

**Test Valley Borough Council
Draft Local Plan 2040**

Regulation 18 – Stage 2

April 2024

Contents:

- 1. Introduction**
- 2. Strategic Policies**
- 3. Detailed Matters and Development Management Policies**

1. Introduction

- 1.1. These representations have been prepared by Victoria Land, in respect of the current consultation on the Draft Test Valley Local Plan 2040.
- 1.2. These representations are in relation to interests held within the Local Plan area.
- 1.3. Our comments are predominantly in relation to detailed matters and development policy proposals.
- 1.4. At the outset we note that this consultation is at an early stage of the plan – making process. The absence of any comments in these representations should not be read as confirmation there is agreement with the text in the consultation document. Similarly, the representations set out below are subject to refinement and evolution as the Council develops its policy and publishes its evidence base.
- 1.5. In particular it is important that the plan is tested for viability purposes to ensure it is deliverable, with policy requirements refined accordingly depending on the outcome of this assessment work. In this context, we make the following representations:

2. Strategic Policies

Spatial Strategy Policy 1 (SS1) - Settlement Hierarchy

- 2.1. We support the recognition that a range of settlements will need to contribute to accommodating growth. Whilst the importance of locating growth in sustainable locations is recognised, this needs to consider all elements of sustainability and the role that new development can play in enhancing and maintaining the sustainability of all levels of settlements for a variety of tenures.
- 2.2. We support the inclusion of a settlement hierarchy, which ensures consistency in approach. However, we are concerned about the overreliance on the concentration of housing allocations across only 6 locations within the Borough. Of these, only two of the settlements have allocations for less than 100 dwellings, with Andover for example expected to deliver 2,290 over the plan period.
- 2.4. We welcome the opportunity for Settlements at Tiers 2 -4 to deliver appropriate sites for housing in suitable locations. Each Tier has a different level of facilities and proportional growth across these locations should be supported. Distribution of new housing should be delivered across settlements of varying sizes and villages should be encouraged to deliver a proportionate level of growth. This will ensure all housing needs across the district are met.

Spatial Strategy Policy 2 (SS2) Development in the Countryside

2.6 Whilst we welcome the acknowledgement that different Tiers can accommodate arising scales of development, this policy is somewhat at odds. In sustainable locations where the level of services and facilities can support further growth, the policy should permit unallocated sites to come forwards if they meet a specific need not being delivered.

2.7 We note that there are no policies addressing the increasing need for specialist housing for the elderly and where strategic allocations are unable to provide this, well connected, edge of settlement locations can meet this need. We therefore, suggest that Specialist housing is permitted on unallocated sites.

Spatial Strategy Policy 3 (SS3) Housing Requirement & Spatial Strategy Policy 4 (SS4) Rural Housing Requirement

2.8 The Plan confirms that it does not address the anticipated unmet need from neighbouring authorities. We consider this position to be unsound.

2.9 The SHMA (2022) identifies that the number of people aged 65 and over is expected to increase by 43% across the Borough to 2040. Based on this evidence they highlight the need for specialist housing for the elderly and identify the range of housing models that are available and required.

2.10 Only one of the Local Plan allocated sites specifically includes the provision of specialist housing, with 44 C2 extra care units proposed. The only other potential for delivery is contained within policy HOU5, which requires major developments to consider the provision of specialist housing. This does not give certainty of delivery and again, would concentrate this specialist use to only a few locations, where the need is across the borough. As there is no certainty of the delivery of specialist housing, the housing requirement is not sufficient to meet all the needs identified for the borough over the plan period and the numbers proposed are likely to only deliver standard housing.

Policy 6 (SS6) Meeting the Housing Requirement

2.11 As stated above, the strategy relies too heavily on a few, large scale housing sites across only 6 locations. As a result the housing trajectory is skewed and the majority of the housing supply is likely to be delivered towards the end of the plan period. Should there be any problems with the deliverability of these sites, the plan will fail to deliver a consistent supply of housing.

2.12 It is considered that the plan should include the provision of a range of sites of varying scales to ensure deliverability across the plan period. The NPPF requires at least 10% of the housing requirement to be identified on sites no larger than 1 hectare. The local plan relies on windfall sites to deliver this provision. This is not the intention of the NPPF and is unlikely to deliver the number of homes required under the NPPF.

2.13 As stated above there is little provision for the range of specialist housing that is needed across the borough in all locations.

3. Theme Based Policies

Policy HOU1: Affordable Housing

- 3.1- We recognises the importance of affordable housing provision and the need for this to be considered through the plan making process in the context of up-to-date and detailed local evidence of housing need and viability. A balanced approach should be taken in setting the percentage requirement for affordable housing, reflecting evidence of infrastructure costs and values associated with the wider delivery of the plan.
- 3.2- In addition it will be important that the Plan is tested for viability purposes to ensure it is deliverable, with the policy requirements refined accordingly depending on the outcome of any assessment work.

Policy HOU3: Rural Exception Affordable Housing

- 3.3- The NPPF confirms that Rural Exception Sites are to deliver housing to meet local needs in areas or on sites that would not otherwise deliver housing. The need should not be restricted to the immediate parish as stated in part (a) (i-iii). It is commonplace for cascade policies to apply, so that local need is accommodated first. However, if a need remains district wide, if a suitable site has been identified, it should be able to meet unmet needs across the district.

Policy HOU5: Provision of Housing to Meet our Needs.

- 3.4- As acknowledged above, the Plan does not adequately address the need for specialist housing. Major development is only asked to consider provision which means there is no certainty of delivery of enough housing to meet all needs. In addition, limiting provision to major developments reduces the locations where provisions will be made, rather than addressing the Borough wide need.

- 3.5- In light of the above, it would be appropriate for policies to allow specialist housing to come forward on unallocated sites, on the edge of sustainable locations. This will assist with meeting this need and a market led approach will ensure that the type of housing is provided for the relevant need in a given location.