



Test Valley Borough Council Draft Local Plan 2040

Regulation 18 (Stage 2) Consultation March 2024

Highwood Group

Prepared by:

SLR Consulting Limited

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Appendix A Response to Stage 1 Regulation 18 TVBC Local Plan Consultation

Appendix B Letter from HiSP Multi Academy Trust to TVBC Stage 2 Regulation 18 Consultation

Appendix C Concept Masterplan and Location Plan



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1.0 Introduction

- 1.1 This representation is prepared by SLR Consulting on behalf of Highwood Group (hereafter 'Highwood') in response to the Test Valley Borough Council (TVBC) Draft Local Plan 2040 Regulation 18 Stage 2 consultation.
- 1.2 Highwood have a continued interest in land adjacent to Test Valley School (hereafter 'the site') in the settlement of Stockbridge. The latest Concept Plan is included at Appendix C which includes land east of Test Valley School.
- 1.3 This representation follows previous representations made on Highwood's behalf in relation to the site, namely the Issues and Options and Refined Issues and Options consultations held in 2018 and 2020, and most recently the 2022 representations to the Regulation 18 Stage 1 Consultation (hereafter 'the Stage 1 response'). The Stage 1 response is appended at Appendix A. Many of the points made in the earlier Regulation 18 Stage 1 consultation remain relevant and unaddressed in this latest stage of the plan.
- 1.4 The area has also been promoted through TVBC's Call for Sites exercise. The site has two references in the latest Strategic Housing and Economic Land Availability Assessment (SHELAA) - 236 and 237.
- 1.5 Highwood have also been working with the senior leadership team of Test Valley School. The letter appended at Appendix B written by the interim CEO of the HiSP Academy Trust, which recently took on the running of the school, highlights the acute issues the school are currently facing. Key issues includes:
 - A finding from Ofsted in their most recent inspection that the school is 'inadequate' across all categories,
 - a significant under provision of pupils at the school such that it is only just over 50% capacity, risking the school's ongoing viability.
 - Sub-standard access arrangements to the school, particularly for school busses, resulting in lengthy waits for pupils leaving school and safety issues
 - Significant under-provision of school playing fields against DoE Bulletin 103 guidelines for mainstream schools.
 - Need for investment in the school buildings
 - Difficulty recruiting teachers locally due to the highest average house prices in the county.
- 1.6 The position of the Trust as detailed in their letter constitutes a material change in circumstances for any planning assessment for Stockbridge and this site.
- 1.7 Working with the school, Highwood have developed the concept plan at Appendix C which provides opportunities to help address all of the school's identified issues whilst providing circa 150 new homes to help Stockbridge grow sustainably. The Concept plan encompasses site 237, part of site 236 and land not previously submitted to the call for sites to the east of the school. The land encompassed by the concept plan is now the principal area promoted for development and a separate submission to the current call for sites is being made to formally submit the site.



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- 1.8 The southern part of site 236 is no longer promoted for residential development at this time. The remainder of the southern part of the land forming 236 also provides continued opportunity for green and blue infrastructure to possibly serve the site and wider district, including potential BNG and Nutrient credits.
- 1.9 It is also important to recognise that whilst the site is outside of the *parish* of Stockbridge, being within neighbouring Longstock and Houghton Parishes, but it is demonstrably an extension to the *settlement* of Stockbridge and hence it is important it is considered as such.
- 1.10 We are pleased to see TVBC making progress with a new plan and welcome the opportunity to comment on this latest version. This representation begins by commenting on the Plan's approach to housing need, both at a Borough level and specifically within the rural areas, and in particular around Stockbridge. The representation will then go onto consider the spatial strategy, focusing on how TVBC are proposing to meet their housing needs.
- 1.11 Overall, it will conclude that whilst there are some positive elements to the emerging plan, including recognition that the rural areas require some housing, the plan does not go far enough either in its aspirations for housing delivery and in particular planning for acutely needed new housing to support the district's central rural areas, which can be best delivered through new housing allocations at Stockbridge. Specifically, development of land around Test Valley School provides important opportunities to not only provide wider benefits to Stockbridge through sustainable growth, but specifically address the increasing challenges faced by Test Valley School.



2.0 Meeting Test Valley's Housing Needs

- 2.1 Firstly, we are pleased that TVBC have maintained their commitment to meeting as a minimum the Standard Method derived housing need, equating to (based on the latest calculation) 11,000 homes for the plan period to 2040, or 550 homes per annum for the same period. This should be continually re-calculated to equate for any updated figures that may arise ahead of the plan's adoption.
- 2.2 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, including within Stockbridge which is suffering from a lack of growth and acute housing affordability challenges.
- 2.3 The below should therefore be added to the commentary made on the stage 1 consultation on behalf of Highwood and follows the same structure; looking first at the exceptional unmet housing needs, then the acute district wide affordable housing need and then at Stockbridge in particular.

The Plan Period

- 2.4 The local plan (and associated updated LDS, Nov 2023) has an optimistic projected adoption date of Q2 2026 following submission for examination in Q3 2025 (as also stated in Fig.19 on page 9 of the Plan), with a proposed end date for the plan period of 2040.
- 2.5 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.
- 2.6 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), and the optimistic date of adoption so soon after examination, 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.
- 2.7 Our suggestion is that the plan's timescale be extended by at least an additional two years, concluding in 2042.
- 2.8 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 two-year period.
- 2.9 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.



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Unmet Housing Need

- 2.10 Highwood maintain that TVBC should be meeting some of the significant unmet housing needs arising from their neighbouring authorities.
- 2.11 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 <u>is informed by agreements with other authorities</u>, <u>so that unmet need from neighbouring areas is accommodated</u> where it is practical to do so and is consistent with achieving sustainable development [my <u>emphasis</u>];
- 2.12 The 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.'

- 2.13 The Council does discuss the unmet needs, particularly of that arising from the PfSH area of which Test Valley is a part. However, it claims there is 'no clear evidence' of the level of unmet housing need in neighbouring authorities. The plan goes onto state the reason for this is the various stages at which others local plans are at make establishing a level of unmet for each authority unrealistic, albeit it does, rightly, confirm this may change before the local plan is adopted.
- 2.14 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's latest Position Statement¹, still reports a shortfall in housing of nearing 12,000 units.
- 2.15 The biggest deficit arises from New Forest 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.
- 2.16 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.
- 2.17 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 and there is at this time insufficient evidence that

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¹ PfSH Spatial Position Statement (6th December 2023)

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TVBC have seriously engaged and collaborated with its neighbours on how to address the pressing cross-boundary strategic matter of housing need.

- 2.18 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 Ground² 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.
- 2.19 This alone represents a clear reason to seriously consider increasing the housing requirement for the plan period to assist in meeting this need.

Affordable Housing Need across the District

- 2.20 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.
- 2.21 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.
- 2.22 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.'
- 2.23 Viable market led developments are the surest way of maximising affordable housing delivery. Market led sites in a wider range of locations, particularly in the rural areas as will be demonstrated below, would help better address the acute affordable housing need in a sustainable way.

Affordable Housing Need in Stockbridge and the Rural Areas

2.24 It is firstly important to note that whilst technically the site's being promoted are outside of the administrative parish boundary of Stockbridge, the sites 236 and 237 both directly adjoin the Stockbridge settlement boundary, and the land east of Test Valley School is entirely within the Stockbridge settlement boundary. It is therefore important, in considering the sites and wider need to recognise that development of the sites would be meeting the direct needs of Stockbridge as well as the wider rural early.

