

Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 2

COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 2 document for public consultation. This consultation document sets out a vision for Test Valley up to 2040, objectives for achieving this vision, our development needs alongside allocations for residential and employment development and theme-based policies.

The consultation period runs from Tuesday 6th February to noon on Tuesday 2nd April 2024. Please respond before the close of the consultation period so that your comments may be taken into account.

You can respond to our consultation by filling out the form below. This form has two parts:

Part A: Your Details

Part B: Your Comments (please fill in a separate sheet for each comment you wish to make)

Further information can be found on our website at:

www.testvalley.gov.uk/localplan2040

Once the form has been completed, please send to planningpolicy@testvalley.gov.uk below by **noon on Tuesday 2nd April 2024**.

Following receipt of your comments from, we will keep you informed of future consultation stages unless you advise us that you want to opt out of such communication.

If you are unable to send via email, please send a postal copy to our address below.

Contacting us

Planning Policy and Economic Development Service
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SP10 3AJ

Tel: 01264 368000

Website: www.testvalley.gov.uk/localplan2040

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Dr	First Name*	Chris
Surname*	Lyons		
Organisation* (If responding on behalf of an organisation)	SLR Consulting on behalf of D. R. Busk		

Please provide your email address below:

Email Address*	
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Alternatively, if you don't have an email address please provide your postal address.

Address*			
	Postcode		

If you are an agent or responding on behalf of another party, please give the name/ company/ organisation you are representing:

SLR Consulting on behalf of D. R. Busk
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Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/ postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment.

All representations and related documents will be held by the Council until the Local Plan 2040 is adopted and the Judicial Review period has closed and will then be securely destroyed.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are

available on our website here:
<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

Part B: Your Comments

Please use the boxes below to state your comments. This includes one box for general comments and another for specific comments related to an area of the Local Plan.

Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

General
Please refer to supporting representation.

For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible. Please use the box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

Paragraph Ref	Specific Comments
	<p>Please refer to supporting representation.</p>

What happens next?

All valid responses received within the consultation period will be acknowledged and you will be given a reference number. Please quote this reference number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent directly to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.



Test Valley Borough Council Draft Local Plan 2040

Regulation 18 (Stage 2) Consultation March 2024

D. R. Busk

Prepared by:

SLR Consulting Limited



SLR Project No.: 433.000087.00001

26 March 2024

Revision: 1

Revision Record

Revision	Date	Prepared By	Checked By	Authorised By
1	22 March 2024	LB	NB	
2	26 March 2024	LB	CL	CL
	Click to enter a date.			
	Click to enter a date.			
	Click to enter a date.			

Basis of Report

This document has been prepared by SLR Consulting Limited (SLR) with reasonable skill, care and diligence, and taking account of the timescales and resources devoted to it by agreement with D. R. Busk (the Client) as part or all of the services it has been appointed by the Client to carry out. It is subject to the terms and conditions of that appointment.

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1.0 Introduction

- 1.1 This representation is prepared by SLR Consulting on behalf of our client, D. R. Busk, in response to the Test Valley Borough Council (TVBC) Draft Local Plan 20240 Regulation 18 Stage 2 Consultation.
- 1.2 D. R. Busk controls various land parcels in Houghton, with three of particular relevance to this representation and the Local Plan Consultation, as listed below and set out in more detail in section 4:
 1. Land West of Rose Cottage
 2. Houghton Allotments
 3. Land Rear of Stevens Drove
- 1.3 This representation follows previous representations made on behalf of D. R. Busk, including the Issues and Options consultation (2018), Refined Issues and Options Consultation (2020) and the Regulation 18 Stage 1 consultation (2022). Many of the comments made in these representations still apply and therefore should be read alongside this representation.
- 1.4 Land West of Rose Cottage and Land Rear of Stevens Drove have also been promoted through TVBC's Call for Sites, which is discussed further in section 4.
- 1.5 This representation will focus on Chapter 3 of the draft Local Plan, particularly the spatial strategy, settlement hierarchy and housing needs, as well as drawing upon the relevant evidence base.
- 1.6 The representation will conclude that the draft Local Plan should be doing more to facilitate housing and affordable housing delivery, particularly in the rural areas in the heart of the Borough such as Houghton, to meet local need and address the socio-economic issues rural areas face. It also concludes that the proposed settlement boundary of Houghton should not only remain, but be extended, as should its position in tier 3 of the settlement hierarchy.



