



The Planning Inspectorate

Report to Test Valley Borough Council

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an Inspector appointed by the Secretary of State for Communities and
Local Government

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PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)
SECTION 20

REPORT ON THE EXAMINATION INTO THE TEST VALLEY REVISED LOCAL PLAN

Document submitted for examination on 31 July 2014

Examination hearings held between 11 December 2014 and 21 January 2015

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Abbreviations used in this report

AMR	Annual Monitoring Report
AA	Appropriate Assessment
BMV	Best and Most Versatile agricultural land
CIL	Community Infrastructure Levy
DtC	Duty to Co-operate
d.p.a.	Dwellings per Annum
DPD	Development Plan Document
IDP	Infrastructure Delivery Plan
LDS	Local Development Scheme
LG	Local Gap
RLP	Revised Local Plan
MM	Main Modification
NP	Neighbourhood Plan
OAN	Objectively Assessed Need
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SANG	Suitable Alternative Natural Greenspace
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SINC	Site of Importance for Nature Conservation
SOCG	Statement of Common Ground
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
The Framework	National Planning Policy Framework
TA	Transport Assessment

Non-Technical Summary

This report concludes that the Revised Local Plan provides an appropriate basis for the planning of the Borough, providing a number of modifications are made. Test Valley Borough Council has specifically requested me to recommend any modifications necessary to enable the plan to be adopted.

All of the modifications to address this were proposed by the Council and I have recommended their inclusion after considering the representations from other parties on these issues.

The Main Modifications can be summarised as follows (details in Appendix):

- Clarification of the affordable housing need figure, and the provision of clarity regarding delivery
- Clarification of the role of Neighbourhood Plans in relation to rural housing policy and provision
- Amendments to settlement boundaries to reflect site boundaries and permissions
- Revised housing trajectory
- Emphasis on active community support for community led development
- Amendment to gypsy and traveller policy to clarify approach to local connections
- Clarification of the types of accommodation covered by the tourism policy
- Amendments to heritage policy to align with national policy and court judgements
- Clarification of the role of high quality design in areas of good townscape
- Strengthening of provisions in relation to monitoring/review of wind energy policy
- Emphasis on contingency actions if a shortfall in housing or employment delivery arises
- Amendments to ensure that policies are effective by providing necessary clarity
- Park Farm, Stoneham – clarification on the role of proposals within Eastleigh, and to reflect the importance of heritage assets
- University of Southampton Science Park and Land south of Benham Campus – clarification of the definition of ancillary facilities
- Whitenap employment site – reference to overall an overall masterplan in conjunction with housing site.
- Bargain Farm, Nursling – widen the potential role of the Park and Ride proposal
- Definition of the extent of Stockbridge local centre

Introduction

1. This report contains my assessment of the Test Valley Revised Local Plan (RLP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the Duty to Co-operate, in recognition that there is no scope to remedy any failure in this regard. It then considers whether the Plan is sound, has been positively prepared and whether it is compliant with the legal requirements. The National Planning Policy Framework (the Framework) makes clear that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the submitted draft plan July 2014.
3. My report deals with the Main Modifications that are needed to make the RLP sound and legally compliant, and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested¹ that I should make any modifications needed to rectify matters that make the Plan unsound/not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The MMs all relate to matters that were discussed at the Examination Hearings. Following these discussions, the Council prepared a schedule of proposed MMs and carried out a Sustainability Appraisal. The MMs and this SA have been subject to public consultation for six weeks from 24 April 2015. I have taken account of the consultation responses in coming to my conclusions in this report.
5. The MMs do not include changes proposed by the Council that I consider are not needed for soundness/legal compliance reasons and do not materially affect the Plan's policies. For the avoidance of doubt, the report makes no comment about the merits of any additional changes recommended by the Council that are not specifically mentioned.
6. Following the end of the Hearings, various documents were published, of which three are of particular note. A new Planning Policy for Traveller Sites (August 2015), a Written Ministerial Statement entitled 'Local planning' which set out new considerations to be applied to proposed wind energy development (June 2015), and the 2012-based Household Projections 2012-2037. I have considered these documents, and the responses from parties as appropriate, in my report.

Assessment of the Duty to Co-operate (DtC)

7. Section s20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on them by section 33A of the 2004 Act in relation to the Plan's preparation.
8. Test Valley is bounded by eight other local planning authorities. At an early stage it was decided that joint plans would be impractical due to the varying stages which the authorities had reached in plan preparation. In any event, the Council's

¹ 18 September 2014

position was that it could meet its strategic requirements within its boundaries, and had not received requests from neighbouring authorities to accommodate their needs.

9. However, a range of joint working arrangements have been in place for some years and have continued. The Council's Duty to Cooperate Statement' (EB/AD/8) sets out in detail how the authority worked with a number of organisations, including neighbouring authorities and statutory bodies. The Council has clearly participated in a range of joint projects and working groups with other local authorities and relevant organisations during the preparation of the RLP. In particular there are a range of formal partnerships including the Partnership for Urban South Hampshire (PUSH), which has published a statement highlighting how the constituent authorities have co-operated with each other on strategic issues. There are numerous examples of joint working to produce documents forming part of the RLP evidence base. Furthermore it is clear that other local authorities and relevant organisations have had full opportunity to engage with the Council at all key stages in the process of preparing the RLP and, particularly, that no other local authorities are looking to Test Valley to assist with their housing issues (clarified by **MM/5/2**).
10. On the first day of the Hearing a submission was made by a representor to the effect that the Council had failed in relation to the DtC. This was discussed in some detail at the Hearing, and in public correspondence between the representor, the Council and myself. The most important element of this submission was that the Council's identified affordable housing need figure is 292 dwellings per annum (d.p.a.) (clarified by **MM/5/1**), with certain caveats, whereas the expected provision is 206 d.p.a. The Council put forward reasons for this position, but the DtC issue relates to the fact that the Council had not asked neighbouring authorities whether they could accommodate some or all of the identified shortfall.
11. There is nothing to suggest the extent to which any shortfall in affordable housing provision within Test Valley would lead to displaced demand affecting some or all of the eight adjoining authorities.
12. The objective of the DtC is to maximise the effectiveness of the plan making process. In this case the overall manner in which the Council has worked with other authorities, particularly but not exclusively in the southern part of the Borough, is impressive. In the light of their considerable experience, Council officers presented me with a very clear picture of the position of adjoining authorities in relation to affordable housing. To have made a formal request to adjoining authorities for assistance with affordable housing, when the Council knew full well what the answer would be, would not have been effective or productive.
13. In subsequent correspondence the representor also stated that there would be a shortfall in market housing, and that the DtC would additionally be triggered in this respect. However, as I conclude (below) that the RLP will meet the full OAN for market housing, this matter does not trigger the DtC.
14. The Council has clearly taken into account the wider strategic context and the interrelationships with neighbouring areas, particularly in terms of housing markets and employment patterns. I am satisfied that the Council has engaged

constructively, actively and on an ongoing basis with relevant local authorities and organisations, and I conclude that the DtC has been met.