² PfSH Statement of Common Ground – Broad Areas of Search for Growth Assessments (6th December 2023)

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- 2.25 The stage 1 representation on behalf of Highwood has already set out the particular affordability issues within the rural areas and at Stockbridge. The indications are that this situation is worsening, which puts at significant risk the sustainability and vitality of the Borough's rural settlements, including Stockbridge and its catchment.
- 2.26 Census data for 2021 indicates that at that time 43% of residents of Stockbridge were 65 and over, compared to 21% in the Borough as a whole. This follows a long-standing trend that indicates an ageing population within the town. This leads to reducing levels of economic activity, as demonstrated by the over half of over 16-year-old residents been classified as 'economically inactive' in the 2021 Census.³ This compares to 36.1% economically inactive residents in Test Valley Borough as a whole.
- 2.27 The latest census data also indicates significant over-occupancy of housing within Stockbridge, with 79% of households within Stockbridge Parish being classified as under occupied.⁴ This results in issues for families wishing to move to the area and options for families to downsize to more suitable accommodation, leading to increasing issues with affordability.
- 2.28 The local affordability issues are highlighted by house price data for the area which indicate yet further average house price increases since the representation made in April 2022. Data from the Zoopla 'Zed Index' for the S020 postcode zone, which incorporates Stockbridge, indicates average house prices within S020 of £832,157. This represents a circa £50,000 increase since April 2022, further putting housing out of reach of those looking to move to Stockbridge. Using the latest Median Earnings for the District of £35,058, this would mean the SO20 average house price to median Borough earnings ratio would be 23.7. This demonstrates that the very vast majority of residents in the Borough (and more widely) would not be able to afford a house in Stockbridge and its hinterland.
- 2.29 Comparing the average house price to that of the Borough wide house price ratio of 10.11 indicates that Stockbridge has an exceptionally dire affordability issue. By way of comparison, all but one of the London Borough's have a lower house price to earnings ratio.
- 2.30 Previous representations on behalf of Highwood have shown that it is likely those that work in Stockbridge (excluding those that principally can work from home) cannot afford to live in the town. The latest 2021 census data helps demonstrate this with only 25 of 239 working residents of Stockbridge Parish being employed in 'sales and customer service' and 'Caring, leisure and other service' occupations. Given the number of retail and leisure related businesses in the town, it is therefore highly likely that employees of these businesses travel into the town, being unable to afford a home locally.
- 2.31 Waiting times for affordable housing in the local area also remain exceptionally high. Data from Hampshire Homes Choice website indicates a 76-week average wait for a property in Stockbridge, with only 20 properties being available, 17 of which are 1 bed flats. The

³ https://www.censusdata.uk/e04004639-stockbridge/ts066-economic-activity-status [accessed 15/03/2024]

⁴ https://www.censusdata.uk/e04004639-stockbridge/ts052-occupancy-rating-for-bedrooms [accessed

^{15/03/2024] –} Under occupation is calculated by comparing the number of bedrooms the household requires to the number of available bedrooms.

⁵ https://www.primelocation.com/heatmaps/ [accessed 21-03-2024]

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neighbouring parish of Houghton indicates an average wait of 193 weeks for 10 properties within the parish.⁶

- 2.32 There is therefore a compelling case, on affordability grounds alone, to look to increase the housing delivered within the rural areas to assist in meeting the dire need for housing overall.
- 2.33 The recognition of a need to allocate some housing to the rural areas through policy SS4 is supported in principle but the quantum and approach to the rural housing requirement is currently ineffective. The quantum should be reviewed and revised upwards and, just as importantly, the plan should look to allocate sites within relatively sustainable locations in the rural areas, most especially Stockbridge, the only Tier 2 settlement in the rural area which supports the wider district.

Contingency

2.34 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 are inevitably more complex and take longer to commence. 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.

⁶https://www.hampshirehomechoice.org.uk/AverageWaitingTime/Results?AverageWaitingTimePeriods=1825&AverageWaitingTimeLocation=2&Sender=NavigationBarPanel&#map-link-41 [accessed 15-03-2024]

⁷ Based on total supply from new Housing Allocations of 5434.

Spatial Strategy

3.0

3.1 This section provides comments on the proposed Spatial Strategy, with particular focus on the approach to distributing the acutely needed housing across the Borough. It will consider the relevant Spatial Strategy policies and associated supporting evidence.

Spatial Strategy Policy 1 - Settlement Hierarchy

- 3.2 Highwood Homes support the inclusion of a settlement hierarchy policy. Furthermore, they support Stockbridge's inclusion as a Tier 2 settlement. The settlement Hierarchy Assessment paper shows that of all the Tier 2 settlement's Stockbridge is the most sustainable, with all key facilities and the most secondary facilities of the settlements in the same tier.
- 3.3 It is also pleasing to see within the assessment paper that some recognition is given to its important role servicing the more rural settlements of the Borough. However, this recognition Highwood contend should be given more prominence in the plan and elevate Stockbridge's position and importance beyond the other Tier 2 settlements.
- 3.4 Figure 3.1 of the draft Local Plan plainly illustrates Stockbridge's unique position serving the whole central area every other Tier 2 settlement (including Ludgershall in Wiltshire County) is essentially a satellite to either Andover or Romsey and Southampton. Whilst supporting its Tier 2 status, Stockbridge is plainly of greater importance to the wider sustainability of the overall borough, and particularly the rural areas, than the other Tier 2 settlements which are essentially served by other settlements.
- 3.5 As was set out in the response to the Stage 1 consultation at paragraphs 3.3 to 3.16, Stockbridge is demonstrably a highly sustainable settlement that, in its own right, performs better in sustainability terms than other Tier 2 settlements and has better accessibility, including to Winchester train station, a circa 20-minute drive or bus journey (via the 61 bus). By comparison journeys by bus from the outskirts of Andover to Andover Train station take roughly the same or longer length of time
- 3.6 This is also illustrated by the review of site accessibility within the Preliminary Transport Assessment (PTA) undertaken to support the proposed allocations. The Appendix B Site Assessment Plots within the PTA for the strategic sites reviewed near Ludgershall and Andover illustrate that the sites assessed often do not have the same levels of accessibility as Stockbridge.

Distribution of Development

- 3.7 The Spatial Strategy Topic paper confirms at 5.13 that alongside continued growth at the Tier 1 towns of Andover and Romsey, the spatial strategy will provide '...a wider distribution of growth to a larger number of settlements in accordance with the settlement hierarchy.'
- 3.8 Policy SS2 then positively confirms that Tier 2 settlements will be suitable for 'Strategic Allocations'.



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- 3.9 The plan aims to meet the majority of its housing requirement via new strategic scale allocations in and around Andover, Romsey, Valley Park and Ludgershall, equating to 5,434 houses. No allocations are identified at Stockbridge.
- 3.10 The draft plan also allocates, albeit a very small, proportion of its housing requirement to the rural areas equating to 542 homes overall split between the north and south of the borough. Policy SS5 then distributes a further 110 houses to a number of the rural settlements to be allocated in Neighbourhood Plans, all of which are Tier 3 or lower. Neither approach identifies housing at Stockbridge specifically.
- 3.11 Conspicuous by its absence is any identified housing allocation or even provision at Stockbridge, a recognised Tier 2 settlement of high sustainability at the centre of the Borough and which serves a critical function in maintaining the Borough's rural hinterlands.
- 3.12 The plan or supporting evidence base give no rational, compelling or reasoned argument, as to why, even in principle, no growth is proposed at Stockbridge, arguably the 3rd most important and sustainable settlement in the Borough.
- 3.13 It is also worth highlighting that no plan in recent years has proposed any significant growth within Stockbridge, which is recognised by the Sustainability Appraisal (SA) at 5.114. The impacts of this sustained failure to allow growth in Stockbridge are being felt by ever more unaffordable housing prices (as set out above) and increasing risks to the sustainability of the settlement.
- 3.14 The contention at 5.114 of the SA that there are no significant issues in relation to Stockbridge is strongly refuted and not backed up by evidence.
- 3.15 There are significant risks, most immediate of which is the threat, as highlighted previously, to the ongoing viability of Test Valley School, the most recent data for which indicates it is only operating at just over half of its capacity. The SA site analysis identifies that several of the strategic allocations would require new school provision due to local capacity issues; whilst Test Valley School is underutilised.
- 3.16 The letter submitted alongside this representation from the Senior Leadership of the school affirms in clear terms the very real risks to the school, a critical asset to Stockbridge and the wider rural area, the loss of which would have serious negative consequences to the overall sustainability of not just Stockbridge but the wider district.
- 3.17 As alluded to by the SA and set out in the previous representation at Stage 1, Stockbridge is also heavily reliant on the visitor economy to sustain its shops and facilities, which is a less sustainable way of maintaining vital services and facilities that serve the wider rural catchment of the Borough.
- 3.18 As set out above, there are also significant affordability issues within the area, not just within Stockbridge but also the wider rural area. As highlighted, there are significant waits for affordable housing in Stockbridge and Houghton and house prices mean market housing is generally out of reach to all but the highest earning households. At best this contributes to

⁸ Current number of pupils is 400 compared to a capacity of 780 pupils. Information from https://www.get-information-schools.service.gov.uk/Establishments/Establishment/Details/116426#school-dashboard

unsustainable travel patterns as people commute into Stockbridge from lower cost areas and at worst it will put at the risk viability of business being able to attract the labour they need. This is illustrated by the letter from Test Valley School at Appendix B which highlights the significant challenge the school has in attracting the teachers they need.

