

Planning Policy

From: Aaron Smith <
Sent: 12 September 2018 16:47
To: Planning Policy
Subject: Local Plan Issues and Options - Response on behalf of VIVID Homes
Attachments: 180916-P1 TVBC Local Plan Issues and Options.pdf

Dear Sirs

On behalf of 'VIVID Homes', Fowler Architecture & Planning Ltd is pleased to have the opportunity to respond to the Next Local Plan Issues and Options Consultation and engage in the process of preparing the next Local Plan (LP) for the Borough.

Please find attached the written response. I would be grateful if you could confirm safe receipt of these representations add our contact details to your database to note that Fowlers are representing VIVID Homes.

Kind regards,

Aaron Smith BA(Hons) DipTP MRTPI

T (Direct):

F :-

FOWLER ARCHITECTURE AND PLANNING



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alternative approach which also reflects current and future demographic trends and market signals. 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.'

It is therefore clear that the standard method is the starting point, however that the local housing need assessment should fully review the demographic and market signal evidence to determine whether these are germane to the housing requirement, as well as any unmet needs from neighbouring areas. Until such time as a local housing need assessment is prepared by the LPA the Representor wishes to reserve judgement on this matter.

Q5: Should the Local Plan increase its housing requirement to help support economic growth? If yes, do you have any evidence to support this?

The decision to increase the housing requirement to help support economic growth should be informed by an up-to-date local housing needs assessment.

On the basis of paragraphs 3.19-2.21 and Figure 11 summarising commuting flows, there is a clear basis for the LP to consider an uplift for economic reasons to balance jobs and workers, and for any uplift to be met, in full. There are substantial in-commuting flows, particularly to northern Test Valley and from Wiltshire, as recognised in the response to Question 6 below concerning the definition of the Andover HMA which extends into Wiltshire (including the settlements of Tidworth and Ludgershall). Mindful that 20% of the population of the Andover HMA live outside of the Borough and the substantive in-commuting flows, an adjustment is required given the pronounced and significant affordability constraints and the differential between land prices, the larger the improvement in affordability needed and, therefore, the larger the additional supply response should be to address the signals.

Q6: Do you think the HMA boundary is broadly right? If not, how and why do you think it should be changed?

The LP will be evidenced by a local housing need assessment and the requirement to assess needs based on HMAs. The current LP Inspector considered the HMAs at paragraph 27:

'The SHMA acknowledges the distinction between the northern and southern parts of the area. This has been recognised for many years, and results from geography, the proximity of the southern part of the Borough to the South Hampshire region, and the need to maintain and encourage the self-containment of the Andover labour market. This is not an artificial distinction but a realistic appraisal of the situation on the ground, and is a reasonable approach.'

Any decision to maintain this geography, or propose a variance should be supported by evidence.

In this regard, it is noteworthy that the latest Wiltshire SHMA concludes that the Andover HMA extends into Wiltshire to cover the Ludgershall / Tidworth Market Town. This area accounts for 16,200 persons, equating to 19.1% of the total 84,900 persons within the HMA living within Wiltshire, a sizeable component within a closely defined geographic area. The Andover HMA is the only functional HMA surrounding Swindon and Wiltshire covers more than 1.0% of Wiltshire's population (3.5%).

Paragraph 5.5 of the Wiltshire SHMA is clear that the five housing market areas, including the Andover HMA at Ludgershall *“can be considered as separate housing market areas in the context of the NPPF.”* This is because at least two geographies for defining the housing market area agree, in the case of Ludgershall the area is within the Andover commuting and migration zones and is within the Andover functional HMA.

The Wiltshire SHMA Volume 1 ‘Defining the Housing Market Areas’ uses deleted 2007 CLG guidance as the basis to advocate a ‘best fit’ approach in paragraph 5.16 and 5.17. The deleted guidance supported a ‘best fit’ approximation for functional sub-regional housing market areas based on local authority administrative areas. This is contrary to the PPG that makes clear the functional HMA, as defined by the analysis, must form the basis and this should not subsequently be approximated as the expectation is that local authorities must work together to coordinate their approach.

Paragraph 5.22 of SHMA Volume 1 summarises that the decision to focus the Andover HMA on Test Valley:

“Whilst around 16,200 of Wiltshire’s residents live in the Andover HMA, this represents just under 20% of all residents in the HMA; and given that over three quarters of the area’s population (63,700 persons) are resident in Test Valley, it is likely that the Test Valley administrative area will provide the most appropriate “best fit” for Andover functional housing market area.”

In response, paragraph 5.25 continues to propose the identification of the Andover HMA within Wiltshire to the Salisbury HMA:

“Over 90% of the population of the Salisbury functional HMA live in Wiltshire. The remainder of the population is divided between the New Forest, East Dorset, Test Valley and elsewhere. Nearly one fifth of the Andover functional HMA population around the Ludgershall area live in Wiltshire, and the BRMA places Ludgershall with Salisbury. It is therefore appropriate to conclude that Salisbury area (including Ludgershall) represents the most appropriate “best fit” for Salisbury functional HMA.”

The Ludgershall / Tidworth Market Town represents the secondary settlement in population and scale within the functional HMA. The Market Town and environs has a population of around 16,200. This is second only to the principal settlement of Andover, which itself has 41,552 persons in 2016 within the Andover Town Council geography and around 65,000 when including closely-related surrounding wards. The population level of the Market Town will increase in the period to 2026 as development commitments exist as envisaged under the Wiltshire Core Strategy and emerging Wiltshire Housing Site Allocations DPD. The Market Town is functionally connected in both commuting flows and migration patterns with the Andover area, as recognised by the Wiltshire SHMA.

In summary, the LP must be founded upon a realisation of the actual geographies of the functional housing market area to provide the best arrangement for the local authorities to establish the evidence required to develop the planning. The Wiltshire SHMA recognises the Ludgershall area is within the Andover HMA and it is inappropriate to ignore opportunities for cross-boundary working with Wiltshire Council to deliver the correct planning outcomes.

Q7: Are there any other approaches to distributing development across the Borough that we should consider?

Evidenced-led distribution

The Framework at paragraph 77 confirms in rural areas *“planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.”*

In doing so, paragraph 78 confirms that *“to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”* thereby avoiding isolated homes in the countryside.

In addition, paragraph 78 requires LPAs through their planning policies that they *“should identify opportunities for villages to grow and thrive, especially where this will support local services.”* Whereby this assessment must have regard to the shared role of groups of smaller settlements where development in one village may support services in a village nearby.

To ensure a sound plan, the LP must further understand the needs and function of the rural communities; which accounts for a very significant element of the Borough’s total population. This is against the backdrop that PPG¹ confirms the relevant issues for local planning authorities when determining the roles which all rural settlements can play in delivering sustainable development. It is therefore appropriate and proportionate for the LP to give full consideration of the following matters as required by the Framework in determining where growth should be distributed:

- Assessing evidence of local housing need.
- An understanding of the level of development required to support a thriving rural community by ensuring local services and facilities remain, or become viable.
- Assessing the availability of land within the SHELAA.
- Assessing the implications of delivery in locations where the Framework NPPF indicates development should be restricted.
- Assessing the dual role many settlements provide in delivering services to nearby settlement, and the benefits of development in one village supporting services in a village nearby.
- Recognising the value of the LP delivering a greater percentage of the overall housing requirement within the most sustainable villages.