2.0 TVBC Housing Need and Requirements

- 2.1 We are supportive of the draft Local Plan's vision which, by 2040, seeks to provide access to good quality homes that will meet a range of needs and aspirations, including affordable housing.
- 2.2 Spatial Strategy Policy 3 (SS3) confirms the housing requirement for the Borough is a minimum of 11,000 homes delivered over the plan period of 2020 to 2040 with an annual average requirement of 550 homes. We are supportive of the term 'minimum' which is in line with the NPPF and PPG, which explains the outcome of the standard method is an advisory starting-point for establishing housing requirement for the area.
- 2.3 The draft Local Plan proposes to split the 11,000-home requirement into Northern and Southern Test Valley, with 57% proposed for the former and 43% proposed for the latter. The draft Local Plan states *"the proposed split of the housing requirement between the two HMAs remains and this will continue to be based upon the amount of population within each HMA¹"*. It is therefore apparent the split is based on population alone and does not take into account other factors, such as affordability (which is much worse in Southern Test Valley), designations and constraints and the need to disperse housing into rural areas as well. The draft Local Plan should be more wide-ranging in its assessment, seeking to facilitate improvements in the Borough as opposed to following the existing trend. Houghton sits near the boundary between the two HMAs and so development in Houghton would be able to serve both HMA areas.

Unmet Housing Need

- 2.4 We are concerned that the draft Local Plan states that there are no exceptional circumstances that exist to justify increasing the local housing requirement. Meeting unmet housing need from neighbouring authorities can be one such exception.
- 2.5 The draft Local Plan admits that TVBC received a formal request from Havant Borough Council to help meet their unmet housing need. In addition, the Partnership for South Hampshire's (PfSH) latest Spatial Position Statement (December 2023) highlights that there remains a shortfall of 11,771 units across the PfSH Authorities. New Forest has the biggest deficit, totalling 5,652 units. Given the New Forest District plan was adopted relatively recently (July 2020), as well as 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.
- 2.6 The fact that TVBC state there is no 'clear evidence' of the level of unmet housing need in neighbouring authorities is quite clearly incorrect given the evidence summarised above. As a member of PfSH, TVBC therefore have an opportunity to help address some of this need, being significantly less constrained than many other PfSH Authorities.
- 2.7 Therefore, it is considered the draft Local Plan does not sufficiently demonstrate TVBC have undertaken their duty to cooperate with neighbouring authorities or thoroughly reviewed whether they can assist with the unmet housing need in the area. This goes against paragraph 61 of the NPPF which states *"In addition to the local housing need figure, any needs that*

¹ Paragraph 3.68



cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”.

- 2.8 As a result, the draft Local Plan in its current form is not positively prepared, which as the NPPF explains, means *“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”².*

Affordable Housing

- 2.9 The draft Local Plan notes there are affordability issues in the Borough and states *“the combination of relatively high house prices and rents compared to household income levels in the Borough, means that a significant proportion of households are in housing need as they are unable to access housing to meet their needs through the private housing market, and the private rented sector can also be difficult to access”³.*
- 2.10 The Strategic Housing Market Assessment (SHMA) (2022) has assessed the affordable housing need as 437 affordable homes for rent and 215 affordable home ownership per year, meaning a total annual need of 652 affordable dwellings. The need for affordable housing has also risen by almost 50% since the last SHMA (2013), when the total annual need for affordable homes for rent was 292, therefore it is evident the need for affordable housing in TVBC is an increasingly significant and worsening issue which must be addressed.
- 2.11 The draft Local Plan appears to simply acknowledge the affordable housing supply issue but has not gone far enough to address it. A successful method of facilitating greater affordable housing delivery is by increasing the overall housing requirement, particularly in the rural areas, which will allow additional affordable housing to come forwards through market-led developments. This is expressed in the PPG which states *“an increase in the total housing requirement included in the plan may need to be considered where it could help deliver the required number of affordable homes”⁴.*
- 2.12 Turning to rural areas and Houghton specifically, according to data from Zoopla⁵, the average house price in Houghton is £1,478,125, which highlights the significant unaffordability of the village. Using the latest median earnings for the Borough of £38,345 obtained from ONS⁶, this would mean the average Houghton house price to median Borough earnings ratio would be 39. In comparison, the average Borough-wide house price to median Borough earnings ratio is 9.39. This demonstrates the vast majority of residents in the Borough would not be able to afford a house in Houghton.

