



TEST VALLEY LOCAL PLAN 2040

REGULATION 18 STAGE 2

REPRESENTATIONS

BRACKEN WOOD, JERMYN'S LANE, ROMSEY

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1.0 INTRODUCTION

- 1.1** This representation is submitted by Highwood on behalf of Highwood in response to the Test Valley Borough Council (TVBC) Draft Local Plan 2040 Regulation 18 Stage 2 consultation.
- 1.2** This submission follows previous representations made as part of the Stage 1 Regulation 18 consultation in 2022.
- 1.3** Highwood are promoting redevelopment of Bracken Wood in Jermyn's Lane, Romsey to provide specialist accommodation for older people at the site to meet the ever growing and critical need for such accommodation.
- 1.4** The site has been assessed within the most recently published Strategic Housing and Employment Land Availability Assessment (SHELAA), ref. No. 49 and was taken into consideration up to 'Stage 4' of the Council's 'Site Selection Process'. However, the assessment is based upon an open-market housing scheme (c3) for 40 homes and does not consider the site for a (c2) Care Home with circa 10 retirement units. These representations are accompanied by an updated 'Call for Sites' pro-forma.
- 1.5** Bracken Wood is in a sustainable location on the edge of Romsey, offering high quality development that will not only help meet local and district-wide specialist housing needs, but also offer bespoke and unique economic as well as social benefits.
- 1.6** The National Planning Policy Framework (NPPF) provides four tests that must be met for Local Plans to be considered sound. In this regard, it is essential that plans should be:
- **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 be,
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

- 1.7** The following comments are designed to help strengthen the policies within the draft local plan to enable the Council to progress to Regulation 19 with a plan that is legally compliant and sound, consistent with national policy and guidance.
- 1.8** We would very much welcome an opportunity to work with the council on realising the benefits of the proposals being put forward at Bracken Wood, as part of a sound local plan in line with the NPPF tests.
- 1.9** Our representations request that the council review their draft local plan policies and allocate the site at Jermyn's Lane to help deliver a sound plan ahead of Regulation 19 consultation and subsequent examination.

2.0 LEGAL COMPLIANCE

THE DUTY TO CO-OPERATE

- 2.1** Despite being a specialist form of accommodation, housing for older people must be considered in the context of the wider need for housing, as the units provide a source of supply that contributes towards meeting the housing requirement (subject to paragraph: 016a of national planning practice guidance).
- 2.2** The Duty to Co-operate is a legal requirement that obliges local authorities to engage constructively, actively and on an ongoing basis with neighbouring local authorities on cross-boundary, strategic issues throughout the process of local plan preparation.
- 2.3** National policy relating to the Duty is set out in the NPPF, supported by national planning practice guidance (PPG). Authorities are required to prepare Statements of Common Ground (SoCG) to show that plan policies have been prepared in cooperation with neighbours where cross boundary strategic issues exist, such as identifying housing and employment needs across a sub-region.
- 2.4** Test Valley are a member authority of the Partnership for South Hampshire, a voluntary partnership of councils (along with East Hampshire, Eastleigh, Fareham, Gosport, Hampshire County, Havant, New Forest, Portsmouth, Southampton, and Winchester Councils and New Forest National Park) who have recently concluded a suite of work on various strategic, cross boundary matters, including publication of a Spatial Position Statement and Statement of Common Ground between the authorities.
- 2.5** Whilst it is welcomed that reference is made in the emerging plan to the PfSH Spatial Position Statement of December 2023 and mention of the approximate 12,000 shortfall in homes to 2036 across the sub-region, it is not acceptable that TVBC as part of PfSH does not seek to make a contribution towards making up the identified shortfall, particularly in the south of the borough – and especially as East of Romsey is identified in the Position Statement as a ‘Broad area of Search for Growth’ by PfSH.