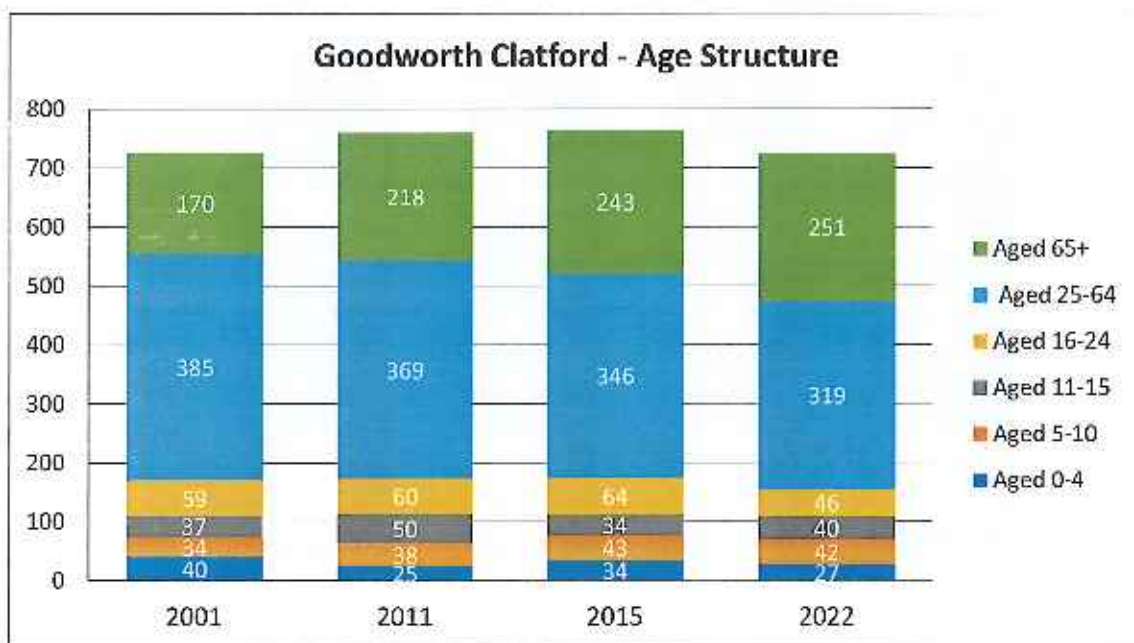
In relation to **demographic considerations** relevant to **Goodworth Clatford** in determining whether a housing allocation(s) should be identified at the settlement, the settlement has a population of 764 according to the Hampshire Small-Area Population Forecast (SAPF) 2016-based estimate. The base of the SAPF is taken from the 2011 census. The estimated population of the parish in 2016 equates to 0.61% of the borough’s total of 123,446.

¹ TD: 50-001-20160519

Table 1 - Census (2001 & 2011) and Estimated Population and Dwellings in Goodworth Clatford Parish 2016-2023 (Hampshire SAPF 2016-based)

	2001	2011	2016	2017	2018	2019	2020	2021	2022	2023
Population	740	760	754	748	741	733	728	723	715	711
% change over 2011			-0.8%	-1.6%	-2.5%	-3.6%	-4.2%	-4.9%	-5.9%	-6.4%
Households	309	332								
Dwellings	325	345	335	356	357	358	360	362	363	365
Persons per dwelling	2.28	2.20	2.25	2.10	2.08	2.05	2.02	2.00	1.97	1.95

Table 1 shows growth in the population of the parish of 20 usual residents between 2001 and 2011 (2.7%). Within this period the number of dwellings also increased by 20 units, however the occupancy rating of dwellings declined from 2.28 to 2.20 persons per dwelling. As a result, fewer people live in each property and this trend is projected to continue to 1.95 persons per dwelling in 2023 based on the SAPF estimate. The table also shows an estimated decrease in population of 49 persons (-6.4%) in the period 2011-2023 based on the SAPF. The SAPF estimate also forecasts a minor growth of 20 dwellings from 345 to 365 in this period. The minor annual increment in dwellings and a declining population highlights a general trend towards declining household size. A 6.4% decline in population contrasts with a projected increase in the population of the Borough in the same period to 134,669 persons. A population decline is also projected across the ward of Anna by 3.3% up to 2020².



² Anna Ward Profile 'Key Population Information' page 3

Figure 1 – Goodworth Clatford Parish Age Structure [Source ‘Age’ 2001 Census (UV04) ‘Age by Single Year’ 2011 Census (QS103EW)] and Hampshire SAPF Forecasts for 2015 and 2022

Between 2001 and 2011, Figure 1 (overleaf) shows Goodworth Clatford has seen the largest numerical growth in the retirement age population (65+) of 48 persons. Increases were also witnessed in persons aged 5-10 (4 persons), aged 11-15 (13 persons) and aged 16-24 (1 person). Two groups surveyed had a numerical decrease of -15 in those of nursery age and -16 aged 25-64.

Figure 1 includes the forecast population figures for 2015 and 2022 from the SAPF to provide a future demographic context. This forecasts an overall decline in the population to below 2001-levels arising from the reduction in the working-age population. The overall number of persons aged 0-15 is forecast to decline from 111 in 2011 to 109 in 2022, the working aged population 16-64 will decline by 14.9% from 429 in 2011 to 365 in 2022, whereas the retirement aged 65+ will increase by 15.1% from 218 in 2011 to 251 in 2022.

Figure 2 below shows the age groups in Goodworth Clatford by proportion in the 2001, 2011, 2015 and 2022 samples. Primary-aged persons aged 0-10 is projected to decline from 74 persons to 69 persons, a decline of -6.8% by 2022. Young persons (0-15) comprised 14.9% of Goodworth Clatford’s population in 2011; this is expected to increase slightly to 15.0% by 2022.

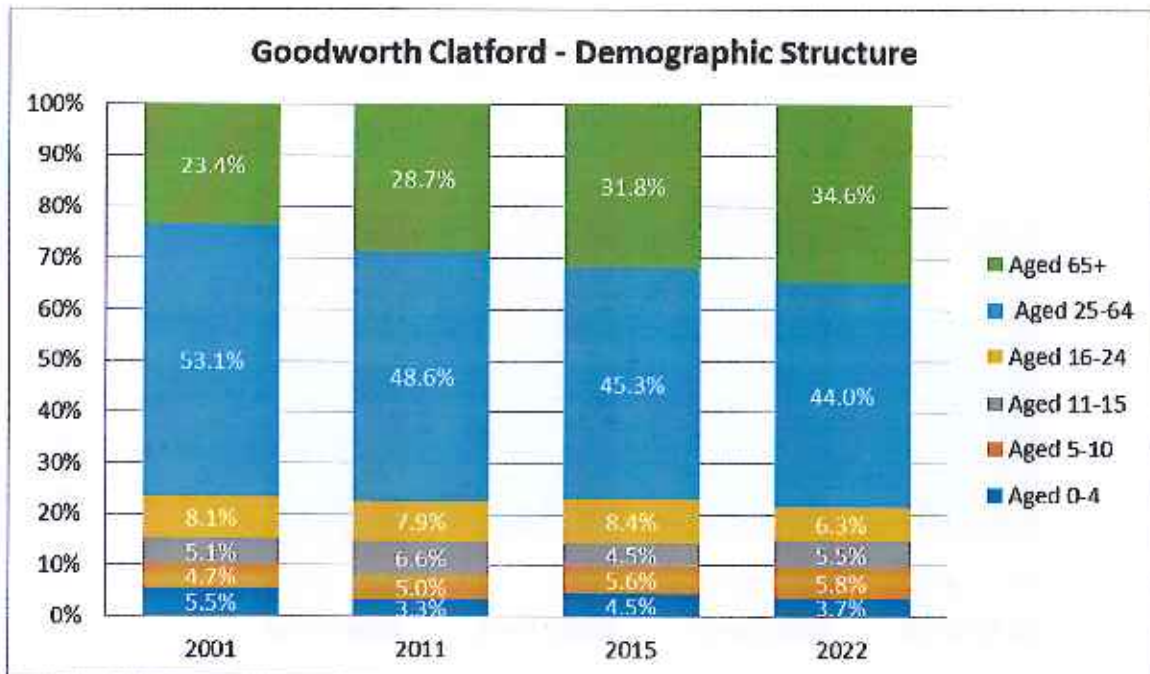


Figure 2 – Goodworth Clatford Demographic Structure [Source ONS Census Data 2001 & 2011] and Hampshire SAPF Forecasts for 2015 and 2022