² NPPF paragraph 35

³ Paragraph 5.352

⁴ Paragraph 008 Reference ID: 67-008-20190722

⁵ https://www.zoopla.co.uk/house-prices/hampshire/houghton/?new_homes=include&q=houghton+stockbridge&identifier=uk&view_type=list
[Accessed 22/03/2024]

⁶ <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022> [Accessed 25/03/2024]



- 2.13 In addition, waiting times for affordable housing are extremely high. The Hampshire Homes Choice website states there is an average wait of 193 weeks for a property in Houghton, with only 10 being available⁷.
- 2.14 It is therefore critical that housing delivery is increased within the rural areas, including Houghton, to address the severe and worsening affordability issues. Spatial Strategy Policy 4 (SS4) goes some way in setting out the rural housing requirement – a total of 542 homes, which equates to just 5% of the Borough-wide requirement. However, the policy should be allocating higher minimum housing numbers to address the current socio-economic issues in these areas. This will not only assist in reducing the barriers to rural home ownership, but also facilitate sustainable growth in the rural areas of the Borough to ensure they do not get left behind.

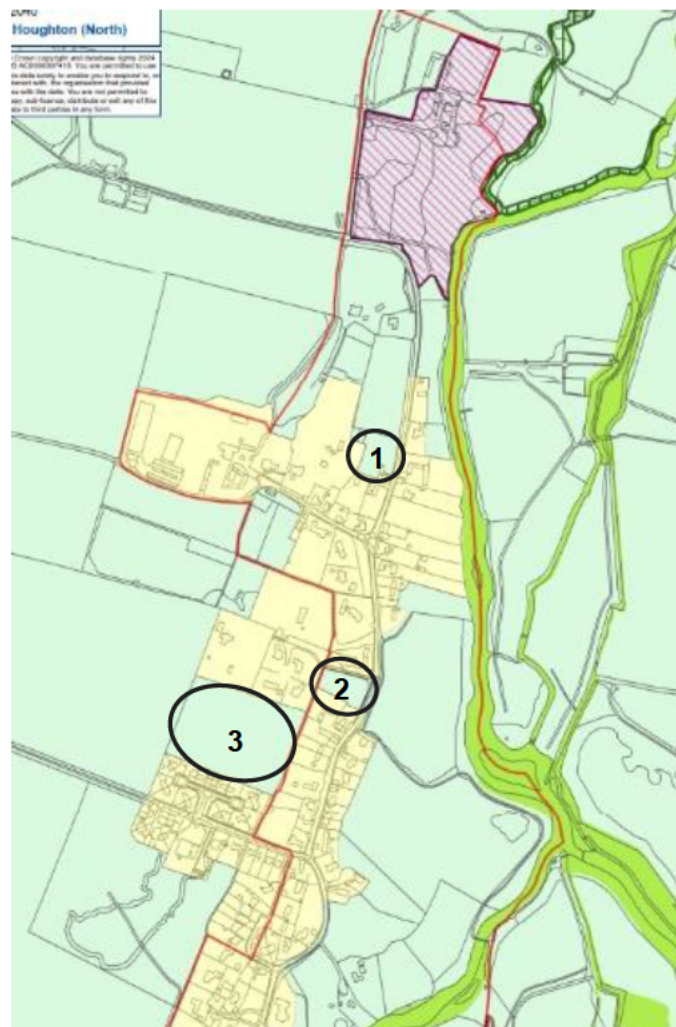
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<https://www.hampshirehomechoice.org.uk/AverageWaitingTime/Results?AverageWaitingTimePeriods=1825&AverageWaitingTimeLocation=2&Sender=NavigationBarPanel&#map-link-40> [Accessed 21/03/2024]



