

Planning and Building Service
Beech Hurst
Weyhill Road
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Hampshire
SP10 3AJ

Date: 22 March 2024

Dear Sir/Madam

Draft Local Plan 2040 Regulation 18 Stage 2 (2024)

Introduction

This consultation response has been prepared by Lichfields on behalf of O'Flynn Group ('OFG'). O'Flynn Group is promoting the land around Micheldever Station, within Winchester District, as a location for a new Hampshire town which could contribute to the housing needs of Winchester and Hampshire more widely. This letter comprises a formal consultation response to the ongoing Test Valley Regulation 18 Stage 2 Local Plan ('the emerging Local Plan') which runs until the 2nd April 2024. It primarily addresses the housing needs of the area and the extent to which the emerging Local Plan makes provision for those in line with the requirements of the NPPF.

Wider Unmet Need

Tset Valley sits within the Partnership for South Hampshire (PfSH) area and is therefore a signatory to the PfSH Statement of Common Ground (SoCG), the latest revision of which was agreed in September 2023. In considering housing need, the SoCG outlines that should areas within the PfSH continue to have housing needs they cannot fully meet, "*other PfSH LPAs would need to consider whether they could accommodate some of these wider needs through their own local plan reviews, recognising that South Hampshire's housing markets operate across local authority boundaries.*" (Para 1.38).

Para 2.19 of the emerging Local Plan acknowledges that a supply shortfall exists across the Partnership for South Hampshire (PfSH) area. The level of unmet need across the PfSH is quantified within the PfSH Spatial Position Statement (Dec 2023) which confirms that - even assuming a position of zero shortfall within Southampton by not including an apportionment of the urban uplift (as per the December 2023 version of the NPPF) - the shortfall across the PfSH is 11,771 homes over the period 2023-2036.

The PfSH Spatial Position Statement only looks to a horizon of 2036, whereas the constituent plans across the area will look beyond that horizon. The Test Valley Local Plan address a period of 2021 to 2040. There will be further unmet needs in the period beyond 2036, and as such the quantified 11,771 is

in fact likely to be higher over a minimum 15-year plan period as advised by the NPPF. Notwithstanding it is a reasonable starting point for the authorities to address.

The wider unmet need at the sub-regional level (and arising in Test Valley's neighbouring areas) therefore:

- 1 Is unambiguous. It exists and is clearly tangible. To not plan for it will mean families and households' needs going unmet.
- 2 Is reasonably defined in scale. It has been quantified through the PfSH. That PfSH forum will have informed the Council's engagement with neighbouring authorities under the duty-to-cooperate, and is likely to be relied upon as discharging the legal duty-to-cooperate; and
- 3 Needs to be considered and addressed within the confines of this Local Plan process, either via the Plan making provision for it, or the Plan being based on an agreed strategy that identifies how other neighbouring Local Plans will make provision for it.

National Policy Position

The NPPF is clear that:

"Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas" (Para 11b) (emphasis added)

It is also clear that Local Plans, to be found 'sound', need to be:

"a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; 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; ...

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground..." (Para 35c)

Applied to Hampshire, and this round of Plan-making, it is clear that those authorities within the PfSH progressing Plans will need to ensure those unmet needs are met across the area to be found sound. It would not be sound to "defer" them, neither would it be sound for any authority to not seek to agree how that unmet need is accommodated, where there are practical opportunities to do so, and consistent with achieving sustainable development.

To that end, there are many suitable and deliverable options for growth across the South Hampshire authorities, including sites indicated as in principle suitable within Strategic Housing Land Availability Assessments, which would be consistent with sustainably meeting the unmet needs that exist.

The Test Valley Draft Local Plan

The emerging Local Plan sits within the context of the above national policy which requires consideration to be given to the wider unmet need of the neighbouring authorities, which given the agreement under the PfSH SoCG, includes those authorities of the wider PfSH sub-region.

At para 2.20 the emerging Local Plan acknowledges that the PfSH has undertaken a 'Broad Areas of Search' exercise, indicating that the progression of the broad areas of search identified through this process to be decided upon by the individual Local Planning Authorities through the preparation of their respective Local Plans. The 'Broad Areas of Search' exercise is a high level assessment with an initial aim of identifying areas which, in relation to the metrics applied for that assessment and for the focussed geography which it addresses, are 'potentially' the most sustainable locations for growth at the sub-regional level.