- 3.19 The importance of new growth at Stockbridge is clearly set out at paragraphs 3.17 to 3.23 of the Stage 1 draft consultation. These points remain highly relevant and continue to show why growth at Stockbridge is essential to maintain its role and function.
- 3.20 As will be discussed in more detail in the following section, whilst there are constraints towards the centre of Stockbridge, such as flooding and heritage considerations, there are deliverable and available sites, such as that at Test Valley School, that do not suffer from any overriding constraints. The fact sites may not be in the Parish of Stockbridge is not a legitimate reason to exclude sites that otherwise perform exceptionally well.
- 3.21 It is not clear if any of the 542 homes identified for the rural areas would be expected to come forward at Stockbridge as a key settlement serving the rural area, this would be the most logical location for a large proportion of the identified rural housing. However, the provision should be plan led through a specific allocation of housing rather than in an ad-hoc manner dependent on local communities deciding to take housing, which in our experience is not a reliable way for housing to come forward.
- 3.22 It is also illogical that smaller settlements, with limited facilities and services, but which happen to be progressing a Neighbourhood Plan, have been given a housing requirement (albeit a small one) but no such requirement is provided to the most sustainable, Tier 2, settlement at the centre of the Borough Stockbridge.
- 3.23 The revision to the HMA boundaries, also highlights the critical role Stockbridge plays. The Stage 1 representation already set out that Stockbridge village essentially sits within the transition zone between HMA boundaries. It can therefore help meet the housing needs of both HMAs as well as some of the unmet needs of the South.
- 3.24 The SA and other evidence documents provide no other clear evidence or rationale that explains why no housing is identified at Stockbridge despite evidence that sites are suitable and available. The failure to identify specifically any development at Stockbridge is plainly irrational given the tacit acceptance that growth in the rural areas is needed and the identification of Stockbridge as a Tier 2 settlement which are identified as being suitable for new allocations.
- 3.25 Stockbridge is <u>very</u> overdue new growth to support its critical role and function. As highlighted in paragraphs 3.17 to 3.23 of the stage 1 representation, which indicates growth in Stockbridge Parish has essentially halved since the 1800s, whereas similar sizes settlements have been allowed to grow to meet their needs. New housing development at Stockbridge would align with the identified preferred spatial strategy to direct development to the higher tier settlements and sustaining vibrant and healthy rural communities.



4.0 Development at Test Valley School

- 4.1 The land adjacent Test Valley School (sites 236 and 237 in the TVBC SHELAA) has been promoted over a number of years.
- 4.2 Highwood have also been working closely with Test Valley School to develop their proposals, so they not only deliver much needed new homes in Stockbridge, but also provide enhancements to the school.
- 4.3 Discussions with the school's senior leadership team, now part of the HISP Multi Academy Trust, have led to a vision for development of their existing playing fields whilst providing new playing fields to the immediate south of the school. The new provision would represent a significant net qualitative and quantitative improvement to the playing fields available to the school, overcoming a significant deficit in land based on current Department for Education (DfE) guidance. The below table indicates the existing school provision set against the DFE requirements and that proposed:

Zone Guidelines for mainstream schools – Bulletin 103	DfE Requirement (m2)	Existing (m2)	Proposal (m2)
Soft outdoor PE	33,000-36,360	20,690 (deficit of over 12,000msq)	36,359

4.4 An extract of the draft proposals are included below with the full concept masterplan provided at Appendix C.



Figure 1 - Extract of Concept Masterplan showing new homes east and west of Test Valley School and new, modern, sports facilities to the south of Test Valley School.



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- 4.5 The new, full sized running track designed to Sports England standards and a youth football pitch, would be provided alongside improvements to the school access through the provision of a new dedicated bus turning area and additional parking to help alleviate the existing issues with school drop off and pick up known to occur at the school.
- 4.6 The proposals will also deliver circa 150 new homes to help Stockbridge grow and remain a sustainable place. The proposals for the new homes would include new play provision to support the new homes. Highwood are also exploring with the school whether the new playing fields could be made open to the public outside of school hours which would represent a major asset for the community.
- 4.7 The land encompassed by the concept plan is now the principal area promoted for development and a separate submission to the current call for sites is being made to formally submit the revised site. The land east of Test Valley School, currently used as their playing fields, is already within the settlement boundary of Stockbridge. The other areas promoted for built development as shown on the concept plan all directly adjoin the Stockbridge settlement boundary. The site, whilst technically outside of the parish boundary of Stockbridge, would demonstrably be a extension of the settlement of Stockbridge.
- 4.8 The remainder of the southern part of the land forming 236 also provides continued opportunity for green and blue infrastructure to possibly serve the site and wider district, including potential BNG and Nutrient credits, whilst preventing any coalescence with Houghton. The southern part of site 236 is no longer promoted for residential development at this time.
- 4.9 There are also opportunities to provide 'park and stride' type facilities on land to the north of Test Valley School in the same control as the sites, which could be used by staff working in Stockbridge to free up parking for customers in the centre of the settlement.

Local Plan Site Sustainability Appraisal

- 4.10 The SA appendix 4 includes a Housing Site Appraisal which assesses sites 236 and 237 (but not the current proposals). The sites generally perform well and of similar or comparable performance to the allocated sites, and yet they have not been considered for allocation. Below we set out a brief commentary on each of the 12 objectives, including responding to the comments in the SA assessment, which show that the site performs well, is sustainable and should be allocated.
- 4.11 We disagree with a number of the conclusions reached on the site against several objectives.
- 4.12 In regards **Objective 1: Housing**, the site should score strongly positive. There is an acute need for housing in the borough and specifically within the rural areas and as set out elsewhere, there are considerable risks to Stockbridge if the settlement is not allowed to grow. The proposals will also deliver policy compliment levels of affordable housing. Consequently, delivery of this site for housing performs **strongly positive** against Objective 1.
- 4.13 In regards **Objective 2: Economy**, the site is assessed against its accessibility to jobs in Andover. However, this ignores the particular role Stockbridge has in serving the rural areas,



as well as the many jobs available within the town which currently result in the need for substantial levels of in-commuting (as demonstrated above). The town also provides good access to jobs in the rural area within agriculture and related industries. New homes would also provide a more sustainable customer base for local facilities and services which are critical to the success of the borough.