Assessment of Soundness

Main issues

15. Taking account of all the representations, written evidence and the discussions that took place at the Hearings I have identified the following main issues, based largely on my initial Matters and Issues, upon which the soundness of the RLP depends. For ease of comprehension I have considered them in this report in the order of the policies in the RLP, as I did at the Hearings. Where there is no section on a particular policy or allocation, this indicates that having read the representations and considered the Framework tests, there is nothing which needs reporting, and that nothing in those matters is potentially unsound.

Overall vision, objectives and delivery

16. The overall vision of the RLP refers to the opportunity for everyone to fulfil their potential and enjoy a good quality of life. At the highest level, this is a clear and appropriate vision, which is then fleshed out by a series of eight themes, reflecting the community plan and joint working projects, and which reflect the roles of sustainable development and the core planning principles in the Framework.
17. Overall the vision of the RLP is consistent with national guidance and is based on a sound and thorough analysis of the current situation in the Borough, as demonstrated in the comprehensive evidence base. The RLP provides locally suitable and appropriate objectives, including those in respect of sustainable development, in line with national policy.
18. There is a clear identification within the RLP of the strategic policies to which any future Neighbourhood Plans (NP) would need to conform. Although the evidence is clear that the Council has been proactive in encouraging communities to consider preparing NPs, the take up has been slow to date. Given this limited response rate, the Council's approach to not identify NPs as a vehicle for housing delivery is wise, although a more supportive general approach towards NPs is necessary **(MM/5/4)**.
19. The RLP is clear as to the delivery of new development and infrastructure. RLP Table 3 identifies the overall spatial strategy, including links to individual policies and a clear summary of the relevant elements of the Framework. Importantly, the RLP identifies actions which would be taken in the event of a failure to meet objectives – especially in the crucial areas of housing and employment (paras 5.100 – 5.102 and 6.47), along with a separate chapter on delivery and monitoring.

Delivering sustainable development and the Sustainability Appraisal (Policy SD1)

20. The presumption in favour of sustainable development is set out at policy SD1. This reflects the positive approach in national policy and is sound.

21. The Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment) (EB/AD3 and 4) was also assessed as part of the evidence base under this heading. The SA particularly focuses on the strategic scale and distribution of housing and employment, settlement boundaries, and some other major site allocations.
22. The SA has been through a number of rounds of consultation and refinement at different stages of the RLP process. It describes and evaluates the likely significant effects of implementing the plan. It has been positively reviewed by external agencies (most particularly by the Planning Advisory Service) – and these reviews have led to subsequent modifications. The audit trail showing consultation responses and the views of 'critical friends', along with the Council's considered responses, is clear. The SA has considered a range of alternative options, and overall the SA process which has been undertaken alongside the RLP has been thorough.
23. Inevitably, the SA is not a simple document. One criticism is that it is hard to follow, and there is an element of truth in this. The approach was carefully explained at the Hearings by the Council and in a Further Statement – in particular explaining the use of a series of symbols to summarise the performance of particular alternatives/sites. Although the SA is clear as to the way these symbols are to be used, they did cause some confusion as representors sought to sum them and draw conclusions as to the relative acceptability of certain options/sites from the result. It is clear however that this is not the way in which the symbols are intended to be used, and this is especially important in instances of options being considered without mitigation. As part of the process the Council's Infrastructure Delivery Plan (IDP) (EB/D&I1) clearly set out essential evidence which informed judgement on deliverability.
24. It is important that reasonable alternatives to the selected strategy and the reasons for rejecting them are set out clearly. Partly due to the apparent confusion as to the use of the symbols, not everyone agrees with the findings of the SA, particularly with regard to residential allocations. However the strategic options (i.e. 50+ dwellings) were carefully assessed in the SA, with accessibility of services, facilities and travel modes as key variables. This focus on strategic options is in line with national policy, which is that the supply of new homes can sometimes be best achieved through planning for larger scale development. In many cases, having considered the SA and the representations on particular omission sites, it seems that many of the disagreements come down to differences of planning judgement. I consider that there is a reasonable basis for the judgements the Council has made in the SA.
25. Overall, the economic role of sustainability is addressed by ensuring a supply of appropriate land to support future growth. The social role is addressed particularly by the housing targets for market and affordable dwellings intended, as realistically as possible, to provide a supply of housing to meet the needs of present and future generations. Importantly there is a clear recognition that employment and housing opportunities must be considered in parallel. The environmental role is addressed by a range of countryside and environmental policies. Taking all of the above matters together, the Plan has been subject to adequate SA and is sound in its approach to the elements of sustainable development.

Local communities (general) and housing provision 2011-2029 (Policy COM1)

Housing requirements

26. Policy COM1 sets out a housing requirement of 10,584 dwellings, equating to 588 d.p.a. This is stated to fully meet all household and population projections, based on a Strategic Housing Market Assessment (SHMA).
27. The evidence base largely comprises the SHMA (EB/LC14), the Strategic Housing Land Availability Assessment (SHLAA) (EB/AD15) and the SA (EB/AD3 and 4) which analysed each of the SHMA projections. 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.
28. The Council's position is that the housing requirement meets the objectively assessed housing need in full for market housing and, in so far as is realistic and deliverable, for affordable housing.
29. The SHMA identified a number of household groups with particular housing needs (Clarified by **MM/5/3**). The housing figures in the SHMA resulting from all the scenarios based on population and household projections range between 147 - 485 d.p.a. Two scenarios were recommended, which indicated a range of 420 - 450 d.p.a. The SHMA also looked at economic scenarios based on a jobs forecast, which indicated a range between 570 - 590 d.p.a.
30. The economic scenarios are soundly based on assumptions regarding the available labour supply of the working age population. It assumes that the level of net out-commuting remains constant in line with the increase in jobs and that the employment rate of the Borough's residents will increase from a 2011 baseline of c. 77% to 81% by 2031. I will consider each of these assumptions below.
31. Overall, the use of an economic scenario on which to base population targets is clearly supported by the evidence base, and is in line with the advice in Planning Practice Guidance (PPG) which is that forecast job numbers and the working age population should be taken into account. This lends credence to the economic scenario based on a jobs forecast in the Strategic Housing Market Assessment (EB/LC14). The jobs forecast used in the projections is based on a forecast produced by a nationally recognised company, and it is noteworthy that the same data was used for the South Hampshire SHMA. The forecast uses an unconstrained ('policy off') approach, and appropriately models the growth in the economy without taking account of constraints. This forecasting represents a robust approach. The use of an economic scenario reflects the Framework advice related to the importance of economic growth to sustainable development.
32. The background to the local employment rate has been clearly set out in the evidence base. An employment rate of over 80% was achieved in the area prior to the recession, and the Council's reasonable assumption is that this will increase to

