



Planning Policy
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

Our ref: AT/CN

28 March 2024

Dear Sir/Madam,

Re: Test Valley Borough Council Local Plan Publication 2020-2040 Public Consultation (Regulation 18) Stage 2 Representations.

This response is submitted by Strutt and Parker on behalf of Johanna Halford in response to the Test Valley Borough Council's (TVBC) Regulation 18 Stage 2 consultation. These comments are made further to the representations previously made for two separate sites during the 2021 call for sites process: Site 107 – Coolers Farm Field, Broughton; and Site 127 – Old Donkey Field, Broughton. Our comments concern the following draft policies with the Regulation 18 Stage 2 consultation document:

- *Spatial Strategy Policy 1 (SS) – Settlement Hierarchy*
- *Spatial Strategy Policy 2 (SS2) – Development in the Countryside*
- *Spatial Strategy Policy 3 (SS3) – Housing Requirement*
- *Spatial Strategy Policy 4 (SS4) – Rural Housing Requirement*
- *Spatial Strategy Policy 5 (SS5) – Neighbourhood Development Plan Housing Requirements*
- *Policy HOU7 – Self-build and Custom Build Housing*

Spatial Strategy Policy 1 (SS1) – Settlement Hierarchy

This policy identifies Broughton as a Tier 3 settlement where new development will be brought forward through windfalls, rural affordable housing sites, replacement dwellings, community-led development, small business uses, re-use of buildings, and renewable energy development. Tier 3 settlements are not expected to accommodate Strategic housing or employment allocations as outlined in draft policies SS6 (Meeting the Housing Requirement) and SS8 (Meeting Employment Land Requirement).

The National Planning Policy Framework (NPPF) revised version published in December 2023 is clear that the overall aim in delivering a sufficient supply of homes should be to meet as much of an area's identified housing need as possible

(Paragraphs 60 and 63), including an appropriate mix of housing types for the local community and that the size, type and tenure of housing for a wide range of groups in the community should be assessed and reflected in planning policies. The importance of the development of small and medium sized sites is reflected within Paragraph 70 of the NPPF which states:

Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;*

We would question how suitable housing sites can be brought forward in villages such as Broughton without plan-led allocations. Tier 3 does list 'Windfall' sites as one option for bringing development forward. However, in a village with a tight settlement boundary such as Broughton there will be limited windfall opportunities for new housing. In the absence of an advanced or adopted Neighbourhood Plan in Broughton there are very few opportunities for new market and affordable housing to be brought forward, and likely fewer each year given the proposal to remove settlement boundaries from nine Tier 4 villages.

The need for new housing in small – medium sized villages is an acute issue which requires a strategic solution. The Broughton Parish Housing Needs Survey report (October 2022) found that 50.25% of respondents felt there is insufficient housing in the parish for people to access. 189 respondents out of the 211 surveyed confirmed they would support a development of some kind in the parish over the next 15 years. This survey highlighted that shared ownership housing was of most need in the borough at 48.76% followed by open market sale at 37%. This survey recorded that 98% of the respondents lived within the parish indicating that the shortfall in new homes is an acute issue for residents of Broughton.

We recommend alterations to the approach to development within the settlement hierarchy to ensure a small number of suitable and available sites in each village can be allocated for new housing. This could be achieved by the addition of 'non-strategic allocations' as an additional form of acceptable development within Tier 3 settlements. This amendment would support the delivery of much needed housing in small and medium sized villages within Tier 3. In addition, this would be appropriate compensation for the removal of settlement boundaries from Tier 4 villages.

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

Spatial Strategy Policy Two concerns the development of sites outside of settlement boundaries. This policy states that development will only be permitted if it accords with emerging policies CL5, HOU2, HOU3, HOU8-12 and EC1-4 or policies in made Neighbourhood Development Plans.