- 4.14 Based on information from Stockbridge Business Association (SBA), there are over 20 different shops and nearly ten pubs and restaurant within the village. It is known there are further business, facilities and shops available not listed on the SBA website, such as the two Co-Op stores. Taking a conservative estimate, there is likely to be well over 250 jobs within the village, plus important employers such as Test Valley School, which employs 59 salaried staff (not including contractors), and Stockbridge Primary School. As already discussed, the majority of employees of these businesses are unlikely to be able to afford a home within Stockbridge. New development would increase sustainable travel patterns to local jobs and improve the pool of labour, improving the economic sustainability of the town.
- 4.15 The site also has good access to the pool of jobs and facilities in Winchester. As a minimum the site is therefore considered to perform **positively** against Objective 2
- 4.16 The assessment on **Objective 3: Access and Transport** makes some inaccurate assumptions regarding accessibility. For example, it only references infrequent services to Romsey. However, there are also services to Winchester and Salisbury which operate regularly and provide sustainable access to these larger settlements. As already shown, the site is highly accessible and has excellent level of facility and service provision relative to its size.
- 4.17 The site also performs well against **Objective 8: Landscape.** The development will inevitably result in the loss of a green field, causing a level of harm like any greenfield development (as would be the case with the other greenfield sites proposed for allocation). However, this harm can be mitigated by successful strategic planting and sensitive, landscape led design. Furthermore, the land towards the south of site 236 is no longer promoted for built development meaning there will be no harmful coalescence with Houghton settlement. To the contrary, the proposals provide an opportunity to protect the land from built development into perpetuity through its possible use for BNG and/or nutrient credits. The site is also well related to the existing built-up area, with built development proposed to sit adjacent to existing built form. Further landscape appraisal work will further refine the proposed landscaping.
- 4.18 Highwood disagree with the substantial negative conclusion reached against **Objective 9**: **Heritage**. Whilst there are heritage assets in the area, which will be assessed and inform any site design, there is no evidence presented by the Council that development of the site would result in 'substantial' harm to a heritage asset at the upper end of the spectrum and it is not clear how this conclusion has been reached. This is particularly so given the supporting text to the SA assessment of site 237 confirms that some development in principle of site 237 may be acceptable and given it acknowledges for both sites that views towards the listed Marsh Court and associated assets '...should not be adversely affected.' Which overcomes Reason for Refusal 3 on application 13/02790/FULLN. Any such heritage assessment should be undertaken by a heritage professional and clearly evidenced. Locating the sports provision on the outer edge of the development, alongside new sensitive landscape planting will further assist in overcoming the heritage reasons for refusal



associated with 13/02790/FULLN. Highwood are committed to designing the site to avoid harm and will be undertaking a heritage assessment to inform their approach to the final site layout.

- 4.19 It is noteworthy that other sites that have been assessed, including sites proposed for allocation, with heritage assets in similar proximity to the site have been assessed as having a 'Neutral' Performance indicating an inconsistent approach the assessment of sites against the heritage objective.
- 4.20 The site provides substantial areas for new local green infrastructure and the opportunities for enhancement were clearly set out in previous representation meaning the site should perform positively against **Objective 10: Biodiversity and Habitat Connectivity**. The latest proposals include a buffer of substantial tree and habitat planting providing additional linkages around the site.
- 4.21 The assessment mentions ancient woodland near the site. However, using DEFRA's 'Magic Maps' facility, this does not identify any Ancient Woodland within close proximity of the site. All the same, no trees will be lost from within the housing parcels, with any losses required to achieve access made up by new planting. Land also in Highwoods control also provides opportunities for further enhancement both in terms of BNG and providing required mitigation for nutrient offsetting arising from the development. The site therefore should perform positively against Objective 10
- 4.22 The proposals also perform positively against **Objective 11: Climate Change Mitigation**, in that Highwood are committed to delivering zero carbon standard housing. The site is also sustainably located with good access to facilities and services helping prevent the need to travel by car.
- 4.23 In relation to **Objective 12: Health and Wellbeing** the site provides opportunities to substantially improve the health and wellbeing of existing and future residents of the borough. Firstly, access to a safe, high-quality home is a substantial determinant of peoples' quality of life. Delivery of housing in an area with acute affordability issues itself is a significant positive against this policy.
- 4.24 The proposals also could enable significant improvements to recreational provision for Test Valley School, which could potentially be open to the public, offering a significant positive against objective 12. The role new housing would have in improving the viability of local services and facilities, and in particular the school, also represents a substantial positive for local health and wellbeing.
- 4.25 The assessment also fails to recognise the ability of the site to provide access to the countryside for residents, including to local PROW and to the national cycle network, specifically NCN 246, providing routes to Andover and Romsey.
- 4.26 The conclusion to the SA gives no overriding reasons why development of the site is not appropriate and the assessment contains many inaccuracies. The only substantial negative, relating to heritage, is considered to be considerably overstated and not consistent with the approach adopted to other sites where heritage assets are closer. Further heritage assessment work will be undertaken in due course to confirm that the development of the site will not result in substantial harm.



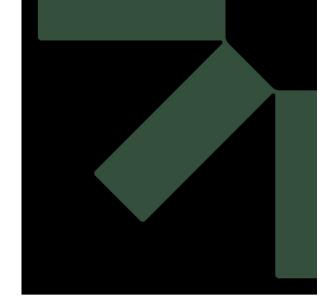
- 27 March 2024 SLR Project No.: 433.000076.00001
- 4.27 Overall, the proposals for development of the site represent an excellent opportunity, helping unlock a number of aspirations and protect Test Valley School from closure. This is explicitly recognised by the school in their representation to the plan, which is appended to this letter. Key benefits arising from the proposals include:
 - Delivery of a significant amount of affordable housing likely to be more than triple the
 affordable housing on offer in the settlement, which will include starter homes for young
 families to help address the dire need for affordable homes in the area, including for
 potential teachers at Test Valley School.
 - Support for local businesses and services from a pool of new local residents providing regular year-round custom, reversing the stagnant population growth in the settlement and increasing the population of younger people.
 - Support for local schools from young families moving to the area to improve the viability of local schools.
 - Potential to deliver improvements to the adjoining school, including new sports pitches to the latest Sports England and DfE Bulletin 103 standards, an athletics track and safer and more convenient school drop off and pick up zone.
 - Provision of improved and safer school pick up and drop off area for busses and parents, resolving congestion issues and improving the environment around the school
 - Increased investment in community infrastructure and Test Valley School arising from likely developer contributions as well as council tax receipts.
 - High quality design from a local SME that respects the heritage and landscape of the settlement.



5.0 Conclusion

- 5.1 Highwood welcome the opportunity to participate in the second stage of TVBC's regulation 18 consultation in relation to the Draft Local Plan 2040.
- 5.2 Highwood are pleased that TVBC are recognising that development needs to be distributed more evenly across the borough, including to the more rural areas and Tier 2 settlements like Stockbridge. However, the actual approach adopted to housing allocation does not match the strategy in that no allocations are identified at Stockbridge, a settlement rightly identified as having the potential for a new strategic allocation by policy SS1. This is a significant failure of the current plan.
- 5.3 As this and earlier representations have demonstrated, Stockbridge represents a settlement in dire need of growth to help support its future. There is an acute affordability crisis in the rural areas of the borough and a shrinking young population which represents a significant risk to the long-term viability of Stockbridge, and as a consequence, the wider hinterland it serves. This includes the risk of the Test Valley Secondary school closing given its currently very low student population.
- 5.4 The position of the HiSP Academy Trust, as detailed in their letter, constitutes a material change in circumstances for any planning assessment for Stockbridge and this site. The letter is clear that the proposals put forward by Highwood would help the school overcome many of the multiple challenges they are currently facing which, if unresolved, would have ramifications for the long-term sustainability of Stockbridge and the wider rural area.
- 5.5 TVBC also need to recognise the significant need for housing in the area and should seriously consider an uplift to their housing requirement to meet the combined challenges of unmet housing need and the affordable housing crisis. Failure to do these risks accelerating the housing crisis in the district.
- 5.6 Highwood would welcome opportunities to discuss the opportunities available from the site with TVBC and the local community.





Appendix A Response to Stage 1 Regulation 18 TVBC Local Plan Consultation





Test Valley Borough Council Draft Local Plan 2040

Regulation 18 (Stage 1) Consultation February 2022

Consultation Response

Land at Stockbridge School, Stockbridge

Prepared on behalf of Highwood

March 2022



Document control

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Appendices

Appendix 1 – Plan of services and facilities in Stockbridge

Appendix 2 – Buses from Stockbridge



1.0 INTRODUCTION

- 1.1 This representation is prepared by Tetra Tech Planning on behalf of Highwood Group (hereafter 'Highwood') in response to the Test Valley Borough Council (TVBC) Draft Local Plan 2040 Regulation 18 Stage 1 consultation.
- 1.2 This representation follows previous representations made as part of the Issues and Options and Refined Issues and Options consultation held in 2018 and 2020 respectively. The site at Test Valley School has previously been promoted through TVBC's Call for Sites and the sites have SHELAA references 236 and 237. Highwood now have an interest in the land at Test Valley School.
- 1.3 We thank TVBC for providing the opportunity to comment on this latest version of the plan. This representation begins by considering the needs of the Borough, focusing on Chapter 5 of the Consultation document, before commenting on the spatial strategy and how those needs could be sustainably met, with a focus on Chapters 3 and 4 of the consultation document.