3.0 Settlement Hierarchy and Boundaries

- 3.1 Spatial Strategy Policy 1 (SS1) sets out the settlement hierarchy and is split into 4 tiers, with tier 1 comprising of Andover and Romsey, the largest settlements in the Borough, and tier 4 comprising of open countryside and 'all other settlements'.
- 3.2 In the adopted Local Plan (2016), Houghton has a settlement boundary and falls into the 3rd tier ('rural villages'). However in this draft Local Plan, it is proposed to remove the settlement boundary from Houghton completely and move the village into tier 4. We strongly object to this proposed amendment.
- 3.3 The draft Local Plan asks⁸ whether the tier 4 settlements should have a settlement boundary and be in tier 3, and if so, potential settlement boundaries for these settlements (based on the existing settlement boundaries in the Adopted Local Plan 2016, but reviewed to reflect the proposed methodology) have been shown on the Policies Map. In terms of Houghton specifically, not only do we consider the proposed settlement boundary and tier 3 status should remain, but also the proposed settlement boundary should be expanded. Below is an extract of the draft Houghton Policy Map, with the proposed settlement boundary shaded in yellow, and our mark-up in black showing where we consider the boundary should be extended.



⁸ Paragraph 3.43



- 3.4 Including all three sites within the settlement boundary would be a simple 'rounding off' to the village with none of the sites protruding beyond existing built form.
- 3.5 The Settlement Boundary Review (January 2024) differentiates between settlements with a boundary (tiers 1-3) and without a boundary (tier 4). Table 1 explains tier 1-3 settlements are considered to be of an appropriate scale and with access to a range of facilities, but that settlements within tier 4 are located in open countryside and comprise small and or dispersed settlements with limited facilities and lack of good accessibility to facilities such as schools, shops and community facilities.
- 3.6 Houghton is located close to Stockbridge, which is a key service centre in the adopted Local Plan and a tier 2 settlement in the draft Local Plan and is an important destination for services and facilities. The Settlement Hierarchy Assessment Paper (February 2024) describes Stockbridge as *"the centre of the rural Borough and has access to all of the key facilities and a good range of other facilities and services that the surrounding rural communities rely on"*⁹. Also, the draft Local Plan states *"Stockbridge at the centre of Test Valley and the rural area, on the River Test, acts as a centre for many of our more rural communities"*¹⁰. In addition, Houghton itself is served by a number of local services and facilities, including The Boot Inn pub, bakery, local café provided within Houghton Lodge, a yoga studio, a small number of local shops and a Church.
- 3.7 The draft Local Plan states *"Chilworth does score lower than the other settlements in this tier. However the role and function of Chilworth due to its proximity to the University of Southampton Science Park and neighbouring settlement of Eastleigh, Chandler's Ford and Southampton, justifies it being in Tier 2. It benefits from accessing the facilities and services at these neighbouring settlements"*¹¹. The same principle should therefore be applied to Houghton, with its proximity to Stockbridge and ability to access its services and facilities. The draft Local Plan explains that *"the more sustainable settlements are located in the higher tiers of the hierarchy as residents are able to access a greater range of services and facilities more easily without the need to travel as far by car"*¹². Therefore to ensure consistency in the settlement hierarchy assessment, Houghton should remain in Tier 3.
- 3.8 There are also public rights of way and footpaths in the village which provide important and attractive recreational routes for local residents. The no. 16 and 54 bus stops at a number of points in the village, which provide access to Stockbridge, as well as larger settlements such as Romsey and Winchester. Houghton therefore has good access to services and facilities and should remain a tier 3 settlement and clearly does not have the characteristics of a tier 4 category as described in the Settlement Boundary Review.
- 3.9 Appendix 1 of the Settlement Boundary Review sets out the criteria of what should be included and excluded from settlement boundaries. Areas that are to be included in boundaries are *"uses and buildings that relate better to the built form of the settlement than the countryside"* and *"boundaries are to be drawn around existing identifiable boundaries on the ground such*

⁹ Paragraph 5.9

¹⁰ Paragraph 3.75

¹¹ Paragraph 3.36

¹² Paragraph 3.22



as buildings and appropriate curtilages". Areas to be excluded are *"uses and buildings that relate better to the countryside than the built form of the settlement for example:*

- *Outlying development or small pockets of development that are clearly detached from the settlement*
- *Church yards*
- *School playing fields*
- *Public Open Space, including recreation grounds and allotments*
- *Farm complexes*"

3.10 In terms of the proposed Houghton settlement boundary as shown in the extract above, our marked-up sites are all clearly well-related both physically and functionally to the built form of the settlement and are not outlying or detached from the settlement, with existing development surrounding all three sites.