- *CL5 – Renewable and Low Carbon Energy*
- *HOU2 – Community Led Development*
- *HOU3 – Rural Exemption Affordable Housing*
- *HOU8 – Meeting the needs of Gypsies, Travellers and Travelling Showpeople;*
- *HOU9 – Gypsies, Travellers and Travelling Showpeople;*
- *HOU10 – Occupational Accommodation for Rural Workers in the Countryside;*
- *HOU11 – Existing Dwellings and Ancillary Residential Development in the Countryside*
- *HOU12 – Replacement Dwellings in the Countryside.*

We consider this policy should provide more opportunities for small scale residential development adjacent to settlement boundaries. This could be achieved by the addition of a new policy supporting development on sites outside of identified settlement boundaries where schemes are: 1) *less than 10 dwellings*; 2) *located adjacent to the settlement boundary and contiguous with the existing form of development*; and 3) *demonstrated to be sustainable, including reference to the settlement hierarchy*.

As the plan is drafted, villages without a Neighbourhood Plan and a co-ordinated group to bring forward Community Led Development will have limited opportunities to enable new housing within their village.

Spatial Strategy Policy 4 (SS4) – Rural Housing Requirement

Draft policy SS4 provides that rural housing will be brought forward by communities to meet a minimum housing requirement of 542 homes over the plan period with 260 homes in the northern TV area and 282 homes in the Southern TV area. The guidance notes supporting policy SS4 state that there are eight made neighbourhood plan areas, with only three located in the southern area. Overall, only two plans in the whole borough include housing allocations (Charlton – 50 homes and King's Somborne – 41 homes).

Strutt and Parker support the rural housing area requirement and proposed distribution. However, with only one made neighbourhood plan that allocates housing in the southern area it is difficult to understand how the 282-home requirement will be effectively met without small scale housing allocations within key villages. This should be addressed by small-scale allocations for new housing included in small and medium sized villages.

Spatial Strategy Policy 5 (SS5) – Neighbourhood Development Plan Housing Requirements

Draft policy SS5 states that the three Neighbourhood Development Areas in the Southern TV area will be required to accommodate 70 dwellings towards meeting the rural housing requirement. This figure is in addition to the rural area requirement (282 units) and the windfall allowance of 352 dwellings. This figure of 282 is unlikely to be achievable within the constrained Tier 3 villages, further exacerbated by the removal of settlement boundaries for Tier 4 villages. Whilst we support the council expressly seeking housing allocations within neighbourhood plan, the unrealistic expectations on new housing from the sources identified will require a strategic, plan-led approach to new housing in Tier 3 villages outside of the neighbourhood planning system.

Policy HOU7 – Self-build and Custom Build Housing

Strutt and Parker would support the provision of 5% serviced plots for custom and self-build purposes on sites of 100 homes or more. However, we would question whether this is sufficient to meet the chronic under delivery of serviced plots for custom and self-build housing within the borough since the enacting of the Self-build and Custom Housebuilding Act 2015 (as amended).

This act places a legal duty to provide serviced plots to meet the demand on the councils register and has been further strengthened through the Levelling Up and Regeneration Bill (2023). Whilst, the Test Valley Strategic Housing Market Assessment (SHMA) does highlight the importance of custom and self-build provision, noting an under provision of serviced plots in the borough, the Council will need a more pragmatic solution to meet the shortfall in plots as outlined in **Figure 1**.

Policy HOU7 would also be applicable to seven strategic allocations outlined in SS6 (over 100 dwellings). The council currently have a shortfall of 191 units and this draft percentage policy would equate to 244 serviced plots over the development plan period (2020 – 2040). These 244 plots are the maximum number that could be generated through this percentage policy and is likely to be decreased due to various unforeseen construction or development viability factors.

These 244 plots would also be required to meet future demand for serviced plots. A review of the Right to Build Register Monitor issued annually from DLUHC indicates that there were 30 new registrants on the Test Valley council database in the 7th base period (2021/22) and the previous base period recorded 53 new entrants (2020/21). This would equate to between 480 – 848 new entrants onto the Council's database over the remaining 16-year plan period.