- 2.6** This risks the plan being found not legally compliant in terms of not fulfilling the duty to co-operate, but is also potentially an unsound approach to setting of a housing requirement and housing supply.
- 2.7** It is notable in this regard that the PfSH shortfall is only calculated to 2036 (where the TVBC plan period is 2040 and should be longer), meaning strategic policies (15 year minimum from date of adoption) should likely plan for an even greater level of unmet need.
- 2.8** East Hampshire District Council, another PfSH authority, have recently consulted on a draft Reg. 18 local plan that doesn't make any contribution towards meeting the identified unmet need either, (albeit an area which doesn't include a 'Broad area of Search for Growth' like Test Valley does, but which has a National Park constraint that Test Valley does not). If every authority across PfSH takes this approach, the shortfall will never be addressed.
- 2.9** To demonstrate legal compliance ahead of Reg. 19, the council should positively review whether any contribution can be made to unmet need arising from within the PfSH area and consequently allocate additional sites in the southern part of the Borough, to conclusively show that a credible process of co-operation has been undertaken and strategic issues arising from that co-operation have been properly addressed within the plan.

3.0 THE PLAN PERIOD

- 3.1 The local plan (and associated updated LDS, Nov 2023) has an optimistic projected adoption date of Q2 2026 (as also stated in Fig.19 on page 9 of the Plan), with an end date for the plan period up to 2040.
- 3.2 This is contrary to Paragraph 22 of the National Planning Policy Framework (NPPF) which requires strategic policies to look ahead over a minimum 15-year period from adoption – not the date of submission for examination.
- 3.3 Considering the prolonged duration of time it has taken the council to reach this current stage of plan formulation (Appx 1 of the LDS shows it began the review process six years ago in 2018 and consulted on other Reg.18 versions of the plan in 2020 and in 2022), it would surely be prudent and more robust an approach to extend the plan's timeframe as a precautionary principle to ensure that paragraph 22 of the NPPF is complied with.
- 3.4 Our suggestion is that the plan's timescale be extended by at least an additional two years, concluding in 2042.
- 3.5 Strategic policies (including housing supply policies) need to be reviewed accordingly – the housing requirement will need to be recalculated and additional housing allocations set out within the Local Plan to meet the need arising from an extended period. So a two year extension would result in an uplift of 1,100 new homes needed using 550 dpa.
- 3.6 This is a fundamental matter and therefore important to consider at this stage (rather than later which could lead to further delays ahead of adoption) to ensure sufficient homes are planned for in the next Reg. 19 stage of the plan sufficient to provide for a minimum 15-year period from adoption.

4.0 THE SPATIAL STRATEGY AND SETTLEMENT HIERARCHY

SPATIAL STRATEGY

- 4.1** Highwood strongly support the Council's confirmation that they will be pursuing a strategy that includes directing development to areas including Romsey, Andover and other larger settlements.
- 4.2** We support acknowledgement at para 3.12 of the plan and through the Settlement Assessment work undertaken that the market towns of Andover and Romsey as the highest tier 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.

SETTLEMENT HIERARCHY

- 4.3** Highwood support the identification of Romsey within the "Spatial Strategy Policy 1 (SS1): Settlement Hierarchy" on p.38 as a Tier 1 settlement, suitable for strategic allocations, windfalls and strategic/small scale employment.
- 4.4** 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.

5.0 MEETING HOUSING NEEDS

- 5.1** The use of the Standard Method (as required by the NPPF) to calculate housing need and the commitment to meet the need derived from the Standard Method is supported.
- 5.2** We also agree that the Standard Method calculation needs to be regularly reviewed based on the latest information (for example updated affordability data).
- 5.3** However, we continue to be very concerned that TVBC continue to contend that there are no ‘exceptional circumstances’ to justify a higher housing requirement. The factors resulting in our argument at the Reg 18 stage 1 consultation remain not just valid, but have worsened, making the imperative of increasing the district housing need higher.
- 5.4** The PPG is clear that the Standard Method ‘provides a minimum starting point in determining the number of homes needed in an area’ which the draft plan recognises at para 3.54. 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’.
- 5.5** Reflecting our comments made above on timescales, the outputs of the standard method should be updated and the minimum number of homes to be provided uplifted to reflect a later end to the plan period to ensure 15 years from date of adoption consistent with paragraph 22 of the NPPF.
- 5.6** This means that Table 3.3 ‘Housing Requirement and Supply’ and Policy SS3 would need to be updated to include a further two years of requirement and therefore an uplift of 1,100 homes (at 550 dpa) to the housing requirement, plus any contingency considered necessary.