3.11 In addition, the marked-up site no.2 (known as Houghton Allotments, discussed in section 4), is currently included in the settlement boundary in the adopted Local Plan but is now being proposed for removal as shown in the extract above. The Settlement Boundary Review states the reason is due to the allotments comprising *"open land free from urban influences which is appropriate to remove from the settlement boundary"*. This is not a justification for removing the site and is not accurate. The site is clearly surrounded by existing development and is not open land, with structures relating to the allotment use on site. Also, it is noted that a criterion for exclusion as listed above is 'public open space including allotments', however, as previously emphasised to TVBC at length, this site is privately owned land and is **not** a public allotment, therefore does not fall into this category. The landowner currently allows the land to be used by local residents, but this is a benefit to a limited number of individuals and not a right. The allotments are not subject to any formal designation and could be closed at any time should the owner wish to do so. The site is privately owned and is in full control of the landowner, the site is not owned by the Council or Parish and does not form a statutory site under the Allotments Act 1925, hence does not benefit from special protection. There is no justification given in planning terms as to why this site should be removed and it makes a perfect in-fill site in a village in terrible need of more housing.

3.12 The exclusion of these sites is completely illogical and does not align with TVBC's own methodology. Therefore, not only should the settlement boundary and tier 3 status of Houghton remain, but the proposed settlement boundary should also be amended and expanded accordingly as described above. This will allow for modest, organic growth of the village within the settlement boundary, where there is a presumption in favour of sustainable development.

Distribution and Spatial Strategy

3.13 The draft Local Plan states *"the proposed option focuses on supporting regeneration of Andover and Romsey town centres, supporting growth at our key employment areas along with supporting growth at our larger urban and rural communities throughout the Borough. Overall, this supports focus at our two market towns with a wider distribution of development*



to a larger number of settlements”¹³. Whilst we agree that Andover and Romsey rightly take most of the development as the main settlements, the rural areas of the borough clearly need development to ensure the towns and villages have a future economic life with new housing to bring in new families to support schools, shops and facilities, as well as housing people can downsize to.

- 3.14 The draft Local Plan’s ‘sustainable spatial strategy’ includes: *“Sustaining vibrant and healthy rural communities through: Maintaining the roles of our rural settlements through accommodating development that meets the needs of local communities and supports existing accessible facilities...”*¹⁴.
- 3.15 Furthermore, the Spatial Strategy Topic paper states *“in addition to focussing growth in the larger settlements in Test Valley, the need to support growth in the rural area is also a key issue. The housing requirement can be delivered in the larger sustainable main settlements in the Borough which are well connected to community facilities, infrastructure, employment and public transport. However smaller scale growth is appropriate in the rural area of an appropriate scale to support the sustainability of rural villages and local facilities”*¹⁵.
- 3.16 We support these strategies, however it is disappointing to see that the draft Local Plan in its current form is not allowing this to come forwards effectively.
- 3.17 Spatial Strategy Policy 4 sets out the rural housing requirement, which is just 5% of the Borough-wide requirement and should be increased to make a meaningful contribution towards these strategies. In addition, it is not clear if any of the 542 homes identified for the rural areas would be coming forwards in Houghton (or Stockbridge), which are in close proximity to each other, and with Stockbridge being a key settlement serving the wider rural area. Hence this would be a logical location for some of the identified rural housing requirement and the draft Local Plan should be more specific in this regard.
- 3.18 Test Valley is unique in that a large proportion of land is rural compared to other authorities and many villages are likely to offer a lower number of services and facilities by default. Therefore, it should be accepted that for an appropriate distribution of housing to take place in a Borough which is predominantly rural, some people may need to be more reliant on the private vehicle and TVBC should recognise that the only way to make rural public transport more viable is through more people increasing the demand.
- 3.19 In addition, rural settlements which are close to other larger settlements should be looked upon favourably for the allocation of additional housing and it is important to encourage development in these locations to support local facilities and services so they remain viable. This in turn would create a better dispersal of housing and enable rural villages and settlements to not rely so heavily on Romsey and Andover which are further away.
- 3.20 The draft Local Plan in its current form is suppressing rural communities, not allowing them to grow and thrive and will offer such rural villages Houghton little opportunity for the future generation if the draft Local Plan is not amended accordingly.