Therefore, even with additional plots provided through windfall sites, it appears highly unlikely that draft policy HOU7 could meet both the unmet demand for serviced plots in the borough and the demand arising from new entrants to the register.

Base Period	Individuals and groups on councils register	Planning permissions granted for serviced plots	Shortfall
1	24	0	-24
2	35	0	-35
3	20	30	+10
4	41	0	-41
5	35	15	-20
6	53	1	-52
7	30	1	-29
			Cumulative shortfall
			-191

Figure 1: Analysis of councils duty with regard to the provision of serviced plots for CSB

An appropriate solution would be including site specific allocations for custom and self-build housing within the Local Plan. This has been brought forward in other local plans successfully and ensures a variety of sites can come forward which are not reliant on major housebuilders. Stratford-upon-Avon's emerging Site Allocation Plan includes 12 sites, totalling over 100 units which will be specifically allocated for self and custom housebuilding (Draft policy SAP.6 – Self and Custom Housebuilding). In addition, the Bristol City Council allocates 115 units over four sites within the emerging local plan published November 2023. All of these sites are solely allocated for CSB purposes and considered to be an effective way to ensure delivery and meeting these councils' legal duty.

In summary, we would strongly recommend that the council to look for additional solutions to meet the unmet demand for serviced plots within the borough such as site-specific allocations around small-medium sized villages. We have promoted a site within the borough suitable for market and custom / self-build housing (127 – Donkey field) which may provide an appropriate solution, in addition to other suitable and available sites highlighted in the SHLAA.

Development site opportunities

Test Valley council have identified a 282 home requirement with the southern housing market area of the borough. To meet this need, our client is committed to bringing the following sites forward for housing (both are which were favourably assessed as part of the SHLAA). These sites would be appropriate for non-strategic development within Tier 3 settlements.

- 1) **Coolers Farm Field, Horsebridge Road, Stockbridge, SO20 8BN** – This site a 1.25ha former agricultural site adjacent to the settlement area of Broughton. This site is located outside of the Broughton Conservation Area and includes a direct existing access point onto Horsebridge Road via Coolers Field. An indicative site layout is attached as **Appendix A**. This site has capacity for 19 units as was listed as available and deliverable in the 2021 SHLAA (site ref: 107# Coolers Farm field)

- 2) **Old Donkey Field, Horsebridge Road, Stockbridge, SO20** – This site is a 0.3ha former agricultural site adjacent to the settlement area of Broughton. This site is located outside of the Broughton Conservation Area and fronts onto Horsebridge Road. An indicative site layout is attached as **Appendix B**. This site has capacity for 5 units as was listed as available and deliverable in the 2021 SHLAA (site ref: 127# Old Donkey Field). We consider this site has potential for a self-build only scheme.

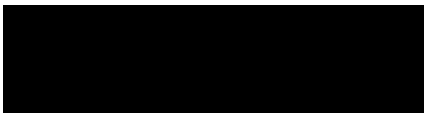
Summary

Strutt and Parker considers that the local plan should seek alternative solutions to addressing the housing need within small-mediums sized villages such as Broughton, and the plan as drafted does not offer sufficient solutions to bring forward suitable and available sites highlighted within the Council's latest SHLAA and evidence base for the emerging local plan.

Our client is committed to bringing forward sites 107 and 127 (2021 SHLAA) which are both suitable and available (as confirmed by the council) and would assist in boosting housing supply in villages such as Broughton and meeting specialist housing need such as for the purposes of self and custom housebuilding.

We look forward to reviewing the Council's response to these representations in due course.