2.0 MEETING TEST VALLEY'S HOUSING NEEDS

- 2.1 Firstly, the use of the Standard Method (as required by the NPPF) to calculate housing need and the commitment at paragraph 5.13 to meet the need derived from the Standard Method is supported. We also agree that the Standard Method calculation needs to be regularly reviewed based on the latest information (for example updated affordability data). However, it is disappointing that the Draft Plan goes onto claim there are no 'exceptional circumstances' to justify a higher housing requirement and hence no need to plan for a higher number of homes.
- 2.2 There are a number of compelling reasons why TVBC should be ambitious and plan for a higher number of homes.
- Our first contention is that the application of an 'exceptional circumstances' test to the decision not to seek a higher number of homes is misplaced, particularly in relation to unmet need of neighbouring authorities. The PPG is clear that the Standard Method 'provides a minimum starting point in determining the number of homes needed in an area [our emphasis]' which the draft plan recognises. 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 [our emphasis]'. As this section will show, there are compelling reasons why TVBC should be proactively and ambitiously planning for higher housing growth to help tackle the worsening issues of affordability, particularly in the rural areas, and help meet the established unmet need within the wider south Hampshire sub-region of which Test Valley is a part.

Unmet Needs

- 2.4 Firstly, it is contended that TVBC should be accommodating some of the unmet need of the wider sub region, particularly the South Hampshire region which has an established unmet need overall approaching 13,000 homes.¹ Furthermore, neighbouring Southampton City Council are predicted to have a shortfall of 7,345 homes against their forecast requirement (as set by the Standard Method). Test Valley, whilst being located only partly in the sub-region, still has an opportunity to help meet some of this need within their considerably less constrained boundaries, most appropriately within the STV HMA.
- 2.5 Councils have a Duty to Cooperate with each other on strategic issues, including housing issues, across administrative boundaries. It is not clear what discussions have to date taken place between TVBC and neighbouring authorities about meeting unmet need. The Strategic Housing Market

tetratecheurope.com

¹ PfSH Statement of Common Ground (SoCG) 2021 – Revision and Update (25/10/21). TVBC are a member of PfSH and a Signatory to the SoCG.



Assessment (SHMA) completed in January 2022 confirms at paragraph 3.18 that it gave no consideration to unmet need of neighbouring authorities despite the significant and acknowledged unmet need as described above.

- 2.6 Test Valley is considerably less constrained than its neighbouring authorities and contains a number of settlements as well as at Romsey across the STV HMA, including Stockbridge, which are highly sustainable and could help meet the unmet needs of Southampton and the wider South Hampshire Region.
- 2.7 TVBC has significant potential to contribute towards the supply necessary to overcome theas yet unmet needs within their boundaries. The NPPF is clear that local authorities should work with their neighbours to explore how unmet need can be met. It is clear that '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 (NPPF Para. 61).' There is no evidence that this proactive engagement has yet occurred to discuss how TVBC can help accommodate unmet need and it is concerning that such a reasonable alternative has not been explored as part of the SHMA, the Sustainability Appraisal (SA) or considered as an option within the Draft Plan. TVBC should not wait for a 'request' in this regard from other local authorities, given the level of unmet need in the area is already well understood and acknowledged by TVBC, but instead should be proactively planning to accommodate some, if not all, of the already identified shortfall. Failure to do this will undermine the soundness of the plan. Therefore, it is recommended that Test Valley proactively explore with their neighbours how TVBC can help accommodate the unmet needs of the area. 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.

Affordability in the Rural Areas

- 2.8 It is common knowledge that housing affordability in the south-east region is worsening and this includes within Test Valley where the latest house price to earnings data shows for the district as a whole that house prices are on average 10.6 times average earnings the highest in the Borough to date and increasing, from a ratio of 4.93 back in 1997.
- 2.9 Whilst the district wide house price to earning ratio already does not show a positive picture, the aggregated data for the district as a whole hides the particularly acute crisis in affordability within the rural areas of the district which will stymie the sustainability and vitality of rural settlements, such as Stockbridge and its catchment, if it is not addressed. National data suggests average house prices



are 8.6 times the average earning in rural areas compared to 7.4 times in urban areas. Nationally, the proportion of persons over 65 in rural areas is also 8% higher than in urban areas.²

- 2.10 Our earlier representation to the Refined Issues and Options Consultation in June 2020 demonstrated how the population of Stockbridge Parish is aging with 41% of the Parish aged 65 and over, with an expectation for this to increase to 43.5% by 2021. Furthermore, it showed that occupancy rates were significantly below the district average suggesting there is a lack of smaller properties for people to downsize to in the locality. It also confirmed that average house prices in Stockbridge at that time (August 2020) were £689,322. A review of the same data today (April 2022) suggests average values in the area of £782,535, ³ an almost £100,000 increase in less than two years, equating to 23.5 the average earnings in the Borough⁴. This compares to the District median house price of £315,000 quoted in the SHMA. This compares to the average in Andover of £363,357⁵, £502.533 in Romsey and £610,077 in Winchester.⁶ The Zoopla 'heatmap' of average house prices clearly indicates that Stockbridge is distinctly the most expensive place to buy a home anywhere in the area.
- 2.11 This suggests a major disparity between the house price growth in the urban areas of Andover and Romsey and other areas, where growth has historically been focused, and the rural areas where growth has been restricted, such as at Stockbridge. Indeed, a review of historic records shows that the quantum of housing stock in Stockbridge has changed very little in nearly 200 years. It indicates that strategies to focus growth at Andover and Romsey in the past have had some success at managing housing affordability in those areas, however this has come at the expense of affordability within the rural areas, and particularly around Stockbridge where affordability has significantly worsened to a point where Stockbridge is now the least affordable location in the area.
- 2.12 It is difficult to quantify the number of people that both live and work in Stockbridge. However, it is clear that a high proportion of employment in Stockbridge itself derives from retail and hospitality work, supplemented by work in work in agriculture and supporting business. The employment figures for Stockbridge (as presented in the 2021 Stockbridge Parish Profile) shows 22% of jobs are in accommodation & food services and 17.6% are in retail. These trades are unlikely to pay above the district average and in any cases will pay significantly below the average. It is therefore very unlikely

² DEFRA, Statistical Digest of Rural England (November 2021) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1043504/09_Statistical_Digest_of_ Rural_England_2021_November_edition.pdf [accessed 01.04.22]

³ https://www.zoopla.co.uk/market/hampshire/stockbridge/?q=stockbridge [accessed 01.04.22]

⁴ Average earnings are £33,186 based on the ONS Table 5b - Median gross annual (where available) residence-based earnings by local authority district, England and Wales, 2002 to 2021 (£)

⁵ https://www.zoopla.co.uk/market/andover/?q=andover [accessed 07.04.22]

⁶ https://www.zoopla.co.uk/market/romsey/?q=romsey [accessed 07.04.22]

⁷ https://www.visionofbritain.org.uk/unit/10162221/cube/HOUSES [accessed 07.04.22]



that most people that currently work in Stockbridge can afford to own their own home in the settlement.

- 2.13 There is also an evident lack of affordable housing within Stockbridge Parish. According to data from Hampshire Home Choice,⁸ average waiting times for an affordable home in Stockbridge is currently 129 weeks. The quantum of let affordable housing in Stockbridge Parish is also only 17 properties, 13 of which are 1bed flats. There is clearly a dire shortage of affordable housing in Stockbridge, particularly for young and growing families, which inevitably forces those on lower incomes out of the village. There is clearly an acute need for affordable housing in Stockbridge which delivery of new homes in the settlement will help solve.
- 2.14 There are therefore compelling reasons for Test Valley to direct new housing growth to sustainable rural settlements within the borough, and particularly Stockbridge. Whilst supporting the draft plan's recognition at 3.12 that the rural areas face 'challenges' in terms of housing supply and affordability and the risks this can pose to rural settlement vitality, the plan should go further and explicitly recognise the affordability crisis in the Borough's rural areas and, to address this crisis, its focus should be on Option E which should enable the growth of rural settlements.

