller home as they seek to downsize. By restricting the consideration of housing mix to just newly formed households, the needs of current households have the potential to be dismissed. Gladman recommend that this policy is amended accordingly.

Policy HOU6: Residential Space Standards

- 2.5.22 Gladman do not consider that the requirement for all residential development to meet the NDSS to be justified. To implement this policy, robust evidence is required to demonstrate why this is necessary and evidence that delivery of these requirements will not impact the viability or delivery of much needed market and affordable homes in Test Valley.

Policy HOU7: Self-Build and Custom Build Housing

- 2.5.23 Gladman consider that the 24 month marketing period is excessive and recommend that this is reduced to 12 months. If a plot is suitably marketed for 12 months, with no reasonable interest, the plot should revert to market housing to be developed by the housebuilder on site.

3 SITE SUBMISSIONS

3.1 Introduction

- 3.1.1 As the Council are aware, Gladman are currently promoting a number of sites for residential development and associated community infrastructure across Test Valley borough. The sites are situated in sustainable locations and offer the potential to deliver high quality residential development to meet the local planning authority's housing needs.
- 3.1.2 Further details of our site interests are provided in the Story Map attached to this available here:
<https://gladman.maps.arcgis.com/home/item.html?id=f282652b95ab4443bc3d38eb9914006c>
- 3.1.3 In no particular order of important or suitability for development, the sites comprise:
- Land at Flexford Road, Valley Park
 - Land at Halterworth Lane, Romsey
 - Land off Romsey Road, West Wellow
- 3.1.4 Firstly, Gladman can confirm that all three sites are available for development and are deliverable. There are not expected to be any insurmountable constraints to the development of the sites as proposed.
- 3.1.5 Gladman has a proven record in ensuring the delivery of sites. We keep a detailed record of all sites which we gain a planning permission and monitor progress from sale to a housebuilder through the remainder of the planning process up to first completions on the ground. We are happy to provide you with further details regarding this should you wish, the average timescale from permission to a spade in the ground is around 18 months.
- 3.1.6 Gladman would welcome the ability to meet with the local planning authority to discuss the contents of the Story Map with the authority's officers, and how the sites

we are promoting could help the Council in delivering the housing requirement as well as a balanced spatial strategy for the borough. Gladman look forward to engaging with the Council further as work on the authority's new Local Plan progresses and invite the Council to contact us in this regard following the end of the consultation.

4 CONCLUSIONS

4.1 Summary

- 4.1.1 Gladman welcomes the opportunity to comment on the Regulation 18 Stage 2 Draft Local Plan that is currently being consulted on by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2023) and the associated updates that were made to Planning Practice Guidance.
- 4.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 4.1.3 Gladman have three main issues with the plan. Gladman do not consider that the Plan nor the accompanying SA has suitably considered the emerging unmet needs arising from neighbouring authorities, and therefore has failed to positively plan to meet those needs. Secondly, Gladman do not agree that the Local Plan should simply repeat Neighbourhood Plan housing requirements, particularly for Wellow, and should undertake a strategic assessment of the true needs in those areas and make suitable allocations. Third, the inclusion of "Local Green Gaps" is not suitably justified or flexible nor do the boundaries, as drawn wholly conform with the supporting evidence base documents supporting the inclusion of emerging Policy ENV4.
- 4.1.4 We hope you have found these representations informative and useful towards the preparation of the Test Valley Local Plan.
- 4.1.5 Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at