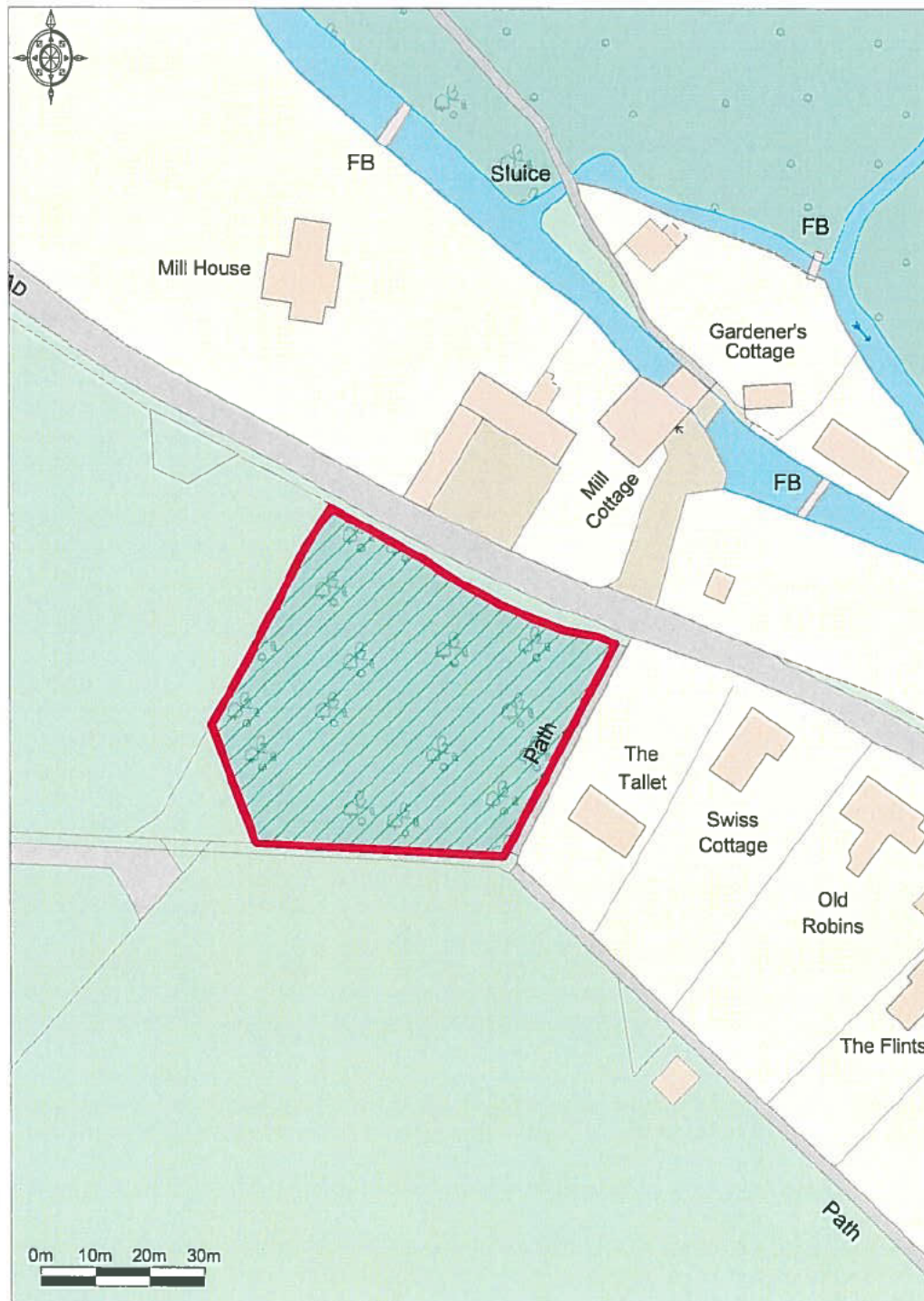
Yours sincerely,



Andrew Taylor BA (Hons) MPLAN MRTPI
Senior Planner

Enc. Appendix A- Indicative Site Layout – Coolers Farm
 Appendix B- Site Location Plan – Old Donkey Field

Old Donkey Field [REDACTED]
Site Location Plan - Scale @ 1:1250



Coolers Farm Field, [REDACTED]

Indicative Site Layout