⁸



3.0 STOCKBRIDGE AND THE SPATIAL STRATEGY

3.1 Highwood strongly support the Council's confirmation that they will be pursuing a strategy that includes directing development to Support the Largest Settlements (option E). We also support the commitment to

Maintaining and enhancing the roles of our larger urban and rural settlements through accommodating development that meets the needs of local communities and supports existing accessible facilities.

Sustainable development of new homes at Stockbridge, the largest and most sustainable rural settlement located at the heart of Test Valley's rural area, perfectly fits with the Draft Local Plan's Spatial Strategy and the vision.

3.2 We also support the SA conclusion that option E best achieves the Sustainability Objectives and hence should be the option of focus for the spatial strategy. Stockbridge, as the most sustainable Tier 2 settlement with unique characteristics as set out below, and acute affordability challenges, should be a key focus for growth in order to maintain its critical role and function for the wider rural area of Test Valley which it supports.

Settlement Hierarchy Assessment

- 3.3 Highwood support the reassessment of the settlement hierarchy and agree that Stockbridge should be categorised as the most sustainable settlement in the borough after only Romsey and Andover. However, it is considered that there needs to be refinement to the hierarchy assessment to recognize a number of factors that distinguish Stockbridge from other settlements included in Tier 2.
 - Sustainability and access to local facilities
- 3.4 Highwood agree with the Assessment at 4.9 of the Settlement Hierarchy Topic paper that confirms Stockbridge has access to all the key facilities and services that the local rural community rely on. However, the assessment, including the detailed assessment at Table 12 of the Hierarchy Assessment, underplays the number and diversity of facilities on offer in Stockbridge. For example, Stockbridge benefits from a secondary school (Test Valley School) but Table 12 suggests no such access. It also fails to recognise any 'other shops' despite Stockbridge benefitting from a range of comparison retailers. Appendix 2 indicates spatially the location of the many services in the village, which also includes a preschool, primary and secondary school, multiple convenience and comparison retailers, restaurants and public houses, as well as services such as doctors' surgery, two churches and community facilities. Furthermore, these facilities are highly focused in the historic village core, making access to the facilities within easy walking distance for all residents.



- 3.5 For its size and position, Stockbridge clearly has a disproportionate level of facilities and services for its currently modest size which support the wider rural hinterland. The Hierarchy Assessment and Draft plan should properly reflect Stockbridge's sustainability and place it in a category separate to other smaller settlements.
 - Accessibility and Public Transport
- 3.6 Highwood do however disagree with the 'Medium' categorisation given to Stockbridge for its access to public transport.
- 3.7 Firstly, in terms of bus transport, Stockbridge benefits from an exceptional level of service by local busses, particularly given its size. The below table sets out the main regular bus services and demonstrates that they provide a reliable, regular service that can be viably used for residents to access jobs and services in larger nearby settlements, most notably Winchester.

Bus Service	Frequency			
	Mon-Fri	Sat	Sun	
Total Per Day:	21 per day ⁹	12	0	

- 3.8 The journey time by bus from Stockbridge to Winchester is between 26 and 38 minutes (depending on service used). This is comparable to the time for services from the outskirts of Andover into Andover center, which take between 21 and 46 minutes. The bus service to Winchester also provides access to tertiary education opportunities at Peter Symonds College and the University of Winchester. Similarly, to drive from Stockbridge to Winchester train station at peak times (8.30am) takes roughly 20 minutes.¹⁰
- 3.9 Access to Winchester rail station also provides a faster and more regular rail service to other settlements along the south coast and London than its equivalent in Andover. Winchester provides circa three direct trains to London Waterloo an hour throughout the day with more frequent services (circa every 10 minutes) at the morning peak. This includes fast services of an hour to London Waterloo as well as stopping services which serve other key locations like Basingstoke and Woking. Winchester also benefits from a regular Cross Country service providing direct trains to Reading, Birmingham and Manchester. This compares to less frequent services to London Waterloo from Andover which all take over and hour and often include changes at Basingstoke (normally onto trains that left from Winchester). Train services conveniently accessible from Stockbridge are demonstrably better than those from Andover.

⁹ Except on Monday and Tuesday when there are 19 per day. See appendix 3 for full breakdown of bus services.

¹⁰ Google Maps with Live traffic data - https://tinyurl.com/mpzvuawy [accessed 01.04.22]



- 3.10 Stockbridge also benefits from its location on the National Cycle network route 246 which provides offroad access to Romsey to the south and Andover to the north within less than an hour's cycle. Winchester is also accessible by bike via quiet country roads in less than an hour.
- 3.11 Firstly, the assessment of Stockbridge as only having medium access to public transport, particularly when compared to the other tier 2 settlements, is considered wrong and does not reflect the regular bus service to nearby settlements and the access this in turn provides to excellent rail services in Winchester and all of the services it offers.
- 3.12 Secondly, the assessment needs to consider the wider accessibility of Stockbridge to surrounding settlements, and particularly Winchester, which shows that, for a rural settlement, it has exceptional accessibility by car and bus.
- 3.13 The growth of the village also provides opportunity to improve the viability of existing services and potential provision of new services and infrastructure which can further enhance the settlements access to facilities and services by sustainable transport modes. This is not recognised in the assessment.
 - Comparison to other settlements in Tier 2
- 3.14 Stockbridge also demonstrably performs better in terms of the range and access to facilities than any of the other eight Tier 2 settlements. Based on the assessment at Table 12 of the Hierarchy Assessment Stockbridge has access to sixteen facilities, including all key facilities; more than any of the other Tier 2 settlements. This is without taking account of the corrections to the table required as highlighted at paragraph 3.3 above.
- 3.15 Furthermore, as illustrated by figure 3.1 of the Draft Local Plan, the majority of other tier 2 settlements are essentially functionally a part of other large centers. North Baddesley, Vally Park, Chilworth and Nursling & Rownhams are essentially satellites of larger Romsey, Eastleigh/Chandler's Ford and Southampton respectively, whilst Charlton is essentially a suburb of Andover. Stockbridge on the other hand is largely self-sufficient and serves an important service function for its surrounding rural hinterland, as tacitly acknowledged at paragraph 1.3 of the Draft Plan. Therefore, maintaining its viability and sustainability as a service center is particularly critical.
- 3.16 Stockbridge therefore not only has a higher level of service and facility provision than all other Tier 2 settlements, functionally it also differs to the other Tier 2 settlements. This should be clearly reflected in the consideration of the settlement as part of the Settlement Hierarchy assessment and within the emerging Settlement Hierarchy Policy. Furthermore, and most importantly, Stockbridge's unique position compared to all the other Tier 2 settlement should also be explicitly recognised in the spatial strategy for the district when considering locations for development.



Strengthening the Settlement's role and function

- 3.17 As established above and recognised in the Local Plan, Stockbridge has a high number of facilities and excellent public transport provision which is currently disproportionate to its population. Based on the 2021 Stockbridge Parish Profile the population at 2020 was 553 residents. The profile essentially predicts that this population will remain unchanged to 2027. Furthermore, very unusually for the area, it shows an almost halving in parish population to 592 from a high of 1,066 in 1851. This compares to growing populations in similarly served market towns such as Bishops Waltham (2,265 pop in 1851 to 6,723 based on 2011 Census) and New Alresford (1,618 pop in 1851 to 5,431 based on 2011 census).
- 3.18 The Parish Profile also indicates an older and aging population, with those over 70 constituting nearly a quarter of the parish population. A higher proportion of residents are also economically inactive than the Borough average. This all paints a picture of a town with an ageing population and little prospect of growth. With house prices rising considerably, as described above, there is little prospect of this trend changing without intervention to allow new inward investment and housing for the next generation to survive.