81% in the light of the economic recovery and various national and local initiatives.

33. The overall approach towards commuting must be based on the need, set out in the Framework, to aim for a balance of land uses within an area. Journeys to work should be minimised. The Council's commuting assumption, based initially on the fact that the area has more residents of working age than there are jobs, is a common feature of areas such as Test Valley given its attractiveness and the relative proximity of substantial labour markets. Although it would be desirable to reduce or even eliminate net out-commuting, this is accepted to be an unrealistic aspiration. Equally, if housing completions were to outstrip the ability of the local economy to provide employment, the result would be an increase in out-commuting. The approach to commuting is realistic and justified.
34. Various other matters, many of which were contested by those making representations, were assessed by the Council. These included consideration of market signals, which led to a slight upward adjustment to the baseline demographic projection, historic completion rates and the potential suppression of household formation. This assessment resulted in a projection of 485 d.p.a., which allowed for potential household suppression by using 2008 headship rates in the post 2021 projection.
35. Taking the economic scenarios based on a jobs forecast, the SHMA indicates an OAN requirement in the range 570-590 d.p.a. Having considered the SHMA, the SHLAA and the SA, the RLP sets the housing figure at 588 d.p.a., which is within the range of the economic scenarios, and meets the OAN. This would fully meet household and population projections, allowing for migration and demographic change, and provide for economic growth.
36. The position in relation to affordable housing (addressed by policy COM7) is somewhat different, as has been discussed above in relation to the DtC. The Council's initial affordable housing target was set in the Corporate Plan 2011 – 2015, and later by the Housing Strategy. The target was set as 200 d.p.a. The SHMA quantified the objectively-assessed affordable housing need in the Borough, which equates to 5,261 dwellings over the plan period – which translates to 292 d.p.a. over the plan period, or 370 d.p.a. if the current backlog is met by 2018 (then reducing to 262 d.p.a.). The Council's position is that the affordable housing need should be met over the plan period, for a number of reasons.
37. The assumption in the evidence is that 35% of housing completions would be affordable – made up of the successful implementation of policy COM7, rural exception sites, community-led development and schemes undertaken directly by registered providers. This is a robust estimate based on what is sought by the policy and other sources as assessed in the Housing Topic Paper (EB/LC1). This explored the feasibility and deliverability of providing different levels of affordable housing provision, and the necessary increase in market housing which this would require. The past four years delivery of affordable housing has also been assessed. On that basis, 206 d.p.a. would achieve the Council's corporate target of 200 d.p.a., but would fail to meet the full OAN for affordable housing.
38. If the full affordable OAN were to be met, it is clear that viability constraints would preclude increasing the 35% (or similar) sought on individual market

developments. An increase in the total housing requirement figure would therefore be the only alternative - to 834 d.p.a. (Instead of the 588 d.p.a. otherwise supported by evidence). However there is no persuasive evidence of a level of market demand needed to support 834 d.p.a. (with 35% affordable housing equating to 542 d.p.a.) Even if there were, it is clear that the result would be a significantly increased level of out-commuting, as the local employment base would be unable to support the resulting increase in the working population.

39. Local plans should be aspirational, but also realistic. The amount of affordable housing delivered over the past four years clearly suggests that a figure of around 200 d.p.a. is achievable. The Council, for viability and sustainability reasons, is not able to meet the full affordable OAN, although the approach goes a long way towards that goal. An increased target would lead to the Plan becoming potentially undeliverable and unsound.
40. After the close of the Hearings, the 2012-based household projections were published and were the subject of consultation and comment. These new projections start from a base position some 10-14% below the SHMA figures. The advice in PPG is that, although local needs assessments should be informed by the latest available information, housing assessments are not rendered out of date by every new projection – what matters is whether the change is meaningful.
41. In this case the new projections show a lower level of need than that assessed in the SHMA – the new projections suggest a need around 10% lower than previously assessed. However the new projections are based on a different set of population estimates and use different headship rates. Supported by a sound evidence base, the RLP is looking to provide 588 d.p.a, which is above the level indicated in the new projections. But the approach of the RLP is not exclusively based on population data, as it also factors in employment issues, suppression in household formation and market signals. These matters can be reassessed during the RLP review, and do not necessitate any change to the RLP at present.
42. Overall, the Council has demonstrated a clear understanding of the housing needs in the area, as set out in the SHMA. The SHLAA has then made realistic assumptions about availability, suitability and the viability to meet this identified need for housing. The overall housing requirement is therefore credible and justified by robust evidence of local housing needs/demands and population changes. The evidence demonstrates that the RLP housing requirement will meet the full, objectively assessed needs for market housing and, although there would be a shortfall in affordable housing, this reasonably takes account of a range of local factors including the consequences for the overall sustainability of the approach.

Housing supply

43. The Framework requires that the Council should identify and annually update a supply of specific deliverable sites, sufficient to provide five years' worth of housing against requirements along with an additional buffer of 5% to ensure choice and competition in the market for land. A 20% buffer is not necessary, as the Council does not have a persistent record of low delivery. A supply of specific, developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15 should also be identified and annually updated.