In terms of the working aged population, young adults (16-24) comprised 7.9% of Goodworth Clatford’s population in 2011; this is expected to decline to 6.3% by 2022. The upper segment of the working aged population (25-64) comprised 46.8% of total population

in 2011; this is expected to decline to 44% by 2022. Overall the working aged population would decline from 56.5% in 2011 to 50.3% in 2022.

Those aged 65 and over comprised 28.7% of Goodworth Clatford's in 2011; this is expected to rise to 34.6% by 2022.

The Housing Needs Survey of Goodworth Clatford (undertaken in 2013) pinpoints the reduction in working age population to young people and families moving out of the area in search of a more 'affordable' home.

Figure 3 below compares the growth rates of different segments of the population in Goodworth Clatford with Test Valley between 2011 and the SAPF forecast for 2022.

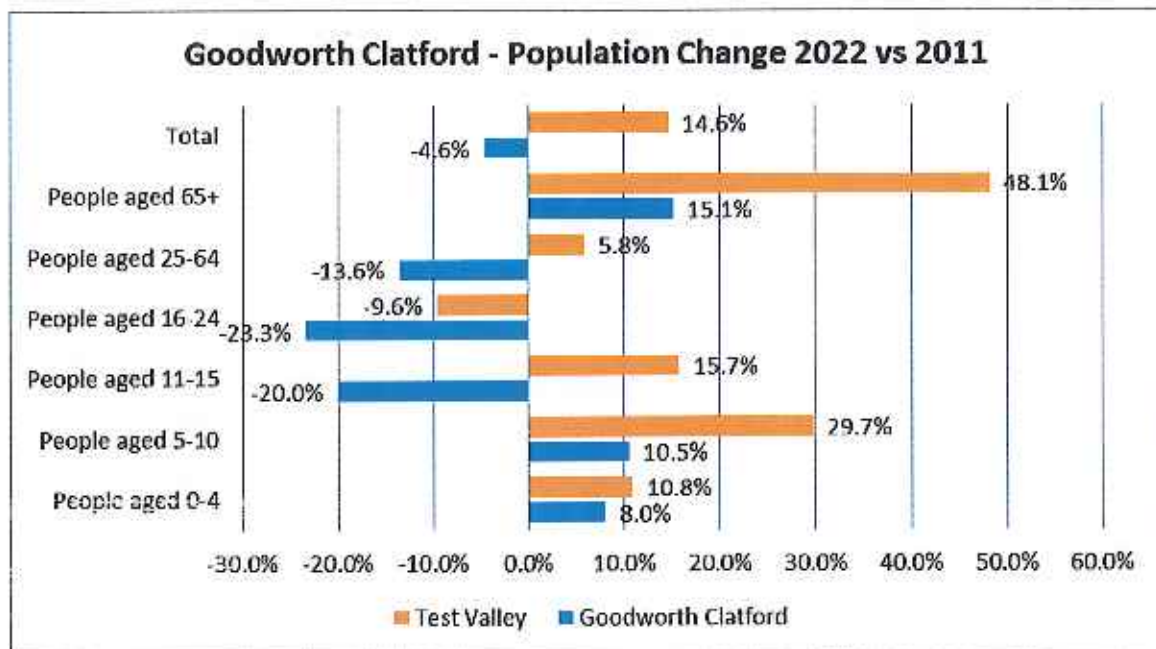


Figure 3 – Forecast Population Change Goodworth Clatford Parish and Test Valley Borough Council [Source ONS Census Data 2011 and Hampshire SAPF Forecasts for 2022]

Overall, the Borough is forecast to witness growth in all segments except persons aged 16-24. Goodworth Clatford is forecast to grow in those aged 0-4, 5-10 and 65+.

In Goodworth Clatford, the population aged 65+ is forecast to increase by 15.1%; this is less than the Borough which is expected to experience growth of 48.1% over the same period primarily because the parish already has a sizeable elderly population.

The decrease in the working age residents in Goodworth Clatford in both 16-24 and 25-65 age groups of -14.9% contrasts with 3.4% growth overall in Test Valley.

A decline of -20% in Goodworth Clatford for persons aged 11-15 contrasts with projected 15.7% growth in the Borough.

The increase of primary age persons of 10.5% in Goodworth Clatford is behind the Borough increase of 29.7%.

Finally, the 8% increase in the 0-4 age group reflects the Borough increase of 10.8%.

The demographic changes between 2001 and 2011 witnessing the growth of the retired population and reduction in the working aged population have important implications for Goodworth Clatford and how the settlement should plan to meet any housing needs. These changes are projected to continue beyond 2011 and the latest SAPF forecasts highlight the retirement aged population will be growing at a much faster rate than the Borough.

Figure 4 below shows the greatest levels of change in Goodworth Clatford in the period 2001 to 2011 has been the households comprising those aged 65+ with the highest increase (14.4%). The growth in the elderly population and decline in the working aged population has resulted in the most significant reduction in those households with dependent children by -11.5%. The number of single person households has increased by 10%, which is less than the Borough average of 21.2%.

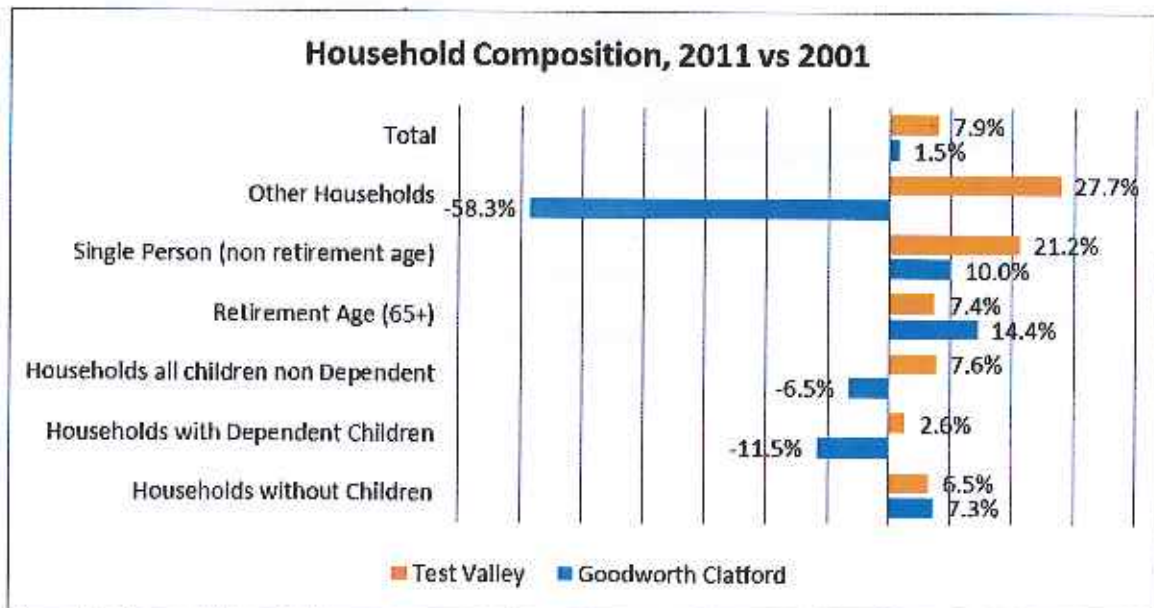


Figure 4 – Change in household composition 2011 vs 2001 [Source ONS Census Data QS113EW vs UV65]