¹³ Paragraph 3.11

¹⁴ Page 32

¹⁵ Paragraph 6.10



4.0 Development in Houghton

4.1 D. R. Busk controls various land parcels in Houghton, with three of particular relevance to this representation and the Local Plan Consultation, which are:

1. Land West of Rose Cottage
2. Houghton Allotments
3. Land Rear of Stevens Drove

4.2 The site location plan for each of the sites are in appendix A.

Land West of Rose Cottage

4.3 Land West of Rose Cottage lies at the northern end of Houghton and is surrounded by existing residential development.

4.4 The site has been promoted through TVBC's Call for Sites and is in the Strategic Housing and Economic Land Availability Assessment (SHELAA) (January 2024) known as reference 239, with an approximate capacity of 12 units.

4.5 The site is now being put forward with an amended, reduced boundary and a suggested capacity of approximately 4 dwellings, as shown at appendix A. A new vehicular access is proposed from the main road to serve the site.

Houghton Allotments

4.6 Houghton Allotments lies in the northern half of Houghton but almost in the centre of the village and is surrounded by existing residential development and an access track on the northern boundary, providing access to further residential development to the rear.

4.7 The site is currently included in the settlement boundary in the adopted Local Plan, but is now being proposed for removal, which we strongly disagreed with, as discussed in section 3. The Settlement Boundary Review states the reason for removal is due to the allotments comprising *"open land free from urban influences which is appropriate to remove from the settlement boundary"*. The site is clearly surrounded by existing development and is not open land. Also, it is noted that a criterion for exclusion in the Settlement Boundary Review is 'public open space including allotments', however, as previously emphasised to TVBC, this site is privately owned land and is not a public allotment, therefore does not fall into this category. The landowner currently allows the land to be used by local residents as allotments, but this is a benefit to the public and not a right. The allotments are not subject to any formal designation and could be closed at any time should the owner wish to do so. The site is privately owned and is in full control of the landowner, it is not owned by the Council or Parish and does not form a statutory site under the Allotments Act 1925, hence does not benefit from special protection.

4.8 The site is being put forward for development, with an approximate capacity of 4 units, as shown at appendix A. It is proposed to use the existing access that currently serves the



allotment. The landowner would also be open to discussions regarding relocation of the allotment.

Land Rear of Stevens Drove

- 4.9 Land Rear of Steven Drove lies adjacent and to the south-west of Houghton Allotments. To the north, south and east is existing residential development and to the west is open fields.
- 4.10 The site has been promoted through TVBC's Call for Sites and is in the SHELAA, known as reference 238, with an approximate capacity of 45 units. The site is now being put forward for approximately 20 units. The site is wholly in our client's ownership and there are 3 potential access points into the site, as shown at appendix A.
- 4.11 As part of the proposal, there is also potential for an upgraded community sewage system for the existing residents of Stevens Drove, who currently experience issues with the existing system.
- 4.12 In addition, the development would be able to deliver affordable housing, which would be a valuable contribution to the Borough and help address the significant waiting list and timescales for affordable housing in Houghton. The landowner is also open to the opportunity to bring forwards self-build development on all three sites.
- 4.13 All three sites represent logical locations for sustainable, modest growth of Houghton and are well related to the existing surrounding development and built form of Houghton. There are no overriding constraints preventing their development and such development would align with the Local Plan's visions and objectives to distribute development throughout the Borough, particularly within rural areas to enable to grow and thrive and not get left behind through accommodating development to sustain vibrant and healthy rural communities.