44. The Council's methodology in calculating the five year supply is set out in the Housing Topic Paper (EB/LC1). The figures on future completions are comprehensively supported by the SHLAA (2014), which includes details on the stock of outstanding planning permissions and sites which do not yet have planning permission, but where there is a presumption in principle in favour of residential development and which are assessed as deliverable.
45. The Framework allows for a windfall allowance to be included in the supply. The Council's approach to windfalls is described in Section 14 of the Housing Topic Paper (EB/LC1), which sets out that the Borough has historically benefited from this windfall development, often by way of redevelopment within the settlement boundaries of the 2006 Local Plan or from reuse of buildings in the rural area. The windfall allowances in the RLP are based upon the average windfalls which were achieved over the 2006/07-2012/13 period. The evidence is that such sites have consistently become available in the Borough and should continue to provide a reliable source of supply.
46. Although there has not been persistent under delivery in housing supply in Test Valley which would warrant a 20% buffer, there has nonetheless been a shortfall in housing during the former South East Plan period. This shortfall is included in the five year housing land supply calculations in the Housing Topic Paper and elsewhere. The issue is whether the shortfall should be met within the first five years of the plan period (known as the 'Sedgefield method') or spread over the whole plan period (known as the 'Liverpool method').
47. The advice in PPG is that authorities should aim to deal with undersupply within the first five years of the plan period wherever possible. There is no doubt that the Council is committed to meeting its supply requirements and, in some parts of the Borough, sufficient developable sites can be brought forward within the first five years. However, due to the largely rural nature of the Borough and the reliance on a number of relatively large sites in the southern part of the area, it would not be realistic to achieve this on a Borough-wide basis at this time. The housing trajectory clearly shows the rate at which these larger sites will be developed and their importance to addressing the undersupply. The Sedgefield approach would be unrealistic on a Borough-wide basis, as it would be unrealistic for any shortfall in one part of the Borough to be accommodated in the other part of the area.
48. The overall intention of the RLP is to make up the overall shortfall as rapidly as possible with much of the development in the northern part of the area coming forward within five years, along with some elements of the supply in the southern part of the area. The contribution of some of the larger sites in the southern part would continue during the 10 year period to 2024/25. Overall a significant amount of the undersupply would be dealt with in the first five years, with the remainder in the next five years. This is closer to the Liverpool method, albeit that the delivery is not spread over the entire plan period. During the early part of the plan period the two separate HMAs would need to be used for the calculation of the housing land supply, although there is no reason why a Borough-wide approach should not be considered during the latter part of the plan period.

49. There is no point in producing a housing trajectory indicating unrealistic rates of development. Given the rural nature of the Borough and the importance of a limited number of larger sites, the approach of the RLP is a pragmatic and effective method of addressing the undersupply as soon as possible.
50. Overall, the way in which the housing requirement will be met by the different components of supply is set out in Tables 6 and Table 7 of the RLP. The RLP housing trajectory gives past and forecast future annual completions for each of the housing allocations throughout the plan period. The trajectory and phasing has been determined following consultation with developers and landowners, and has been revised on that basis during the Examination in the light of their changing positions (**MM/Annex D**). This trajectory will be monitored and reviewed annually.
51. The housing trajectory demonstrates the existence of a five year housing land supply and sufficient developable housing sites throughout the plan period to meet requirements and give a reasonable degree of flexibility and choice.

Settlement hierarchy (Policy COM2 and maps 1 – 43)

52. In an area such as Test Valley where there is significant pressure for (particularly) housing, it is necessary, in line with national policy, to establish a mechanism to guide development, in the interests of encouraging sustainable development and protecting the intrinsic character of the area. The approach of the RLP is to define a settlement hierarchy and, within each tier, to identify the type of development which may be acceptable. Subsequently boundaries for each settlement in the top three tiers of the hierarchy are defined.
53. Within settlement boundaries the principle of development and redevelopment will be permitted provided it is acceptable in terms of other RLP policies. Outside settlement boundaries, development will only be permitted in certain specified circumstances – to which I return below. With this background it is unsurprising that numerous representations have been made concerning the policy and the definition of the settlement boundaries.
54. The general approach is clearly set out in Topic Papers for COM2 (EB/LC2; EB/LC20) and is in line with Framework policy to focus development mainly in locations which are, or can be made, sustainable, and to recognise the character and roles of different areas. The use of a settlement hierarchy is an appropriate tool to identify the current role and function of settlements in relation to various sustainability factors. The approach identifies four categories in the hierarchy which, although admittedly based on a 'snapshot' of the current characteristics of the settlement, unsurprisingly reflects the overall pattern which has been established for some time, and which continues largely unchanged in the RLP. This reflects the essential character of the Borough, with two major centres at Andover and Romsey, beneath which are key service centres, rural villages, and the countryside, which does not appear to have fundamentally changed for many decades.
55. Some doubt was raised by representors regarding the classification of Romsey as a Major Centre, with the wide range of development which this categorisation brings about. Whilst the population of Romsey is slightly less than half that of Andover, it

is clearly the main settlement in the southern part of the Borough and the evidence base shows that it includes the majority of facilities and services which characterise a Major Centre, and its inclusion in that category is justified.

56. The precise definition of settlement boundaries is a matter of considerable concern to a number of representors, and the way in which these boundaries were defined is therefore of importance.
57. Following the definition of the settlement hierarchy, a review of the existing characteristics and form of the settlements was undertaken. This important stage was informed by a standard framework, making allowance for the diverse form of the settlements in the Borough. Following a series of discussions and workshops with interested parties, it was decided that a single boundary around settlements was the best approach – recognising that a few settlements were made up of separate small clusters. A list of uses was defined which were considered to form the basis of settlements, as opposed to the wider countryside. Whilst it could be argued that other elements could be included in the list, or existing elements removed, the list as defined by the Council is a sound approach towards the definition of settlements.
58. Despite this structured approach towards settlement boundary definition, there is an inevitable necessity for the exercise of judgement on the ground. This has been identified as an issue by a number of objectors, and was accepted by the Council. Having carefully considered each of the settlement boundaries, I consider the judgements made by the authority to be reasonable, and the definition of the settlement boundaries to be sound. This is subject to three modifications to address specific locations to more accurately reflect site boundaries and the extent of the settlement (**MM/MAP5, MM/MAP8A, MM/MAP29**).
59. In coming to this view, I have considered the merits of the alternative boundaries and sites put forward by representors, including a number of sites which are described as 'rounding off' settlements, but I do not consider them preferable to the boundaries and sites proposed in the RLP. Some of the excluded areas perform an important function in separating settlements. I find that the suggestion that development should be allowed within 'or adjoining settlements' would lead to uncertainty being built into the plan. I can appreciate representors' concerns that some sites were included at earlier iterations of the plan, and subsequently excluded. Inevitably, with the passage of time, some sites within or outside settlement boundaries have received planning permission, but it would be unrealistic to adjust the settlement boundaries in relation to specific decisions – this can be considered in a future review of the RLP. Overall I find the process which the Council has undertaken to be sound.
60. It has been suggested that the approach of the RLP disadvantages rural areas. However, bearing in mind the lack of facilities and employment opportunities in the countryside, development in such areas would be likely to increase out commuting for employment and to access other facilities, and would not accord with the principles of sustainable development. In any event, the approach of the RLP towards settlement boundaries does not represent a complete ban on development outside the designated areas, and this is important in relation to the argument that greater flexibility should be allowed. Against the general background of restraint, the RLP allows for exceptions in the form of community led development (Policy