UNMET NEEDS

5.7 Highwood maintain that TVBC should be meeting some of the significant unmet housing needs arising from their neighbouring authorities.

5.8 The NPPF, point (a) of paragraph 35 is clear that plans should be:

‘a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development’ [our emphasis].

5.9 NPPF paragraph 67 goes onto state:

‘The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.’

5.10 Paragraph 5.34 of the Interim SA states that,

“The discussion of strategic / top down factors presented above does not provide any clear basis for exploring scenarios that would involve setting the housing requirement at a figure above LHN. However, for South Test Valley only, the possibility should not be ruled out, given ongoing uncertainty regarding unmet need. This matter is discussed further below in relation to broad distribution and growth scenarios for the north and south of the plan area.”

5.11 Paragraph 5.79 states that,

“Test Valley Borough Council is engaged in ongoing discussions regarding housing provision and unmet need with neighbouring authorities including the PFSH (Partnership for South Hampshire) authorities. As concluded in the previous section, there is currently no definitive unmet housing need from neighbouring authorities to accommodate in Test Valley. However, there is potential for unmet housing need from south Hampshire

authorities to be identified during preparation of this plan. Therefore, it is appropriate to identify and appraise reasonable alternative growth scenarios in the south of the plan area only. However, these growth scenarios would need to be reassessed if definitive unmet need is identified during the preparation of the Test Valley Local Plan 2040.”

- 5.12** It is true that LPA's in the PFSH area are at different stages of plan making, but this is an inevitable function of the disparate plan making system in England and is not an excuse for delaying meeting unmet needs that adversely affects the affordability of housing in all areas. The PFSH December 2023 Position Statement still reports a shortfall in housing of nearing 12,000 units (based on a period only up to 2036) and it is not clear how a point where a 'definitive unmet need' is ever going to be identified without a proper process for sub-regional co-operation.
- 5.13** The biggest deficit arises from New Forest District which has a shortfall of 5,652. Given the New Forest District plan was adopted relatively recently (July 2020) and given the constrained nature of the district, the majority of which is within the New Forest National Park, it is unlikely that this need is going to be met within New Forest District any time soon, whilst Test Valley on the other hand have an opportunity to help address some of this need, being an adjoining authority with no such national constraints in play.
- 5.14** Southampton, TVBC's southern neighbour, has also requested TVBC explore options for a higher housing number, presumably to assist in meeting unmet needs arising there. This also means it is very unlikely Southampton, which is constrained by its urbanised nature, will take on any of the unmet need arising from the New Forest District. Havant Borough Council have also made a formal request for TVBC to help meet their unmet need of circa 2,000 homes.
- 5.15** All of this points to an exceptional need for housing in the area which is continuing to remain unmet. Councils have a Duty to Cooperate (see our comments above) and there is at this time insufficient evidence that TVBC have seriously engaged and collaborated with its neighbours on how to address the pressing cross-boundary strategic matter of housing need.