Figure 5 below shows that the study area includes a marginally higher percentage of persons with long-term health problems or disability than the Borough averages. While this data do not quantify the specific problems or disabilities facing individuals, this may indicate a need for a specific percentage of homes to be provided under the Optional Housing Technical Standards (Category M4(2) and M4(3)) across a variety of tenures to meet likely future needs for housing for older and disabled people, which will increase over time owing to the projected growth in the older population.

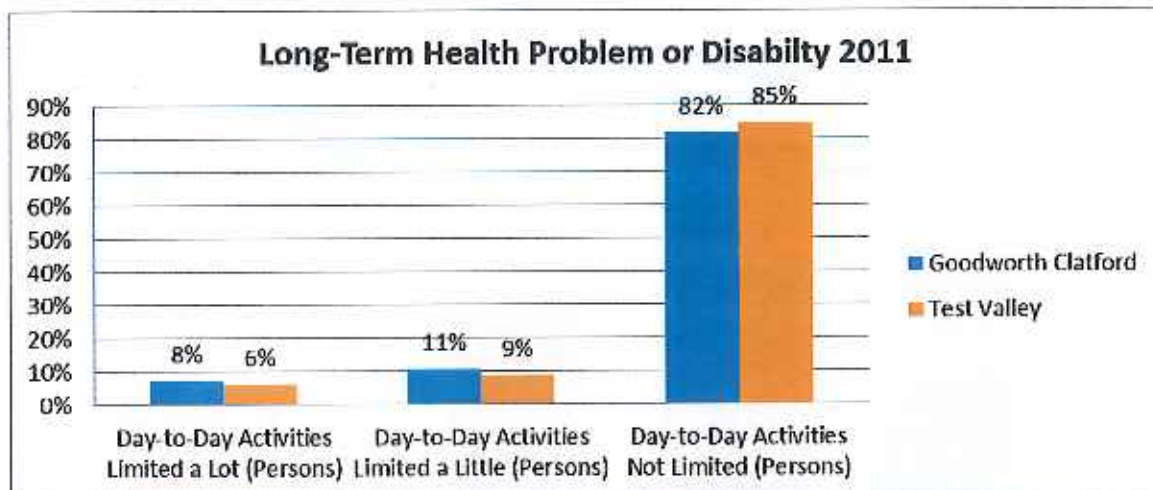


Figure 5 - Long-Term Health Problem or Disability [Source: ONS Census 2011 QS303EW]

In terms of levels of deprivation in the study area, the 2011 Census assess all households in the area at the time of the 2011 Census with deprivation dimensions. The dimensions of deprivation are indicators based on the four selected household characteristics - Employment (any member of a household not a full-time student is either unemployed or long-term sick); Education (no person in the household has at least level 2 education, and no person aged 16-18 is a full-time student); Health and disability (any person in the household has general health 'bad or very bad' or has a long term health problem.); and Housing (Household's accommodation is either overcrowded, with an occupancy rating -1 or less, or is in a shared dwelling, or has no central heating).

Having regard to the above analysis in relation to the Goodworth Clatford study area, based on the parish, we consider there are four key population issues:

- A projected decrease in population to below 2001-levels with an estimated -6.4% decrease in population forecast in the period 2011-2023
- A forecast -14.9% decline (64 person) in the working age population 2011-2022
- A forecast 15.1% increase (33 person) in the proportion of the population aged 65+ 2011-2022
- Onward trend towards an ageing population and a declining household size arising from greater levels of home under-occupation (forecast 1.96 persons per dwelling in 2022 compared to 2.20 in 2011)

Having regard to the PPG³, it is considered that these population issues are likely to challenge the community to retain local services and facilities. The right type(s) of housing in response to these issues can be essential to ensure the viable use of facilities.

In relation to **housing considerations** relevant to **Goodworth Clatford** in determining whether a housing allocation(s) should be identified at the settlement, Figure 6 shows that Goodworth Clatford has a higher than average concentration of detached dwelling types (60.5%) compared to the Borough (38.7%) and also semi-detached dwelling types (29.2%) to the Borough (25.9%). Such an increase is not unexpected for a rural settlement and is

³ LD: 50-001-20160519

reflective of the general patter of higher density housing (i.e. greater apartments and terraced housing) within urban areas.

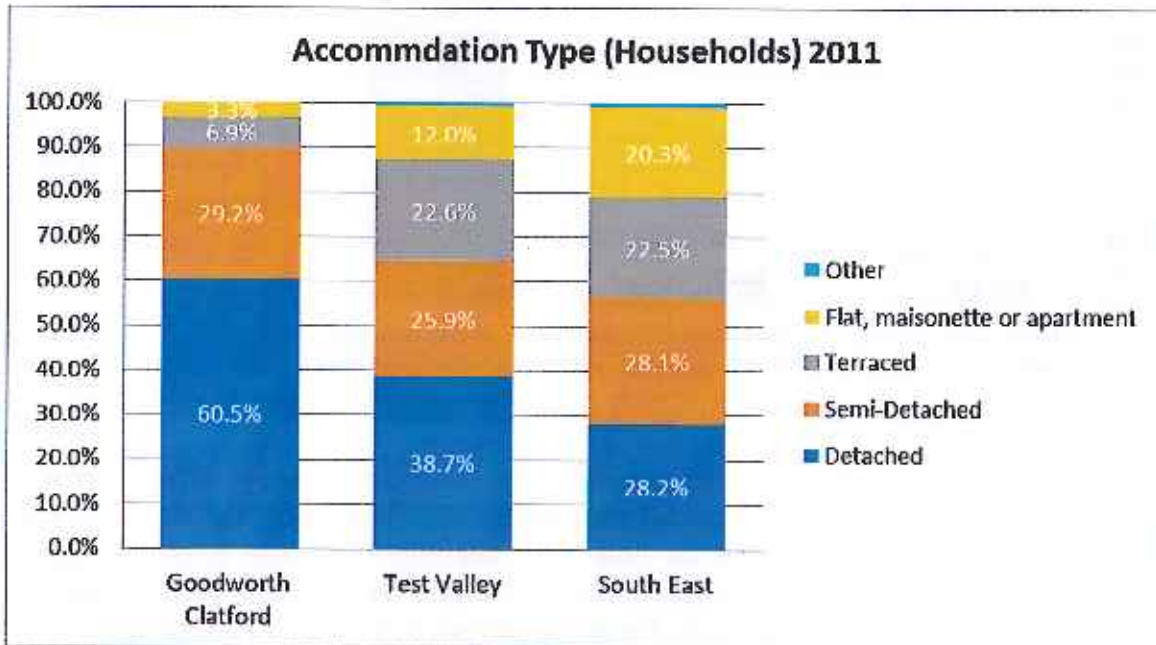


Figure 6 - Household Accommodation Type [Source ONS Census 2011 QS402EW]

The 2011 Census provides most up-to-date evidence on the number of bedrooms per dwelling and household occupancy rates. No comparable data is available from the 2001 Census. The dwelling stock in Goodworth Clatford comprises a high number of households containing 3 or more bedrooms. Figure 7 below shows 252 (75.9%) of the household spaces in 2011 with at least one usual resident contain 3 or more bedrooms. This reflects is higher than the Borough figures, which show 70.4% of households containing 3 or more bedrooms.