COM9), rural exception schemes (Policy COM8), the reuse of rural buildings (Policy LE16), accommodation for rural workers (Policy COM10) and through the Neighbourhood Plan process. The approach towards Neighbourhood Plans needs to be clarified in relation to this policy (**MM/5/4**).

61. I accept the need to locate housing where it would enhance or maintain the vitality of rural communities. The RLP seeks to address this by allowing a limited scale of development in Rural Villages, where there is some degree of service provision. I understand the argument that, by allowing development in currently unsustainable locations which lack services, this could act as an incentive towards the provision of facilities. However this argument is not supported by evidence and, even were it to work in practice, it seems reasonable to assume that a considerable amount of development would be required to 'pump prime' any increase in facilities.
62. On the other side of the coin, the RLP approach towards the definition of settlement boundaries, whilst identifying some limited development opportunities in rural areas, also allows for a range of policies aimed at protecting the character and appearance of the countryside.
63. Overall, the RLP approach towards settlement boundaries is soundly based, as demonstrated by a range of supporting evidence.

New Neighbourhood at Whitenap, Romsey (Policy COM3 and Map A)

64. Policy COM3 proposes a substantial development of around 1,300 dwellings and a range of other facilities adjacent to the edge of Romsey. It would be complemented by around 6 hectares of employment development allocated by Policy LE3 (discussed below). There have been particular concerns as to the extent to which the development would complement and benefit the town or act as a dormitory for other parts of the wider area (given its good road access).
65. The Settlement Hierarchy Topic Papers (EB/LC2; EB/LC20) identified criteria which assessed the suitability of various settlements. The Whitenap site is adjacent to the defined major centre at Romsey, which includes a range of transport, educational, employment and retail facilities. It is therefore unsurprising that the area adjacent to Romsey is identified as having scope for sustainable development – but it is important that the links to the settlement are feasible and attractive.
66. The selection of this site, along with others, was assessed in the SA against a number of criteria. This site was identified in the SHLAA, which also noted the potential for early delivery. The SA recognises that some other locations (particularly land at Ganger Farm and Halterworth) are broadly similar. However preference has reasonably been given to Whitenap in view of its proximity to Romsey, and as the site does not adversely affect the distinction between settlements (as at Halterworth) nor identified for other uses (as at Ganger Farm).
67. I am mindful that national policy provides that the supply of new homes can sometimes be best achieved by larger developments such as extensions to existing settlements. In this case a Statement of Common Ground (SOCG) has been agreed between the landowner and the Council, which confirms the intention to provide a primary school, retail and community facilities. This would be a benefit to existing and future residents.

68. The site proposes a significant proportion (37%) of the housing proposed in the southern part of the Borough over the plan period. It is therefore important that there are no identified obstacles to delivery, as a failure to deliver could have significant consequences.
69. The revised housing trajectory (**MM/Annex D**) shows commencement of the housing development in 2019/20 – which is later than originally envisaged. However this is not of significance as the current trajectory shows an increased, and reasonable, number of units provided each year – so overall delivery would not be affected.
70. The entire site is in single ownership and a partnership has been formed with three housebuilders to progress an overall masterplan. It is available for development now. There are no impediments to delivery identified in the Infrastructure Delivery Plan (IDP), and although infrastructure has to be put into place, this is common to most developments. In addition, the existence of monitoring arrangements and contingency responses in the RLP, along with the progress which has been made to date, gives a reasonable degree of reassurance that the dependence on such large sites will not jeopardise the overall approach.
71. Turning to the sustainability of the proposed allocation, the site is at the southern edge of Romsey and the main vehicle access would be onto the A27 (adjacent to the employment allocation), which gives easy access to a range of other settlements including Southampton. Whilst convenient, this might not encourage integration with Romsey. However the facilities available in Southampton are of a different order to those in Romsey and, although it would be around 2 miles to Romsey by car, this is not likely to deter those wishing to use this attractive market town for lower order trips.
72. In addition, there are potential pedestrian and cycle links from the north of the site towards Romsey, which would encourage sustainable means of transport. The timing of these links would form part of the masterplanning process, but the current indication is that they would come forward at an early stage. As I saw, these potential routes have some inherent disadvantages, but the Romsey Town Access Plan (2015) identifies these issues and proposes measures to overcome them. The RLP needs to directly address these deficiencies and require a Transport Assessment (TA) (**MM/5/6**). The RLP should also incorporate the need for the local centre and sustainable travel facilities to be brought forward early in the development (**MM/5/5**). The masterplanning process is a reasonable approach to the development of such a large area, and it is therefore accepted that the RLP policy is not too prescriptive at present.
73. There is no requirement within COM3 for a bus route to serve the site, and the policy does not require the enhancement of public transport. However the Council and the potential developers are committed to the masterplanning process, and the provision of improved facilities can be considered by that process.
74. The overall Whitenap site is identified for a significant employment development as well as housing. Although the extent of the linkage cannot realistically be quantified, it is reasonable to assume that some residents of the new housing would work at the employment site, which would be a sustainable approach.