The areas identified within that assessment are therefore a starting point for the PfSH to identify potential sites across the sub-region and do not rule out or inhibit the delivery of other areas of growth that individual Local Authorities within the PfSH identify as being suitable to deliver housing. Indeed, it is likely necessary that there will need to be other sites and locations identified across the area because even with those 'Broad Areas of Search' and the capacity provisionally identified for them, there remains unmet needs across the PfSH area of around 2,000 homes.

We would draw attention to the fact that two of the identified locations within the broad areas of search exercise are located in Test Valley:

- 1 East of Romsey; and
- 2 South-West of Chandler's Ford.

The proposed strategic housing allocation 'Land South of Ganger Farm' (340 homes) is located on greenfield land East of Romsey, so falling with the description of the broad location. Similarly 'Land at Velmore Farm' (1,070 homes) is located on greenfield land South-West of Chandler's Ford. However, as per Local Plan Para 4.137, both of these sites are allocated to meet Test Valley's residual housing requirement (i.e. the authorities own needs) and not the wider unmet need of South Hampshire. Further, their proposed allocation would appear to erode the ability and capacity of these area to act as a broad area of growth to meet the wider unmet need, as envisaged by the 'Broad Areas of Search' exercise.

As previously identified, Para 11b of the NPPF requires strategic policies to consider housing needs that cannot be met within neighbouring areas. We would suggest that Test Valley is in no way absolved of its policy requirement to consider additional sites for housing to assist the wider unmet need position across the PfSH unless it reaches agreement with those PfSH authorities that those unmet needs can most sustainably be met elsewhere.

The emerging Local Plan acknowledges the extent of the unmet need issue, such that the shortfall across the sub-region is c.12,000. This is a significant level of unmet need that is incumbent on the authorities across South Hampshire to address. But the draft Plan makes no provision, nor allowance, for those unmet needs.

Para 3.62 acknowledges that *“National policy is clear where unmet housing exists, neighbouring authorities need to help provide for these housing needs”*. However, whilst the plan agrees with the need to aid neighbouring authorities the Plan continues that *“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.”* The Plan goes on (para 3.63) to intimate any unmet needs could be addressed via a future review.

We consider this to be an incorrect and unsound approach. The intimation that ‘unmet need’ only becomes crystallised and tangible for planning purposes once Local Authorities proceed with their own local plans to evidence the levels of unmet need:

- 1 Is not consistent with the NPPF test of soundness for Local Plans which requires (para 35c) for plans to be effective that cross-boundary strategic matters have been dealt with rather than ‘deferred’;
- 2 Is inconsistent with clear evidence within the PfSH Spatial Position Statement that the unmet needs exist and are already accruing; and
- 3 Belies the fact that in South Hampshire an unmet housing need has been established for many years (e.g. the previous PUSH Spatial Position Statement from 2016 identified unmet needs of more than 7,000 homes at that point), but has wholly failed to be properly grappled with.

The issue of the wider unmet need needs to be addressed collectively through the emerging local plans across the Hampshire area, and not left to the chance of a local plan review. That is for Test Valley to address with its neighbouring authorities, including Winchester, as to where suitable and sustainable capacity exists to meet the wider housing needs of South Hampshire. Without that – and absent work which specifically indicates why it is impractical or unsustainable for Test Valley itself to meet those unmet needs as per NPPF para 35 – Test Valley’s own local plan cannot be sound.

In our view the area around Micheldever Station provides one such solution to this problem. It would meet the needs of Winchester and Hampshire more widely, and specifically address unmet needs by enabling existing large-scale planned growth at North Whiteley and West of Waterlooville (both now hypothecated by Winchester City Council to subsidise Winchester Districts own needs) to return to their original function of meeting the unmet needs of South Hampshire. Test Valley Council will also be aware that Basingstoke & Deane District Council is currently consulting on a Local Plan which includes a Garden Village proposal at Popham Airfield (adjacent to our clients land at Micheldever Station) which further highlights the intrinsic suitability of the location to support growth.

Summary and Conclusion

As set out above, we note that the emerging Local Plan is cognisant of the wider unmet need that exists across South Hampshire.

However, it is considered that the approach of the emerging plan to this unmet need as drafted is unsound. It is not adequately addressed and is seemingly ‘deferred’ by the Plan, contrary to NPPF para 35. As such, we consider that the local plan is not robust, positively prepared or effective. Further work



needs to be undertaken by Test Valley with its neighbouring authorities to establish how the full unmet needs of South Hampshire will be met.

Yours faithfully



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