- 5.16 Test Valley is also, as previously set out on the representation made to the Stage 1 consultation, significantly less constrained – arguably being the least constrained of all of the PfSH authorities. Its suitability for accommodating unmet needs is demonstrated by the recently agreed PfSH Statement of Common Ground (December 2023) which identifies, two potential greenfield ‘Broad Areas for Growth’ within Test Valley at Romsey and Chandlers Ford, out of a total of only five identified areas in South Hampshire. This demonstrates that Test Valley is the most suitable and sustainable location for meeting a reasonable proportion of South Hampshire’s unmet need.
- 5.17 This alone represents a clear reason to seriously consider increasing the housing requirement for the plan period to assist in meeting this need. TVBC has a significant opportunity to help meet as yet unmet needs within their boundaries within the STV HMA.
- 5.18 Whilst to date, only Havant borough have made a request for TVBC to meet any potential unmet housing needs, there surely must be a significant possibility that TVBC, being a relatively unconstrained authority area will need to accommodate unmet needs of the wider sub-region. It is noted that this position has not been considered in the SHMA (2022).
- 5.19 TVBC should not wait for several ‘requests’ to meet unmet need from other local authorities through SoCGs, given the level of unmet in the area is already well understood and acknowledged through PfSH, but instead should be proactively planning to meet the already identified shortfall. Failure to do this will undermine the soundness of the plan.
- 5.20 Therefore, the council must proactively explore with their neighbours now how TVBC can help meet the unmet needs of the sub-region. 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 and as suggested in earlier sections, risks a plan being progressed that is not legally compliant or sound.

AFFORDABILITY

- 5.21 The evidence produced by the Council in support of the latest draft and summarised in the Housing Topic Paper highlights a stark fact – **the absolute affordable housing need alone in the District is 652 dwellings per annum.**
- 5.22 The Housing Topic paper, irrationally, appears to argue at 3.15, that because this need cannot realistically be met and because there is unlikely to be sufficient market demand for the level of overall housing that would be required to meet the affordable housing need, this, TVBC consider, means it is not appropriate to increase the housing requirement at all.
- 5.23 Whilst it is appreciated there may be justified reasons for not increasing the overall housing requirement to try and accommodate all the affordable housing need, this is not a reason to not seek any uplift at all to meet a greater proportion of the currently dire need for affordable housing in the district. The SHMA (2022), whilst not setting a target, states ‘...that affordable housing delivery should be maximised where opportunities arise.’
- 5.24 Viable market led developments are the surest way of maximising affordable housing delivery. Market led sites would help better address the acute affordable housing need in a sustainable way.
- 5.25 It is commonly acknowledged that housing affordability in the south-east region has worsened since before covid, 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 9.39 times average earnings – up from a ratio of 4.93 in 1997.
- 5.26 A review of house price data (Rightmove, March 2024 using HMLR sources) suggests average values in Romsey of £395,191 compared to the district median house price of £315,000 quoted in the SHMA indicating a particular issue with affordability in Romsey.

CONTINGENCY

- 5.27 In addition to the above, TVBC should carefully consider whether a 10% contingency buffer to their housing supply to help make sure their requirement is met is sufficient. The currently preferred approach relies disproportionately on new, larger, strategic sites, 81% of which are 800 or more units. Strategic sites of this size are inevitably more complex and take longer to commence. A local example is Whitenap. They also often require significant infrastructure to be delivered. It does not appear that sufficient consideration has yet been given to the risks of delays in delivery and how this could affect the supply of homes to meet the Council's housing needs.

CONCLUSION ON HOUSING REQUIREMENT – POLICY SS3

- 5.28 Taking our comments above into account, notwithstanding any consideration of unmet needs, affordability or contingency, an extended plan period of an additional two years to 2042 at 550 homes per annum would require an uplift in homes needed by **1,100 to 12,100**.
- 5.29 The figure should be treated as a minimum to be exceeded where possible in order to significantly boost the supply of homes and the acute affordability issues affecting the area and this should be set out clearly in the policy and supporting text.
- 5.30 It is considered that considerably greater numbers of housing allocation should be planned for in the emerging Local Plan. Any unmet need from neighbouring authorities should be properly quantified, identified and included in the housing requirement so that a contribution can be made towards addressing such undersupply.
- 5.31 The needs of accommodation for older people, see Section 6 below, should be quantified and identified within **Policy SS3**.

POLICY SS6

- 5.32 'Policy 6 (SS6): Meeting the Housing Requirement' will need to be reviewed ahead of Regulation 19 to ensure that sufficient housing land supply is planned for to meet the revised housing requirement arising from changes that will need to be made to the plan to address points we have raised in previous sections above, not least meeting unmet need from neighbouring authorities and an extension to the plan period.