75. Some other alternatives put forward for the site by those concerned at the scale of the development, would have the effect of reducing the size of the development at Whitenap and tend to shift its focus southwards (away from existing residents). This would enable the formation of a new park featuring historic views. However there is no persuasive evidence to justify the reduction in the scale of the development in this manner and, in any event, this approach would tend to isolate the new development from Romsey.
76. There is concern as to the quality of the agricultural land which would be lost, although the evidence is that the majority of the land is Grade 3b and therefore outside the Best and Most Versatile Land (BMV) classification. In any event, most areas which would be needed to meet the pressing housing needs of the area would result in the loss of agricultural land, and this is insufficient to reject the allocation.
77. Beggarspath Wood and Luzborough Plantation are in the same ownership as the housing and employment land, and would provide an important recreational and ecological element of the allocation. To a degree, there may be a conflict between these two functions. The wood and parts of the plantation are Sites of Importance for Nature Conservation (SINC), and careful management would be required to enable them to be incorporated as Suitable Alternative Natural Greenspace (SANG) to enable public access for recreation.
78. However the SOCG sets out the intention to reconcile these issues by way of the masterplanning process. Work has already commenced on these aspects and no significant obstacles are seen to these discussions resulting in the provision and enhancement of this important facility. Substantial areas of agreement have been achieved with a number of parties.
79. Overall, the allocation is appropriate and justified by the available evidence.

New Neighbourhood at Hoe Lane, North Baddesley (Policy COM4 and Map B)

80. The proposal is for a new neighbourhood of around 300 dwellings and open space on the western edge of North Baddesley.
81. The selection of the site, beginning with the SHLAA and then consideration in the SA, is similar to that at Whitenap, and I find the general process sound. In this case the site is adjacent to North Baddesley, which is identified as a Key Service Centre and includes an appropriate range of facilities including a primary school. Given this background, strategic allocations would be reasonable in this immediate area.
82. As with Whitenap, the allocation would represent a significant proportion (around 9%) of the housing proposed in the southern part of the Borough. However there are no identified obstacles to delivery which could not be overcome. Indeed, although the original trajectory showed commencement in 2020/21, the SOCG brings it forward in the revised trajectory (**MM/Annex D**). This would have the benefit of bringing housing development forward in response to changed circumstances.

83. It should be noted that the site is in the same ownership as Whitenap and this does raise the additional issue of the amount of the local housing provision being in the hands of one landowner/developer. For whatever reason, if a single landowner/developer chooses not to go ahead with the site(s), this would have a significant consequence for delivery overall. However there is every indication that there is a willing landowner and developer and, especially given the contingency arrangements built into the RLP, this is not a matter to affect soundness.
84. Turning to the accessibility and sustainability credentials of the proposed allocation, the main vehicular access is shown as being from the south of the site (subject to some upgrading) as this has been shown to be the most direct access with sufficient capacity, whilst largely avoiding existing residential areas to the east. From this access point the development would be about 3 miles from Romsey and around 7 miles to Southampton. As before the range of facilities differs considerably as between Romsey and Southampton and the proposed allocation is well located for either. In addition, the facilities at North Baddesley itself are under a mile away and are accessible on foot or by bicycle as well as by car.
85. There is a direct bus service about 400 metres from the site – accessed by footpaths. Given the comparatively limited scale of the development, it is accepted that a dedicated bus service through the site does not need to be referenced in the RLP, although this would not be precluded if the detailed masterplanning process showed it to be necessary and feasible. There is reasonable access to the local cycle path network. There is an intention that a pedestrian/cycle link would be provided to the east of the site as part of the masterplanning process.
86. Turning to the effect on existing residents to the east, whilst the main access would be to the south, there is also provision for a secondary access through the residential areas to the east. Not unexpectedly, this has caused some concern in those areas. However, as part of the detailed masterplanning process, the split between the two access points can be controlled by the layout of the development, and there is no reason to anticipate unacceptable impacts on existing residents.
87. As with the Whitenap proposed allocation, Beggarspath Wood and Luzborough Plantation would be a recreational/ecological resource. Access and management of this resource would be controlled through the masterplanning process.
88. Overall, the allocation is appropriate and justified by the available evidence.

Residential Development at Park Farm, Stoneham (Policy COM5 and Map C)

89. Land at Park Farm is proposed to be allocated for around 50 dwellings (the landowner considers a higher figure to be more appropriate), in conjunction with an intended allocation in Eastleigh Borough Council's Local Plan – this element would comprise around 1,100 dwellings.
90. The suitability of the site has been assessed through the SA process, and is justified. However the RLP makes it clear that the sustainability credentials of the site rely on the proposed infrastructure (including a primary school and a local

centre) within the Eastleigh part of the overall development. The proposed development within Test Valley would not, in itself, require the provision of new local facilities. In view of the manner in which the development is being progressed by both authorities, and the dependence of the Test Valley part on the larger element within Eastleigh, it is important that the policy and justification reflect that reliance (**MM/5/7 and MM/5/9**).

91. The housing trajectory indicates this site not coming forward until 2026, whereas the promoters of the site envisage a start date of 2018, and this is reflected in the Trajectory (**MM/Annex D**). Although significant discussions have taken place between the promoters of the site and the two local planning authorities, this may be optimistic on the basis of the evidence of progress to date.
92. In view of the manner in which the RLP allocation relies on the Eastleigh element, it is necessary to consider the position if, for any reason, the Eastleigh allocation did not proceed. There would then need to be further consideration of the RLP allocation. This would include new vehicle access and pedestrian/cycle links (currently proposed through the Eastleigh area) and the overall sustainability credentials of the site would need to be reassessed (although the promoter has stated that the Test Valley area could go ahead independently).
93. If the Park Farm allocation were not delivered, bearing in mind the limited size of the allocation, this would not affect the overall soundness of the plan. There would remain sufficient time for the allocation, and potential alternatives, to be reviewed.
94. There are heritage assets on the site and close to it. It is clear that these are fully appreciated by those promoting the allocation and, when a scheme comes forward, this would be considered in the light of RLP policy E9. However it is important that the allocation reflects the sensitivity and importance of the assets (**MM/5/8**).
95. Overall, the allocation is appropriate and justified by the available evidence.

New Neighbourhood at Picket Piece, Andover (Policy COM6 and Map D)

96. Picket Piece is east of Andover and includes a range of existing land uses. The central area has planning permission for 530 dwellings, to which would be added 400 additional dwellings and associated facilities.
97. Work has started to implement the existing permissions, and the majority of the land south of Walworth Road is under the control of housebuilders. The additional area came forward through the SHLAA and was assessed in the SA. The promoters consider that delivery can be achieved rapidly, although the housing trajectory takes a rather more cautious approach in view of the scale of the overall development. There remain some areas of land assembly to be undertaken, and this approach is therefore reasonable.
98. Facilities to serve the overall development have already been approved as part of the 530 house planning permission, including a local centre, together with contributions towards sports facilities. If any further facilities were required, allowing for the overlap with those being provided under the current permission, it would be reasonable to address the position under other RLP policies. It is

accepted that there is no additional need for the inclusion of this element in the policy itself.