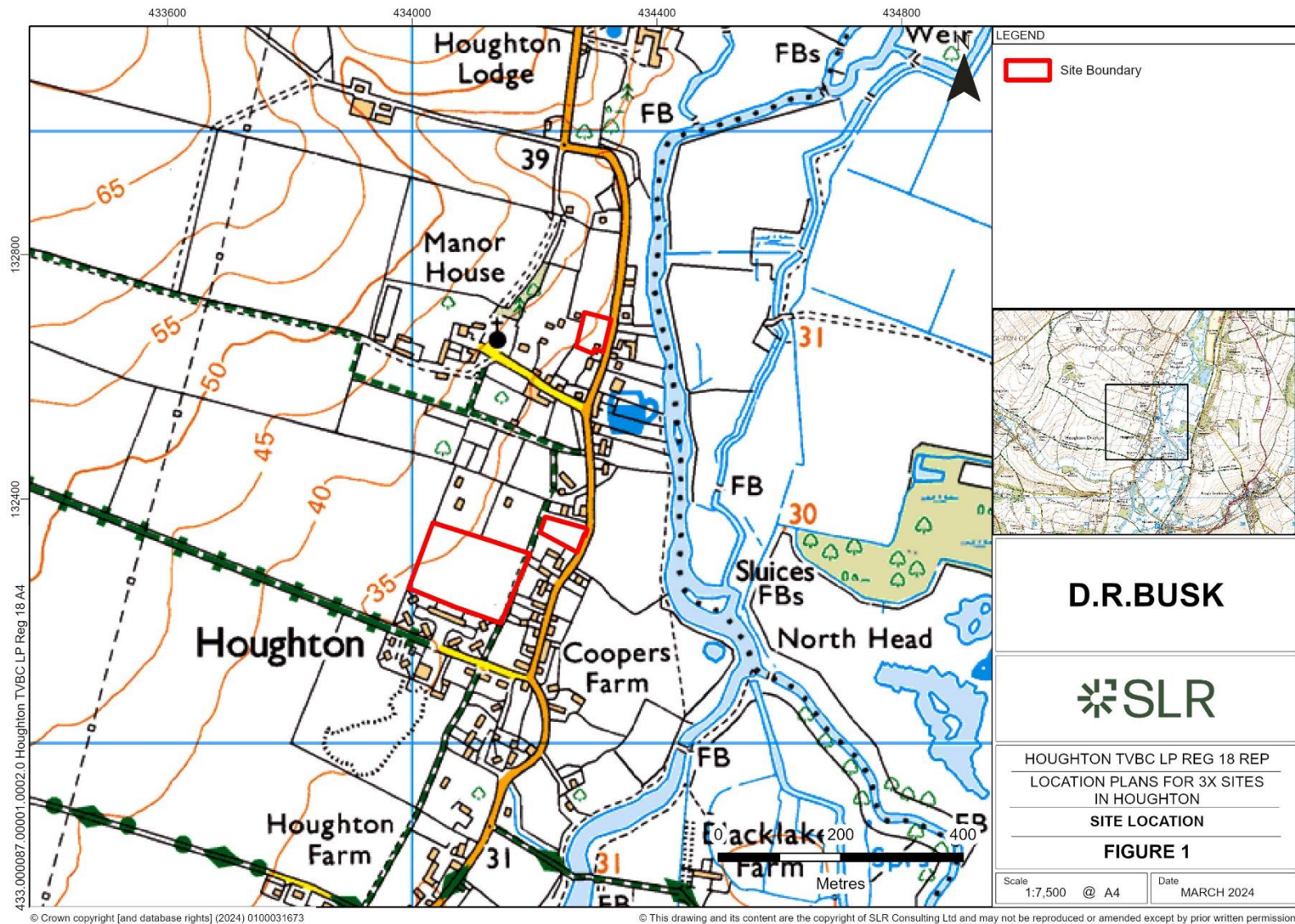


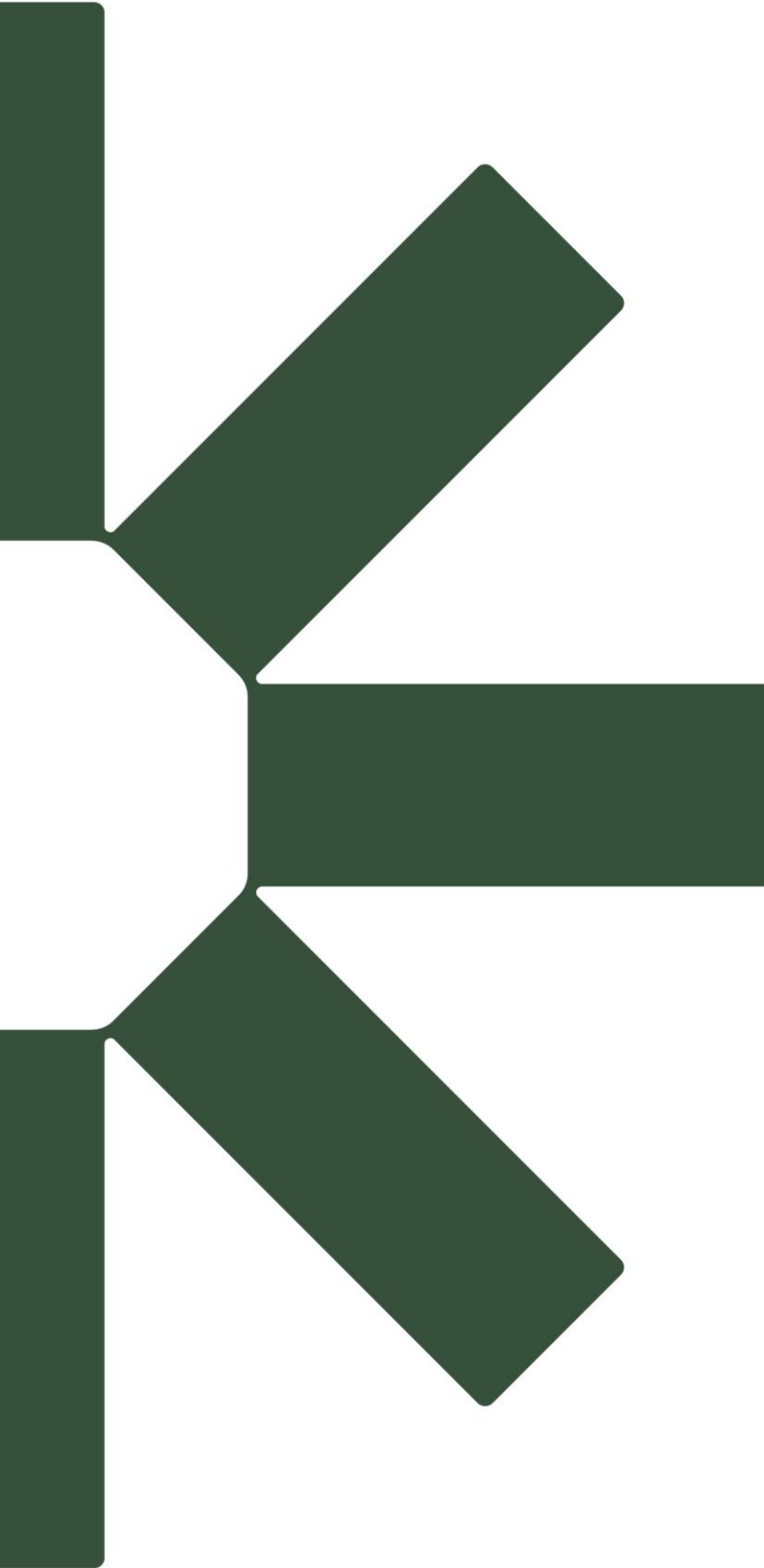
5.0 Conclusion

- 5.1 We support the draft Local Plan's objectives to better distribute development throughout the Borough, particularly within rural areas which face significant socio-economic issues in relation to affordability and sustainability. However, the draft Local Plan is not allowing this to materialise through its policies. Whilst we agree that Andover and Romsey rightly take most of the development as the main settlements, the draft Local Plan should be doing more to facilitate housing and affordable housing delivery, especially the rural areas in the heart of the Borough such as Houghton, to meet local need and to enable such areas to grow and thrive.
- 5.2 Affordable housing in TVBC is an increasingly significant and worsening issue which must be addressed. The draft Local Plan appears to simply acknowledge the affordable housing supply issue but has not gone far enough to address it. It should be increasing the overall housing requirement, particularly in the rural areas, which will allow additional affordable housing to come forwards.
- 5.3 The draft Local Plan does not sufficiently demonstrate TVBC have undertaken their duty to cooperate with neighbouring authorities or thoroughly reviewed whether they can assist with the unmet housing need in the area. The draft Local Plan is therefore not positively prepared.
- 5.4 We strongly object to the proposed removal of the settlement boundary of Houghton, which should not only remain, but be extended, as should its position in tier 3 of the settlement hierarchy.
- 5.5 Overall, the draft Local Plan in its current form is not allowing its visions and objectives to come forwards effectively and requires amendments to ensure the draft Local Plan is sound.
- 5.6 D. R. Busk would welcome discussions with TVBC regarding the development opportunities in Houghton to assist in achieving the draft Local Plan's strategy of growth in rural areas to support the sustainability of rural villages and local facilities.



Appendix A Site Locations Plan





Making Sustainability Happen