6.0 SPECIALIST ACCOMMODATION FOR OLDER PEOPLE

- 6.1** The population nationally and in the local area is becoming increasingly old and the demand for adequate, fit for purpose accommodation for older people, including care homes is at an all-time high.
- 6.2** The need for specialist accommodation for older people is acute and demonstrable at a local and national level.
- 6.3** A key element of the evidence base for the Local Plan is the Borough's Strategic Housing Market Assessment (SHMA) (2022). This was commissioned by the Council and completed by Justin Gardner Consulting (JGC). The SHMA (2022) sets out overall housing need. The study also looks at the needs from a range of specific groups in the population, including older persons.
- 6.4** The SHMA identifies a large and growing older person population in the Borough, which is likely to drive the need for additional specialist accommodation in both the rented (affordable) and leasehold (market) sectors, as well as a need for additional care home bedspaces. Extracted tables below.

Figure 7.3: Projected Change in Population of Older Persons, 2020 to 2040 – Test Valley (based on Standard Method housing need)				
	2020	2040	Change in population	% change
Under 65	99,285	106,238	6,953	7.0%
65-74	14,607	17,603	2,996	20.5%
75-84	9,430	14,533	5,103	54.1%
85+	3,841	7,758	3,917	102.0%
Total	127,163	146,132	18,969	14.9%
Total 65+	27,878	39,894	12,016	43.1%
Total 75+	13,271	22,291	9,020	68.0%

Source: Demographic Projections

Figure 7.12: Specialist Housing Need using adjusted SHOP@Review Assumptions, 2020-40 – Test Valley

		Housing demand per 1,000 aged 75+	Current supply	Current demand	Current shortfall/surplus (-ve)	Additional demand to 2040	Shortfall/surplus by 2040
Housing with support	Market	62	477	821	344	558	902
	Affordable	44	409	590	181	401	582
Total (housing with support)		106	886	1,411	525	959	1,485
Housing with care	Market	27	307	360	53	245	298
	Affordable	11	90	148	58	101	159
Total (housing with care)		38	397	508	111	345	456
Residential care bedspaces		34	312	452	140	307	447
Nursing care bedspaces		38	758	508	-250	345	95
Total bedspaces		72	1,070	960	-110	652	542

Source: Derived from Demographic Projections and Housing LIN/EAC

- 6.5 The tables above show that there will be a divergence in the scale of % change between age groups, e.g. a 7% rise in under 65s compared to 102% of 85+, 43.1% of 65+ and 68% of 75+. The consequence is a large, anticipated shortfall in the number of units needed to 2040 which must be planned for to be met.

A PLAN TO MEET THE NEED

- 6.6 Policy 7 (SA7) King Edwards Park, Ampfield allocates land for approximately 44 extra care units. This will only meet only a very small element of the needs identified in the SHMA.
- 6.7 Policy HOU5 references a need to take account of older people in the delivery of housing on major sites. Other need is to be met through general housing/development management policy.
- 6.8 When taken as a whole, the emerging Local Plan does not contain anywhere near enough detail in the way of specific policies which categorically sets out the need, quantity, type, or location of specialist C2 accommodation for older people and how this is to be planned for in the plan period. This is contrary to national policy and guidance and is an unsound strategy.
- 6.9 Paragraph 63 of the NPPF states:

“63. Within this context of establishing need, the size, type and tenure of housing needed

for different groups in the community should be assessed and reflected in planning policies. These groups should include ... older people (including those who require retirement housing, housing with care and care homes)."

6.10 PPG (Paragraph: 001 Reference ID: 63-001-20190626) states that,

"The need to provide housing for older people is critical". The use of the word critical is rare in planning guidance and highlights the importance of this issue and a presence of urgency.

6.11 Paragraph: 013 Reference ID: 63-013-20190626) states,

"It is up to the plan-making body to decide whether to allocate sites for specialist housing for older people. Allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing...."