99. There is an apparent anomaly in that the settlement boundary under COM2 and the proposed allocation site (COM6 and Map D) are not the same. Some parts of the proposed allocation lie outside the proposed settlement boundary. Whilst it is recognised that the general approach towards defining settlement boundaries benefits from consistency across the Borough, it is unusual in circumstances where the RLP positively allocates significant development beyond the boundary. However the settlement boundary could be revised once the development takes place. This matter is a long way from leading to a finding of unsoundness and could be considered at an early review of the plan.
100. An element of the proposed allocation lies within Flood Zone 2. This was recognised in the SA, which noted that development could come forward in such a manner as to minimise risk by the location of the built development away from the flood zone. The Environment Agency has stated that they have no objection to the allocation.
101. Overall, the allocation is appropriate and justified by the available evidence.

New Neighbourhood at Picket Twenty, Andover (Policy COM6A and Map D1)

102. Picket Twenty is a proposed allocation of around 300 dwellings and related facilities, envisaged as an extension to a new neighbourhood which is currently being developed to the west of the site.
103. The allocation was promoted through the SHLAA and assessed in the SA as an available site. It is being promoted by the developer of the scheme to the west, and there are no known constraints to development. The delivery in the housing trajectory – from 2018-2022 – is based on the completion rates achieved at the adjoining site.
104. The size of the allocation was based on representations made to the SHLAA process, but the promoters of the site are now suggesting, with substantial evidence, that this be significantly increased to around 500 dwellings. However it is not considered that this increase needs to be reflected in the RLP at this time in the absence of sufficient evidence – any application for a larger development could be considered on its merits.
105. A range of community facilities have been provided as part of the development to the west, including a primary school, a community hall and sports provision. There are also transport improvements. These facilities would obviously be available to residents of the proposed allocation, and there is no evidence of any need for the allocation to specify any detail regarding further facilities at this stage – the promoters accept that contributions will be needed towards local infrastructure and community facilities. The policy as drafted identifies the potential need, but leaves reasonable flexibility.
106. Part of the reasoned justification for the policy provides that the layout of any scheme on the site should not preclude development on specified adjacent land. Given that comment, it is reasonable to wonder why that land was not included in

the housing allocation. The Council's position is that the approach of the RLP is to only allocate land which is being specifically promoted for development. In order to give a reasonable assurance that allocations in the RLP will be delivered. This is a reasonable approach and it is also reasonable to seek to ensure that development of allocated sites will not sterilise adjoining land which may come forward in the future.

107. Overall, the allocation is appropriate and justified by the available evidence.

Affordable housing (Policy COM7)

108. Policy COM7 relates to the provision of affordable housing on private market housing sites of various sizes. The percentage of affordable housing which will be sought ranges from 40% on larger sites, to 20% on sites for 5-9 dwellings. In the case of developments of 1-4 dwellings, a financial contribution of up to the equivalent of 10% will be negotiated.

109. The evidence base, in particular the SHMA, has robustly quantified the extent of need for housing by those who cannot access housing without subsidy and the extent to which this need can be met by affordable housing forming part of market housing developments. The Housing Topic paper has explored the feasibility and deliverability of providing different levels of affordable housing, and the necessary increase in market housing which this would require. This has been considered above in relation to policy COM1.

110. The approach in COM7 is that a stepped approach would be used to seek affordable housing, with larger developments being expected to provide a greater percentage of affordable units. This is soundly based on the Affordable Housing Development Viability Update 2012 (EB/LCS). For the smallest developments, an off-site contribution would be sought for clear viability, practicality and management reasons.

111. The evidence is that these targets, which would be the subject of negotiation and are not absolutes, would be achieved by the majority of developments in normal market conditions. But in any event the policy and the explanatory text does allow for flexibility to take account of exceptional circumstances – either on particular sites or in the market generally. The thresholds and percentages for affordable housing are justified by up-to-date robust local evidence of housing needs, and provide sufficient flexibility if viability is an issue for a particular scheme.

112. The policy as submitted for examination provides that the Council would take account of the need to achieve a successful housing development, when assessing the suitability of sites for an element of affordable housing. This is unclear and needs to be modified to better explain the objective (**MM/5/10**).

113. In addition, rather than refer to a Supplementary Planning Document (SPD) to detail the mechanism by which the affordable housing will be ensured, the policy needs to be more specific by referring to the use of legal agreements (**MM/5/10**).

114. With this modification, the policy is appropriate and justified by the available evidence.

Rural exception affordable housing (Policy COM8)

115. Policy COM8 provides the mechanism to deliver rural affordable housing as an exception to countryside restraint policies. The policy clearly sets out circumstances when this exception might apply, and the details of implementation are set out in the Affordable Housing SPD (which is intended to be reviewed).

116. The general approach of the policy is in line with the Framework, which advises that Councils should be responsive to local circumstances, and utilise rural exception sites where appropriate. The policy and supporting text is in line with the Framework definition of Rural Exception Sites.

117. The definition of what constitutes 'local' need is not defined in national policy. The Council has used parishes as the area for considering rural housing need, and this is reasonable given the democratic credentials of parishes and their easy recognition by many residents. This approach does not preclude a group of parishes working together on housing need.

118. The policy is appropriate and justified by the available evidence.

Community led development (Policy COM9)

119. The purpose of the policy is to enable community led residential schemes to come forward. It deals with open market affordable proposals and accordingly differs from the approach of policies COM7 and COM8.

120. In one sense it echoes the provisions of the Localism Act 2011, but it would apply regardless of whether a NP was in place. An important principle of the approach is that the local community should have been involved in the preparation of the proposal. However for the avoidance of doubt the policy needs to go further and clarify that it requires active community support for the scheme. **(MM/5/11)**.

121. With this modification, the policy is appropriate and justified by the available evidence.

Occupational accommodation for rural workers in the countryside (Policy COM10)

122. In a broadly rural area such as Test Valley, a policy is necessary to address proposals for rural workers' dwellings. This is in line with national policy which recognises the essential need for rural workers to live at or near their place of work. However 'essential need' is not defined nationally, and COM10 seeks to provide this definition in a local context.