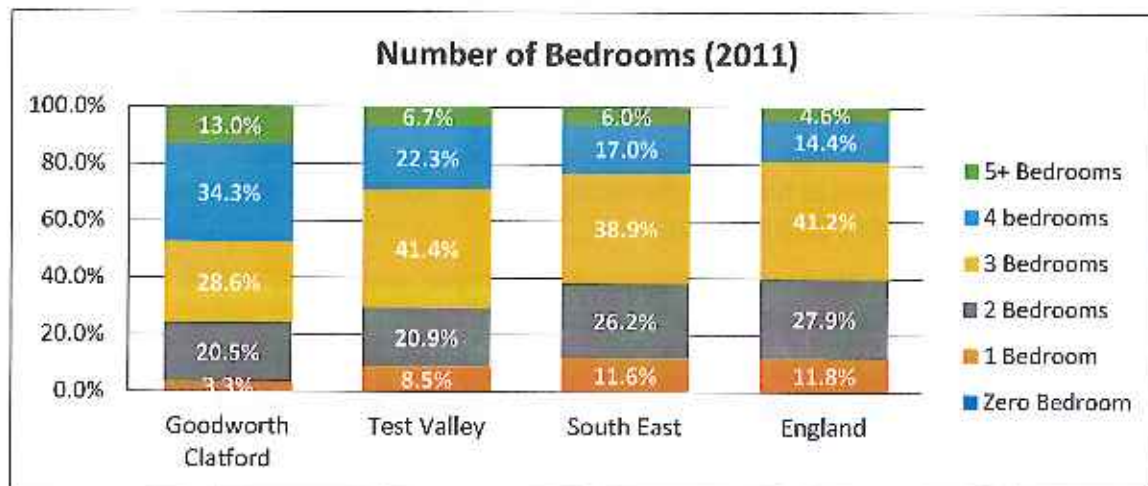


Figure 7 – Breakdown of dwellings by number of bedrooms [Source 2011 Census QS411EW]

is notable that the number of 1 bedroom dwellings comprises 3.3% of the total stock, which is below the Borough average of 8.5%. The quantum of one bedroom homes does not

reflect the number of single person households (over all age groups) which comprises some 24.7% of the total household spaces – furthermore around 42.5% of the older age population reside in one person households (2011 Census – QS111EW).

Of those bedrooms, Figure 8 highlights a very high under-occupancy rating for Goodworth Clatford. It identifies that 93 dwellings (28%) have 1 bedroom more than is required and 204 (61.4%) have 2+ bedrooms more than required, implying that 89.5% of total dwellings are under-occupied in Goodworth Clatford.

The level of under-occupation (2+ bedrooms) is significantly greater than the Borough and South East averages of 45.5% and 37.1% respectively. The level of under-occupation (2+ bedrooms) is significantly higher than the Borough average of 45.5%. Under-occupancy is a very familiar picture in rural villages, where older couples may live in a 3+ bedroom house because they either do not wish to downsize or there is no suitable property available locally to downsize.

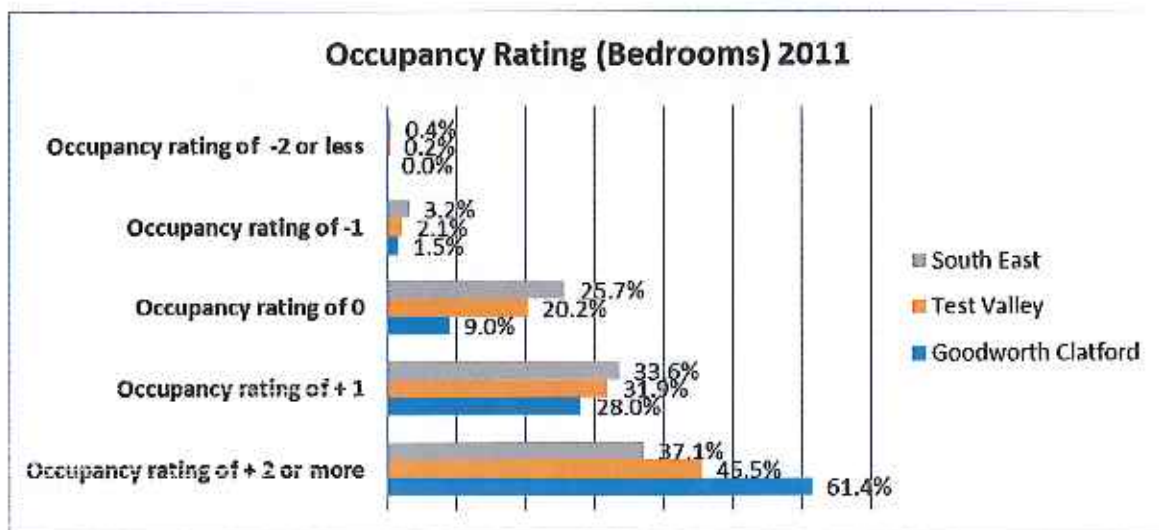


Figure 8 – Occupancy Rating [Source ONS Census 2011 QS412EW]

The proportion and occupancy of the housing stock has implications for the community when considering the continuation of the changing demographic. The very high percentage of under-occupied homes is likely to increase substantially with the growth in the ageing population and single person households. This is likely to lead to a lack of availability of suitable smaller homes for downsizers and young persons that will exacerbate issues of affordability.

Both at national and local authority level there have been a significant fall in the proportion of owner occupiers and corresponding growth of the private rented sector. In England, owner occupation has reduced from 68.7% to 63.3%, while locally in Goodworth Clatford Figure 9 shows this sector has reduced from 80% to 77.4%. The addition of 3 social rent and 2 shared ownership products between 2001 and 2011 has increase 'affordable housing' from 8.9% to 9.9%. Growth in the private rented sector has been the most pronounced

since 2001 throughout England, where this sector has grown in Goodworth Clatford from 6.3% to 8.7%.