6.12 In the case of Test Valley, there is clearly an identified need, which is not set out in terms within the plan. Other than at Ampfield, there are no allocations for older persons housing. The plan does not show how the need will be met in a planned way.

6.13 Too much is being left to the vagaries of the market, a hope that major sites might deliver under HOU5, and general development management policies. This is not a planned approach to meeting an unmet need.

6.14 We do not have confidence that the Plan will deliver the specialised accommodation needed and this is important because a more sophisticated mix of different types of accommodation benefits all sectors of the community by helping to reduce costs to the social care/health systems (PPG Paragraph: 001 Reference ID: 63-001-20190626), freeing up housing, particularly underoccupied family housing and not competing for smaller units mainly aimed at first time buyers/younger people when older people are seeking to downsize.

6.15 There are not enough by way of proposed allocations or policies to meet the need

identified in the SHMA. There is no possibility in our view that enough fragmented smaller sites will come forward to meet the identified unmet need and allocations should be provided in this case, in accord with PPG Paragraph 013.

7.0 BRACKEN WOOD, ROMSEY

- 7.1** Carterwood Analytics, a widely regarded industry tool, has assessed the site location for the appropriateness for a care home. The table below demonstrates how the figures led Highwood to conclude that the Bracken Wood site was the ideal location to accommodate a new ‘best in class’ care home.

Radii Around the proposed Site	Number of Bed Shortfall (Incl. Existing and planning granted)	Population Size	% Of the Population >85 (National Avg. = 2.7%)	Staffing Pool	
				Nurses	Care Assistants
3 Miles	157	38,057	4.1	416	896
4 Miles	197	62,319	3.7	662	1,323
5 Miles	301	110,526	3.5	1,514	3,211

Source: Carterwood Analytics

- 7.2** As the table shows, there is a significant shortfall of supply to meet the ever-growing demand for care; a shortfall that the site will go some way towards, without fully satisfying, the large demand. A shortfall which is expected to substantially grow – LaingBuisson’s Care Homes for Older People UK Market Report (31st edition) states that the percentage of the UK population over the age of 85 is projected to multiply more than four times, from c. 1.68 million in 2020 (2.4 per cent of the population) to c. 7.09 million in 2111 (8.7 per cent of the population).
- 7.3** The national average number of over 85s, when measured against total population, is currently estimated to be 2.7%; the table above helps demonstrate that the figure at every catchment around the site is significantly above said national average. This is further emphasised by the fact that Carterwood have identified the average distance that care home residents are happy to travel from their home to their selected care home is 5.4 miles for semi-rural sites with access to local amenities and facilities.
- 7.4** There are significant and growing incidence of dementia in older people – increasing dependency levels of service users means that care home accommodation must be both suitable and flexible to enable care to be provided effectively and safely.

- 7.5 As is clear from the data, the site has a significant quantum of prospective staff in the immediate vicinity and when combined with the bus routes servicing Jermyn's Lane, as well as connections to major A-roads and motorways, which also provide ready access to Romsey Train Station in less than 10 minutes, makes the site both feasible and sustainable for care.
- 7.6 Bracken Wood in Jermyn's Lane, Romsey is sustainably located, suitable, available and deliverable sites and could make a significant contribution towards meeting local need and borough-wide need for specialist care accommodation (class C2).
- 7.7 We will be writing to the council in the coming weeks with further information to assist with the council's local plan evidence base ahead of Regulation 19 within which it is hoped that land at Bracken Wood will be allocated for older person's housing to meet this specialised need.

8.0 CONCLUSION

- 8.1** Highwood have welcomed the opportunity to participate in the TVBC Draft Local Plan 2040 Regulation 18 (Stage 2) consultation.
- 8.2** For the reasons 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.
- 8.3** We support the main focus on Romsey as the most sustainable settlement with the widest range and number of facilities within STV to which most development is to be directed.
- 8.4** Amplifying the case made in previous representations, land at Bracken Wood, 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 ahead of Regulation 19.