3.19 Paragraph 79 of the NPPF states:

To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

- 3.20 The benefits of allowing sustainable growth of rural settlements is affirmed by a recent report Sustainable Communities: The Role of Housing in Strengthening the Rural Economy. Its national findings are reflected in many of the issues facing Stockbridge, namely an aging population and decreasing affordability. The report makes a number of recommendations which are relevant to TVBC and the village of Stockbridge. These include undertaking an assessment of the potential economic benefits for each rural village and its facilities of allowing sustainable growth (recommendation 5.2) and undertaking settlement specific Housing Needs Assessments to understand and plan for specific local needs in the rural area (recommendation 5.3).
- 3.21 Whilst Stockbridge currently does benefit from an impressive number of facilities for its size, without growth, this is not guaranteed into the future. For example, Test Valley secondary school can accommodate 156 admissions per year. However, data obtained from Hampshire County Council (HCC) shows that in recent year, the highest admission was 90 new pupils, less than 60% of capacity, with 2020 seeing only 55 pupils join the school. If admissions are maintained at this low level, as is

¹¹ https://www.visionofbritain.org.uk/unit/10162221/cube/TOT_POP [accessed 08.04.22]



likely given current demographic trends, the cost ineffectiveness of running the school and therefore the long term viability of the school is questionable. The school's catchment covers a large proportion of the rural part of the Borough and any risks to the school's viability are a considerable threat to the many rural communities it serves as well as Stockbridge. Local sustainable growth in Stockbridge would provide a greater pool of students equating to roughly 21 secondary school age students per 100 dwellings.¹²

- 3.22 Similarly, Stockbridge is reliant on a high number of inward visitors and tourists to maintain the viability of its shops and services. This is reflected in the employment figures for Stockbridge (as presented in the 2021 Stockbridge Parish Profile) which shows 22% of jobs are in accommodation & food services and 17.6% are in retail. Given average pay in these sectors tends to be lower many of those employed in these sectors are likely to commute into the village. Jobs in these sectors are also more likely to be seasonal and/or temporary. Without growth there are heightened risks to the long-term viability of these businesses given their reliance on tourists and visitors. Sustainable growth with new, more affordable, homes would provide regular and certain custom from local residents, improving the resilience and sustainability of the local economy. A higher local population would also provide a local and more diverse pool of potential employees as well reducing the reliance on inward commuting. Moreover, growth can provide opportunities for new and improved service provision by providing greater diversity and reliability of potential custom from a local population.
- 3.23 TVBC should recognise the significant risks and challenges to villages, and specifically Stockbridge, from continued constrained growth and stagnation and should adopt a Spatial strategy that addresses these challenges by allocating housing to sustainable rural communities, specifically Stockbridge given its functional importance at the heart of the rural borough.

The Housing Market Areas

- 3.24 We support the re-examination of the Strategic Housing Market Areas (HMAs) and do not have any particular comment on the revised HMA boundary and the allocation of housing therein.
- 3.25 However, it should be remembered that whilst the spatial definition of HMAs is a useful tool, as the SHMA report recognises 'The location of where the one market begins and the other ends is to some degree blurred and, as is the case with any housing market area, the boundaries of which typically overlap.' The SHMA goes onto identify that the A30 area, on which Stockbridge sits, is clearly a transition zone between the north and south HMAs.

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¹² Based on *HCC Development Contributions towards Children's Services Facilities* document – table at page 6.



3.26 Stockbridge clearly sits within the transition zone between the HMAs meaning it has an opportunity to serve the housing needs of both areas, whilst also strengthening the role and function of Stockbridge itself. This includes potentially helping to meet some of the unmet needs arising from Southampton and the wider South Hampshire region. The Spatial Strategy for the borough should recognise the unique position Stockbridge within the transitory zone between HMAs which means it is ideally placed to help meet needs in both areas.

Summary

3.27 Overall, we strongly support the suggestion at 3.9 and 3.12 that the spatial strategy will pursue growth within the Borough larger urban and rural community. We contend that Stockbridge should be a critical focus for housing growth in rural communities having a unique set of opportunities and challenges which planning for new homes would unlock and address.



4.0 DEVELOPMENT AT TEST VALLEY SCHOOL

- 4.1 The land at Test Valley school (sites 236 and 237 in the TVBC SHELAA) represent an ideal opportunity to provide sustainable growth in Stockbridge. Development of the site can provide:
 - ✓ Delivery of a significant amount of affordable housing likely to be more than triple the affordable housing on offer in the settlement, which will include starter homes for young families to help address the dire need for affordable homes in the area.
 - ✓ Support for local businesses and services from a pool of new local residents providing regular yearround custom, reversing the stagnant population growth in the settlement
 - ✓ Support for local schools from young families moving to the area
 - ✓ Potential to deliver improvements to adjoining school, including new sports pitches to the latest Sports England standards, an athletics track and safer and more convenient school drop off and pick up zone.
 - ✓ Increased investment in community infrastructure arising from likely developer contributions as well as council tax receipts.
 - ✓ High quality design from a local SME that respects the heritage and landscape of the settlement.
- 4.2 The site is also not constrained by any ecological or flood risk constraints, unlike much of the borough and also provides opportunities for significant ecological enhancement. It can also address its own nitrogen load arising from the development (with potential to provide offsetting for other development).
- 4.3 Highwood are a local developer based in Romsey well known for working with and supporting the communities that they operate in. Stockbridge is an ideal location for new development, for the reasons set out above, and development of the site represents a natural extension to Stockbridge that can protect the local environmental and landscape, whilst provided much needed sustainable growth within the community.