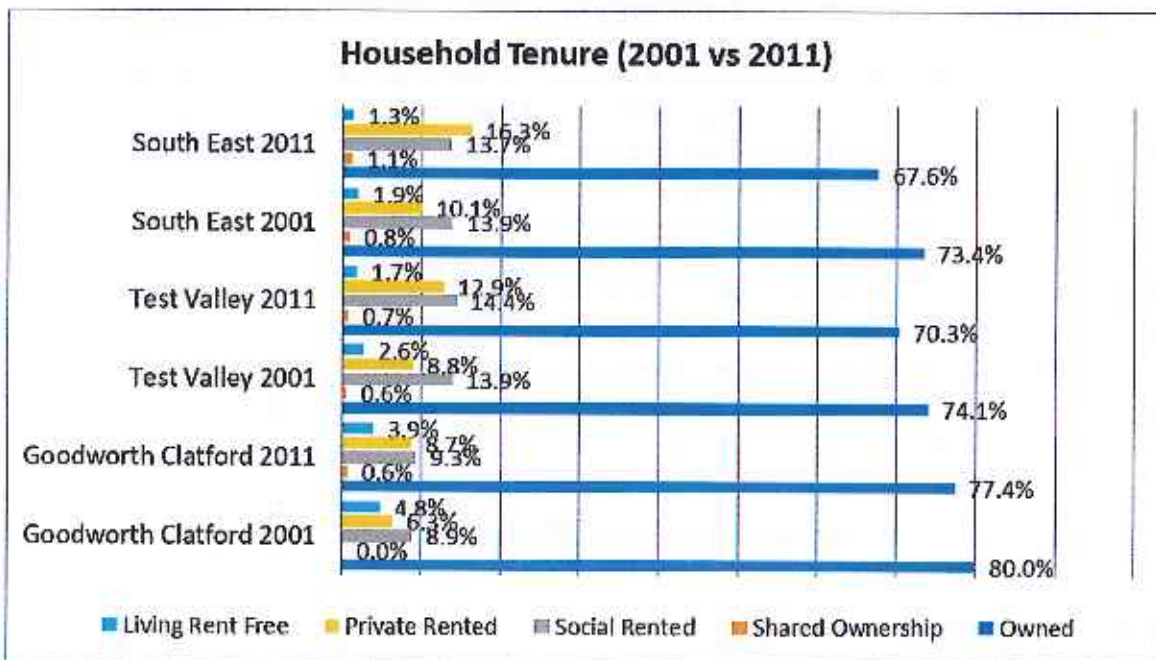


Figure 9 – Goodworth Clatford Tenure Profile [Source 2001 Census UV63 & 2011 Census QS405EW]

The 9.9% of the housing stock that is 'affordable housing' at Goodworth Clatford is less than the Borough and South East averages of 15% and 14.8% respectively, highlighting a potential under-supply.

The main reasons for this change in tenure balance between 2001 and 2011 are that:

- There has been a dramatic fall in first time buyers because of affordability, lending criteria especially the need for a 20% deposit or more and the general difficulty in obtaining a mortgage over since 2008;
- This has created a large increase in young households in the private rented sector because they cannot buy, along with the growth through buy to let as an investment particularly in the earlier part of the decade.

In terms of valuation of residential properties, Figure 10 below shows that 6.2% of Goodworth Clatford properties are at the lower end of the property market (Bands A and B). This compares to 22.2% for Test Valley as a whole. 43.3% of the parish's properties are in the middle range of the property market (Bands C to E). This compares to 60.8% across the whole borough. 50.4% of Goodworth Clatford's properties are at the higher end of the property market (Bands F to H). This compares to 17.1% of all Test Valley properties.

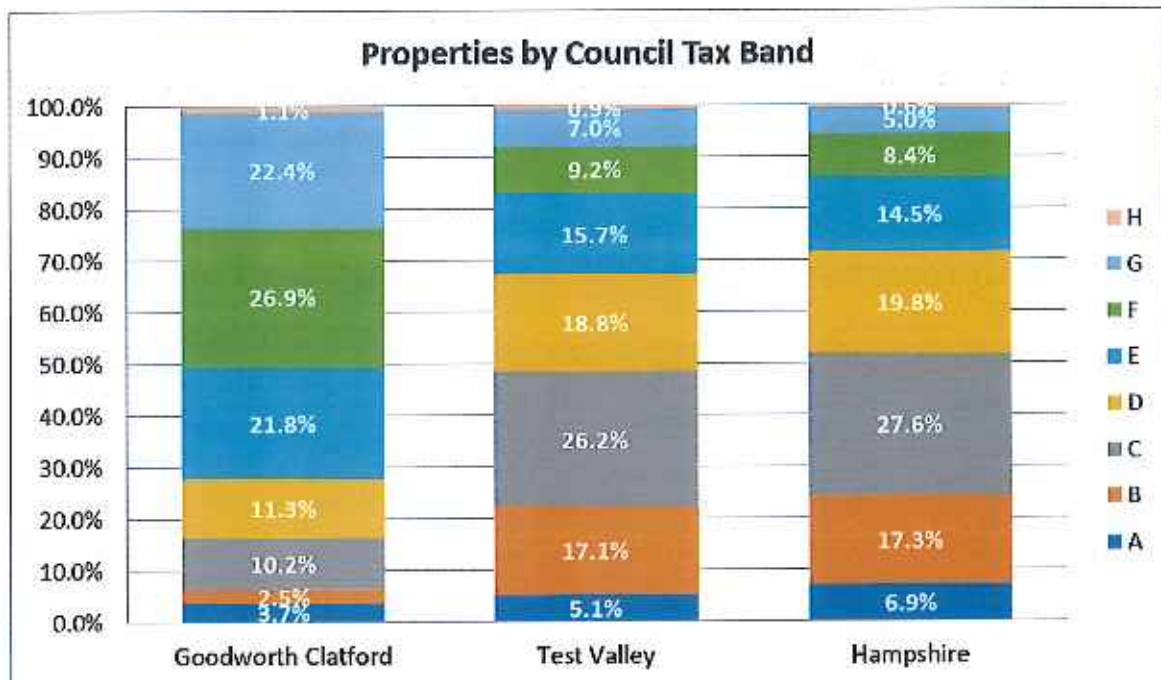


Figure 10 – Properties by Council Tax Band [Source Test Valley Profile 2016]

According to Zoopla [accessed 5th December 2016] the average price paid within the last 12-months for a house in Goodworth Clatford is £694,100 from 5 sales⁴, increasing by 3.63% in 12-months. This figure is significantly higher than the Hampshire average of £328,982. The mean average gross income for people ages 22-29 years in the UK is £21,884⁵. An 80% mortgage for a property priced at £653,000 is around 24 times the income of someone earning the average wage in this age group. The turnover of sales in Goodworth Clatford during the past 12-months is an estimated 2.5% of the dwelling stock of 355.

It is estimated⁶ that 38.2% of households in north rural Test Valley cannot afford to buy a private property. The north rural area includes the wards of Anna, Amport, Bourne Valley, Harewood, Over Wallop and Penton Bellinger.

In terms of housing need, there is a steadily high level of demand for affordable housing in Goodworth Clatford whereby the most recent data as of 1st December 2016 identified a need from 13 households with a local connection on the Hampshire Choice Housing Register for rental homes. The Housing Register – Table 2 - currently identifies 10 households requiring a one bedroom home and three requiring a two bedroom. Those needs arise from a range of ages of the Eldest Joint Applicant – Table 3. The bedroom need is always fluctuating as previous enquiries of the Register revealed a need for three and four bedroom properties.

⁴ <http://www.zoopla.co.uk/market/goodworth-clatford/?q=Goodworth%20Clatford%2C%20Hampshire>

⁵ ONS Annual Survey of Hours and Earnings, 2016 Provisional Results

<http://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/earningsandworkinghours/datasets/agegroupshouseholdtable6> - Dataset ID: AS11E: Table 6

⁶ Goodworth Clatford Parish Profile 2016

Housing need is prioritised according to the personal needs of the applicants with four priority bands 1-4. Band 1 is where there is a critical need to move and the current housing situation is seriously detrimental to health or welfare and interferes with quality of life to an intolerable degree. Band 4 is where there is a slight medical or welfare need to move. The current housing situation is detrimental to health and interferes with the quality of life to a low degree.

Table 3 – Hampshire Home Choice Applicants for Affordable Rental by Assessed Bedroom Need and Band [1st December 2016]

Priority Level	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Band 1 (Urgent)	0	0	0	0
Band 2 (High)	1	1	0	0
Band 3 (Medium)	5	2	0	0
Band 4 (Low)	4	0	0	0
Total	10	3	0	0

Table 3 – Hampshire Home Choice Applicants by Age of Eldest Joint Applicant Group and Assessed Bedroom Need [1st December 2016]

Age of eldest Joint Applicant Group	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
16-39	4	2	0	0
40-44	0	0	0	0
55+	6	1	0	0
Total	10	3	0	0

As a result of a longstanding need for affordable homes for local people, Test Valley Borough Council officers have been working with the Parish Council, Ward Members and the community since 2011 to agree a way forward to deliver rural affordable homes in the village of Goodworth Clatford. There have been a number of meetings held with the Parish Council and members of the community which have included presentations from Test Valley's housing team and Action Hampshire. These meetings were primarily looking at Exception sites for a scheme comprising 100% affordable homes, through the HARAH partnership, under Local Plan Policy COM8 for those with a local connection.

A parish Housing Needs Survey (HNS) was published in April 2013 by Action Hampshire following a consultation in February 2013 to all 351 households in the parish. While the original objective of the HNS was to focus on affordable tenures and the needs of downsizers, the survey did not target only those within those groups and consulted all households. The HNS therefore details the baseline conditions concerning the current housing situation across all tenures within the Study Area. The HNS should therefore be read in conjunction with this Statement as it provides the full assessment of local housing issues. A response rate of 151 (43%) was achieved which is a very representative sample, therefore providing an 'indication' of need as it is not a full census. This report provides a robust basis upon which to objectively understand the impacts of local demographic factors,

while assessing the needs for affordable housing in the community, with general commentary on wider housing market issues.

Table 4 - Goodworth Clatford Housing Needs Survey Indicative Home Size Requirements (all tenures) – source Housing Needs Survey April 2013 Fig.6.29

Bedrooms	One bed	Two bed	Three bed	Four bed	No Answer
Percentage Need	12%	41%	12%	12%	23%

The HNS identified an unmet need from 16 households in housing need – Table 4. The HNS analysis was that 7 of those households are eligible for an affordable property in Goodworth Clatford, of which 2 households were on the Housing Register, so the survey identified an additional 5 households in need. Adding these 5 households to those with a local connection to Goodworth Clatford on the Housing Register, the HNS concluded that there is a local housing need of at least 20 households in Goodworth Clatford for affordable housing. Having regard to the latest evidence on the Housing Choice Register the need remains for at least 15 – 20 affordable units in a range of tenures. The HNS also infers an unmet need of at least 9 households for open market housing in the locality (as those respondents are not eligible for affordable housing) and considers the needs for downsizers.

The unmet affordable housing need is a product of:

- High affordability issues in the locality whereby the average price paid for a property in the parish of Goodworth Clatford in the past year is around 25 times the income of someone earning the average wage of someone aged 22-29;
- Undersupply of affordable housing which equates to 9.9% of the local housing, stock which is significantly lower than the South East average of 14.8% and Borough average of 15%;
- A low-turnover of property, whereby 80% of HNS respondents have lived in the parish for greater than 5 years;
- A lack of suitable housing to meet local needs as the proportion of detached houses in the parish is significantly higher than the borough and England averages;
- A lack of smaller properties for people starting a home, or wishing to downsize, whereby the number of 1, 2 or 3 bedroom homes in the housing stock is significantly less than the Borough and England averages – Table 4; and
- A lack of smaller properties suitable for those with disability, health or access issues experienced by at least three households identified in the HNS.

It is important to note that, while the objectively assessed needs within HNS identified a demonstrable affordable need for 20 units, It recommended a small scheme for local people of around 6-8 units. This was because this represented the level of development the majority of the community indicated it would support. This is despite those surveyed⁷

⁷ HNS paragraphs 5.5 and 5.6

recognising that a range of housing would benefit the community, specifically affordable homes, housing for first-time buyers and housing for older people downsizing.

The HNS also explored the issue of local people who wished to downsize to a smaller property as the demographic evidence highlighted an ageing population. Provision is made within the village for older person homes, including a total of 19 properties at St Peter's Close⁸ built in 1998 providing managed accommodation for those over 60 years of age. The HNS identified 14 households who need to downsize in the future and a further 4 who may wish to downsize in the future. Of these 18 households, 3 explained they require specialist or adapted accommodation, care and/ or support.

A particular issue identified within the HNS was the high number of family members having moved out of the parish due to difficulties in finding a suitable home locally⁹. Goodworth Clatford has a declining working-age population. The HNS identified that this is a direct result of many young people and families having moved out of the parish in recent years in search for suitable and 'affordable' accommodation across all tenures. Furthermore, the latest SAPF highlights the trend of a declining population will continue. These factors have resulted in local people being unable to afford housing in the area in which they live and have grown up, particularly for those on lower incomes or first time buyers, hence the gradual decline in population as younger persons move away.

The HNS does indicate that population with a local connection that have moved away do want to return to the village. There are a range of social benefits in families remaining together, whether to preserve family connections or to assist with care for older generations. The HNS identified¹⁰ 125 people currently living elsewhere that may like to move back into Goodworth Clatford, representing a reduction in population by around 16.1%. These 125 households / individuals were not identified by the HNS to be interested / eligible for affordable housing and as a result this further reinforces the view that there is a lack of suitable and 'affordable' open market homes in Goodworth Clatford.

As previously, according to the Census, the parish witnessed population growth of 20 persons in the period 2001 – 2011. Notably, this growth occurred during a period where the housing stock increased by 20 dwellings – including a development of 7 affordable homes (3 x 2 bed bungalows, 2 x 2 bed houses and 1 x 3 bed house) on land Adjoining 1 Barrow Hill¹¹. However, the demographic data indicates that the limited scale of development has continued to reinforce existing suppressed patterns of household formation.

In terms of new development within the parish within the past five years, there has been a net gain of 2 dwellings arising from developments at Lorien¹² and Hithercroft¹³. It is also noted that the Council consented to the net loss of a dwelling on Barrow Hill¹⁴, in doing so a

⁸ <http://www.cognatum.co.uk/home/Properties-For-Sale/property-details.aspx?ID=52>

⁹ HNS paragraphs 6.3 to 6.8

¹⁰ HNS paragraph 6.8

¹¹ Full Planning Permission TVN.08776/I.W dated 19.04.2004

¹² Full Planning Permission 11/00224/FULLN

¹³ Full Planning Permission 11/01355/FULLN amended by 14/01416/FULJN

¹⁴ Full Planning Permission 15/02624/FULJN granted 28.01.2016

pair of semi-detached dwellings each containing two bedrooms will be replaced with a four bedroom dwelling. Recently a consented development at Summerfields on Barrow Hill¹⁵ approved the development of 4 no. 4 bedroom units, similarly a 4 bedroom dwelling was consented at The Pines on Barrow Hill¹⁶. No affordable housing contribution was required on any of these schemes in line with local and national policies.

It is therefore clear that the market-led range of housing types coming forward in Goodworth Clatford have not provided for local needs. In doing so, no affordable housing has been provided and the range of housetypes are not addressing the various population and housing challenges.