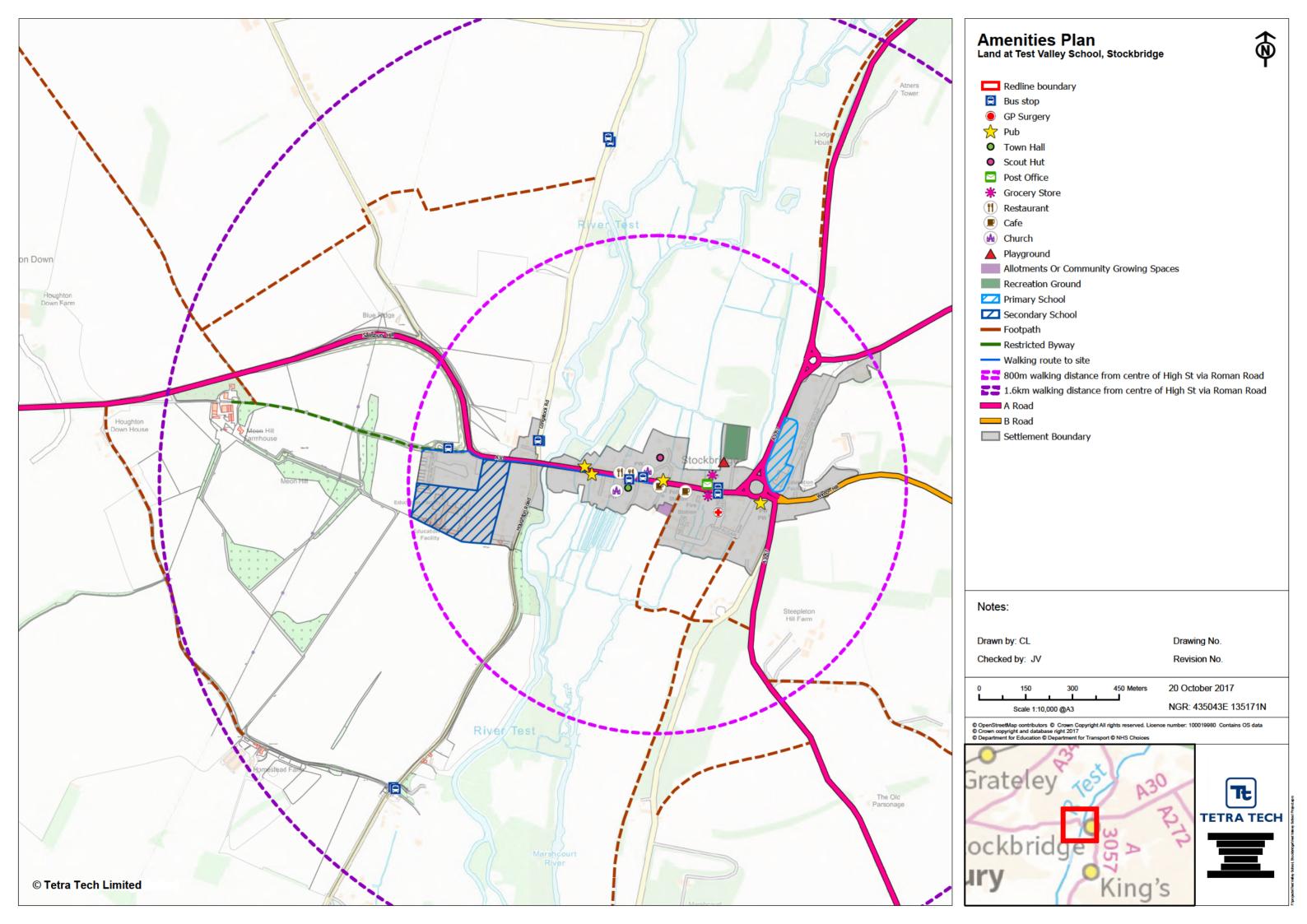


5.0 CONCLUSION

- 5.1 Highwood have welcomed the opportunity to participate in the TVBC Draft Local Plan 2040 Regulation 18 (Stage 1) consultation. We support the wider distribution of development away from just Romsey and Andover and in particular strongly support a strategy which seeks to direct growth to the larger sustainable rural settlements and in particular Stockbridge, which also benefits from employment opportunities and good public service provision. We agree with the Sustainability Appraisal which confirms option E 'Supporting the Largest Settlements' best achieves the Sustainability Objectives.
- 5.2 For the seasons 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.
- 5.3 The plan also needs to recognise the affordability crisis in the rural area of the borough, and particularly in Stockbridge which reinforces the need to consider a higher housing number and a spatial strategy approach which provides for growth in rural settlements.
- 5.4 We also have shown that Stockbridge in particular has a number of opportunities and threats which sustainable housing growth will help unlock and overcome. Stockbridge is demonstrably unique in the Borough due to its central location, the critical function it plays in serving the rural hinterland of the bough and the challenges it faces as a result of an ageing population and house prices that mean a home in Stockbridge is unattainable for the vast majority of people. The settlement hierarchy and spatial strategy in the plan should explicitly recognise Stockbridge's unique position compared to the other Tier 2 settlements and allocate housing to the settlement to provide for its sustainable growth.
- 5.5 The SHELAA shows that sites 236 and 237 at Test Valley school are appropriate to accommodate growth sustainable at Stockbridge, not being constrained by any overriding issues. Highwood would welcome opportunities to discuss the opportunities available from the site with TVBC and the local community.



APPENDIX 1 - PLAN OF SERVICES AND FACILITIES IN STOCKBRIDGE





APPENDIX 2 - BUSES FROM STOCKBRIDGE



Bus Service	Route		•	
		Mon-Fri	Sat	Sun
287	Test Valley School - Salisbury	15.40	-	-
(Test Valley School)		1 Daily		
	Salisbury – Test Valley School	08.30	-	-
		1 Daily		
7	Winchester - Salisbury	09.40	-	-
(Town Hall, High Street, West- Bound)		1 Daily		
7	Salisbury - Winchester	15.13	-	-
(St Peters Church, High Street, East-Bound)		1 Daily		
15	Stockbridge - Andover	09.00	09.50	-
(St Peters Church, High Street,		12.00	12.50	
East-Bound)		2 Daily	15.50	
			3 Daily	
15	Andover – Stockbridge	11.53	09.43	-
(Town Hall, High Street, West-		1 Daily	12.43	
Bound)			15.43	
			3 Daily	
16	Winchester - Houghton	08.35	09.25	-
(Town Hall, High Street, West-		10.55	12.55	
Bound)		12.58	15.55	
		3 Daily	3 Daily	
16	Houghton - Winchester	09.00	09.55	-
(St Peters Church, East-Bound)		11.00	13.20	
		13.20	16.20	
		3 Daily	3 Daily	
54	Romsey – Wherwell	13.00	-	-
(Town Hall, West-Bound)		1 Daily:		
		Tues,		
		Wed, Fri		
54	Wherwell – Romsey	09.30	-	-
(St Peters Church, East Bound)		1 Daily:		
		Tues,		
		Wed, Fri		
68	Winchester - Salisbury	14.05	-	-
(Town Hall, West-Bound)		17.07		
		2 Daily		
68	Britford – Winchester	08.22	-	-
(St Peters Church, East Bound)		08.32		
		10.52		
		3 Daily		
853	Andover – Peter Symonds	09.18	-	-
(St Peters Church, East Bound)		1 Daily		



Total Per Day:	21 per	12	0
	day*		

^{*}Except on Monday and Tuesday when there are 19 per day as the #54 does not run those days.

Andover Train Station (From Andover)

- From Picket Piece (Fluens Yard, buses 13/13a) upto 46 minutes.
- From Picket Twenty (Mercury Drive, bus P20) upto 35 minutes.
- From Enham Alamein (The Green, buses 1/7/C3/C8) upto 45 minutes.
- From East Anton (Pasture Walk, bus 6) upto 33 minutes

Winchester Train Station (From Stockbridge)

• From St Peter's Church, Stockbridge (Buses 7, 16, 68) - Between 26 - 38 minutes

Appendix B Letter from HiSP Multi Academy Trust to TVBC Stage 2 Regulation 18 Consultation





Interim CEO - David Pike

Test Valley Borough Council
Planning Policy & Economic Dev. Service
Beech Hurst
Weyhill Road
Andover
SP10 3AJ



CONFIDENTIAL

25[™] March 2024

Dear Sir / Madam

WITHOUT PREJUDICE

I am writing to you in my capacity as the Interim CEO of the HISP Multi Academy Trust. We are a Trust that currently operates several schools within Hampshire. As of the 1st of February 2024, this includes Test Valley School at Stockbridge.

There are a number of specific issues that exist at the school and which we need to address:

- A. An October 2022 Ofsted Report categorised the school as 'Inadequate' in all regards.
- B. The school roll has been steadily falling, such that we have a school capacity of 780, yet only have 400 pupils.
- C. The school access arrangements are significantly sub-standard. There is no room for buses to enter the school premises and buses must arrive on a staggered basis. The last pupils have to wait some 40 minutes after the school bell to board their bus. Additionally, pupils have to walk down Roman Road to catch the buses and there have been a number of near misses in the bus turning area.
- D. The school grounds do not meet the requirements of DoE Building Bulletin 103 'Area Guidelines for Mainstream Schools '. In particular, we have a shortfall of some 1.3 hectares of soft outdoor PE space.
- E. There is a need for investment in the school buildings.
- F. Difficulties of recruiting teachers given the fact that Stockbridge has the highest average house prices in the County.

If these issues are not addressed, there is a very real danger that the school will have to close.

However, there is a potential solution to all of the above issues. We are working with, Highwood who control land around the school. We are working with them on a development masterplan, a draft of which is attached. The implementation of this masterplan would result in the following benefits for the school:

 The provision of a safe school access with room for all buses to be accommodated within school grounds and pupils being able to leave safely and promptly at the end of the school day.

- Substantially improved school grounds fully meeting or exceeding Bulletin 103 requirements.
- 3) Sustainably located new homes. These family homes will provide a much-needed boost to local pupil numbers and the affordable homes proposed will be able to attract new teachers if designated for key workers. This could be achieved by both a cascade provision within a \$106 agreement, to favour people who work within Stockbridge
- 4) The development will provide significant funds for investment in the school estate.
- 5) All of the above should provide the catalyst to turn around the fortunes of the school, which serves a key role in the central Test Valley area
- 6) Increased community provision

Consequently, we object to the failure of the 2040 Regulation 18 stage 2 Draft Local Plan to identify the land for development in accordance with the attached masterplan. We note that the background papers identify Stockbridge as the most sustainable settlement outside of Romsey and Andover. In itself, that would surely be grounds to identify it as a location for new development. However, given the very pressing need to address the issues as outlined above we strongly urge you allocate the land in accordance with the attached masterplan in the next published version of the plan.

Yours sincerely

David Pike

David Pike Interim CEO

Appendix C Concept Masterplan and Location Plan