It is highly noteworthy that the emerging Goodworth Clatford Neighbourhood Plan could've addressed these challenges, including allocating land for housing to meet a range of local needs, however it choose not to do so.

In summary, with a low proportion of affordable and suitable housing stock meeting both 'affordable' and 'market' sector demand, high levels of under-occupation, a gradually declining population and an ageing population, there is an apparent pressing need to address this imbalance through a housing allocations at Goodworth Clatford on SHELAA site SHELAA64 for the following reasons:

- A demonstrable unmet housing need within the HNS from local people for at least 20 units of affordable housing and at least 9 open market housing units. The Hampshire Choice Housing Register identifies 13 households in need for rental affordable housing.
- A low turnover of relatively large expensive detached open market housing in the area
- A lack of smaller or suitable properties, particularly for people starting a home. This contributes to the high number of people who leave the area but wish to return and results in a continual decline in the working-age population
- A percentage of new homes should be delivered to 'accessible and adaptable' standards in line with the optional Category 2 in Building Regulations Part M. This will help to ensure that, over time, the mainstream housing stock provides a suitable setting in which older people can continue to live independently and where care can be provided.
- A lack of smaller properties suitable for those with disability, health or access issues

Question 7 conclusion

While the above assessment relates solely to Goodworth Clatford, our experiences of working in the Borough, most notably at Over Wallop¹⁷ has demonstrated that these challenges are likely to be shared with other rural communities. Clearly, the precise amount and type of housing required will be specific to each community, however a step change is required in Test Valley to grasp what the Framework is inviting the LPA to do, i.e. you

¹⁵ 17/01011/FULLN

¹⁶ 18/00192/FULLN

¹⁷ Land North West of Evans Close, Goodworth Clatford

"should identify opportunities for villages to grow and thrive, especially where this will support local services." To do so, the LP must be informed by an understanding of local population / housing challenges and local services and what development is actually required to maintain or enhance them. The scale of the housing development actually required to readdress these challenges at villages is of a scale to justify distribution according to needs and for the LP to identify opportunities through allocations. Reliance on the present market-led infill / redevelopments within settlement boundaries is insufficient in isolation to make a real difference to rural communities due to the limited scale of sites meaning no controls exist to ensure the delivery of the right types of housing through windfall development.

Q8: Do you have any comments on the approaches suggested above?

Community-led distribution

Paragraphs 11, 65, 66 and 67 of the Framework makes clear that it is the responsibility of the LP to identify land for homes. It is not the ambit of 'parishes to put forward the housing figure' which they will bring forward. To this end, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

Proportionate distribution to parishes

An approach for balanced distribution to parishes would be limited by the available services and facilities necessary to accommodate the additional residential populations. While there may be benefits in delivering proportionate growth, this growth may reinforce harmful impacts and could be constrained by assets of particular importance or protected areas. As outlined in the response to Question 7, distribution to rural parishes must be founded upon evidence in accordance with the fundamental principle within the Framework for planning policies to identify opportunities for villages to grow and thrive.

Local Plan allocations

With reference to paragraph 67 of the Framework, it is the objective for LPs to identify a sufficient supply of land for homes and mix of sites in order to deliver the housing requirement. The current LP successfully identifies a variety of allocations that have successfully guided the construction sector to deliver homes, particularly to Andover and Romsey which are the most sustainable settlements. There is significant merit in the Council continuing to decide which are the most appropriate locations, including in the rural areas in accordance with paragraphs 77 and 78 of the Framework, for housing through allocations, including the newly arising requirement to promote small and medium sized sites under paragraph 68(a) of the Framework.

New village

Clearly the Framework does not preclude LPAs considering new settlements under paragraph 72, however there is presently no evidence that such an approach would help

meet identified needs in a sustainable way given the range of opportunities available at the mains and main settlements. The primary disbenefits of a new village are the lead-in time to deliver the necessary infrastructure and creating the place and community. Consequently, a new village option cannot be a viable option in accordance with paragraph 67(a) of the Framework.

Mixed approach

A mixed approach cannot be discounted as the most appropriate means to identify a sufficient supply and mix of sites.

Conclusion

Q9: How should the settlement boundaries be defined in the next Local Plan?

The response to Question 7 makes clear that the LP cannot rely solely on settlement boundaries in order to achieve sustainable development in rural areas. The use of boundaries as a planning tool is supported, however there must be a recognition that the current approach has not actually delivered the right type of housing. This is inextricably linked to the absence of affordable housing being delivered within settlement boundaries in the rural communities as sites are of an insufficient size to trigger the affordable housing contribution as defined by the Framework. A positive approach of the LP is required to allocate land outside boundaries, including at SHELAA site reference SHELAA64 at Barrow Hill, Goodworth Clatford.

Q10: Do you think we should continue with seeking up to 40% of new homes to be affordable, or should we change the percentage?

The percentage should be justified by evidence of needs and the viability of delivering such provision on new developments. The percentage must also have regard to vacant building credit and the revised definition of affordable housing in Annex 2 of the Framework. The Representor looks forward to reviewing the LPA's justification for the preferred percentage in due course.

Q11: What should the trigger be for seeking affordable housing?

Paragraph 63 of the Framework confirms:

“Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).”

The LP must therefore be prepared to be consistent with this statement of Government policy.

The Representor's response to Question 7 presents rationale for distribution of development and allocations based on the LPA following an evidenced-led approach to achieving sustainable development for rural communities. In doing so, such an exercise may provide a robust basis for a specific trigger in your designated rural areas in accordance with paragraph 63. Furthermore, an evidenced-led approach may determine the potential for specific housing allocations with a defined percentage and mix of housing, directly responding to local needs.

Q12: Should we allow market housing on rural affordable exception sites?

Yes.

Doing so would be consistent with paragraph 77 of the Framework that states “*Local planning authorities should support opportunities to bring forward rural exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help to facilitate this.*”

The response to Question 7 also highlights the demographic and housing challenges facing rural communities are not solely restricted to affordable housing, whereby exception schemes including some open market housing, such as at Over Wallop, deliver measurable sustainability benefits.

Q15: Should the Council change its approach and set out a requirement that certain sites should provide for the needs of such groups as the elderly?

The response to Question 7 highlights there may be circumstances where specific allocations, including at SHELAA site reference SHELAA64 at Barrow Hill, Goodworth Clatford, are required to respond to local circumstances and reflect local needs, which may include the needs of such groups as the elderly. Where evidence demonstrates housing allocations are required for villages to grow and thrive, the desirability of the specific size, type and tenure of housing needed for different groups in the community should be a primary consideration to deliver a sufficient supply of the right types of homes.

Q16: Should we include a policy that requires a mix and type of housing, or should the housing market inform what mix and type of housing to build?

The response to Question 7 highlights there may be circumstances where specific allocations, including at SHELAA site reference SHELAA64 at Barrow Hill, Goodworth Clatford, are required to respond to local circumstances and reflect local needs. Where evidence demonstrates housing allocations are required for villages to grow and thrive, the desirability of the specific size, type and tenure of housing needed for different groups in the community should be a primary consideration to deliver a sufficient supply of the right types of homes.

We look forward to reviewing the next Local Plan as part of future consultations.

We also look forward to working with you on behalf of our client in respect of demonstrating the sustainability benefits of the residential allocation of the land at Barrow Hill, consistent with the Framework’s objectives to promote such sites for housing development.

Yours faithfully,

FOWLER ARCHITECTURE AND PLANNING

cc: Clients