123. The policy approaches the matter using the functional and financial tests which were part of national policy before the introduction of the Framework. Although these are no longer part of national policy, there is no objection to the use of this type of test at a local level, and the Council has persuasively explained why they should be used. The approach is also in line with model conditions retained from Circular 11/95 (now on the Planning Portal).

124. The policy is appropriate and justified by the available evidence.

Existing dwellings and ancillary domestic buildings in the countryside (Policy COM11)

125. The RLP recognises that there will be instances where extensions to and ancillary uses of rural buildings will be acceptable. Policy COM11 seeks to control such developments. Although any extension would, by definition, increase the bulk of the building, the policy reasonably adopts a criterion related to visual intrusion rather than bulk.

126. The policy is appropriate and justified by the available evidence.

Replacement dwellings in the countryside (Policy COM12)

127. Policy COM12 provides the necessary controls over the scale of the replacement of permanent dwellings in the countryside. In particular it addresses the intrusiveness of proposals. A guide, rather than a threshold, of a volumetric increase of no more than 50% is suggested. This is included in the supporting text, and it could be argued that this would be better located in the policy itself. However, as the Council explained, it is intended as a guide rather than a fixed threshold, and this is accepted.

128. The policy is appropriate and justified by the available evidence.

Gypsies, Travellers and Travelling Showpeople (Policy COM13)

129. The background to this policy was set out in the Council's Gypsies, Travellers and Travelling Showpeople topic paper (EB/LC23). Policy COM13 is a criteria based policy (informed by Planning Policy for Traveller Sites² (PPTS)), intended to be supplemented by a separate DPD. The level of need, at the time of the submission of the RLP, is set out in the explanatory text, and the intention is that the need would be addressed by way of the DPD.

130. I was concerned that by deferring detailed site considerations to a subsequent DPD, little progress would realistically be made. However, in line with the Local Development Scheme 2014-2016 (LDS), the authority has moved significantly forward.

131. In January 2015 the Council agreed the draft Gypsy and Traveller DPD for publication under Regulation 18, along with a Sustainability Appraisal and Habitats Regulations Assessment. The consultation period has now finished. The consultation draft included three site-specific proposals, two of which are intended to be provided by 2017 and the third during the plan period. The progress on considering site allocations justifies the approach taken in policy COM13.

132. Part of the explanatory text to the submitted policy referred to a limitation to those with local connections. However PPTS advises that applications should be determined from any travellers and not just those with local connections. The proposed modification (**MM/5/12**) is necessary to make this clear.

² The RLP was based on the earlier version and it is recommended that the RLP be updated accordingly

133. Subject to this modification, the policy is appropriate and justified by the available evidence.

Local economy – general

134. The overall scope of the various employment policies, covering existing employment sites, retail matters, tourism, the reuse of rural sites and new employment sites is sound. Some sites are identified for specific uses, either based on identified requirements or related to site-specific factors, whilst others have more general allocations.

135. Representors have expressed concern that the approach and overall level of employment allocations is not sufficiently 'pro-growth', and is therefore out of step with Framework policies. However the evidence base related to employment growth is varied and robust, and provides a sound base for the proposed level of allocations. In particular the Test Valley Long Term Economic strategy (2007, updated 2009 and 2012) (EB/LE5, LE6 and LE7) has addressed the current economy of the Borough and forecasts, including the effect of potential policies. The general approach is in line with Framework policies to support sustainable economic development needs.

136. A number of the employment allocations were also identified, in various forms, in the Borough Local Plan 2006 (University of Southampton Science Park, Adanac, Nursling Estate, the extension to the Walworth Business Park, and the Andover Airfield Business Park). I needed to understand why these proposed allocations are now likely to go ahead, when they had not done so since 2006 (and before in some cases). I will deal with individual sites below as appropriate, but I note that some of these could be characterised as safeguarding and restriction rather than allocations at that time.

University of Southampton Science Park (Policy LE1 and Map E)

137. The Science Park is a renowned development in a campus setting. Although most of the site is developed, I accept the Council's argument that it is appropriate to have a specific policy to control any future development. It is noteworthy that the operators of the Science Park accept this approach. There are also two legal agreements which control uses on the Science Park (which are intended to be amalgamated into one).

138. Policy LE1 and the supporting text at paragraph 6.17 refers to the acceptability of support and ancillary facilities, whilst retaining the primary R & D focus of the development. However, as drafted, there is a lack of clarity on this matter which needs to be addressed. The Science Park has also put forward suggestions. This would be resolved by amendments to the explanatory text (**MM/6/1**). With this modification, the policy is appropriate and justified by the available evidence.

South of Benham Campus, University of Southampton Science Park (Policy LE2 and Map E)

139. The land is proposed to be allocated to allow for the expansion of the Science Park. There is no concern related to the soundness of the allocation.

140. The only issue is similar to that discussed above in relation to the main Science Park, and the need for clarity related to appropriate support facilities. The Science Park has made representations seeking flexibility whilst retaining the overall purpose of the allocation. As above, this needs to be clarified by modifications to the explanatory text (**MM/6/2**). With this modification, the policy is appropriate and justified by the available evidence.

Land at Whitenap, Romsey (Policy LE3 and Map A)

141. The proposed new neighbourhood at Whitenap (considered above at COM 3) includes a substantial area (around 6 hectares) of land allocated for employment. It would be located at the southern end of the area, although elements of employment use could be located within the main residential zone, subject to the masterplanning process. This would provide the potential for living and working in close proximity – either for residents of the new housing development or for existing residents of Romsey.

142. The allocation proposes both Class B1 and B2 development. This is supported by the evidence base, especially in relation to PUSH material. There has been concern that any office element could result in an oversupply of offices in the wider area and compete with sites in Southampton. However the Council has convincingly addressed this matter in the evidence base – especially the report responding to the comments from Southampton City (EB/LE30), supported by the Romsey Town Centre Office Market Update (2012) (EB/LE10). The persuasive conclusion of this work is that the office market in Romsey is different in style and nature from that in Southampton, and that there would not be a significant element of competition or oversupply.

143. The proposed employment allocation is not designed to be a freestanding element separate from the housing allocation. Indeed, without the housing element, the employment site would be isolated and potentially unsound. To address this point, as accepted by the Council, a modification is necessary to include reference to the masterplan (referred to in the supporting text to policy COM3) so as to ensure that the proposals at Whitenap come forward in a comprehensive way (**MM/6/3**). With this modification, the policy is appropriate and justified by the available evidence.

Land south of Brownhill Way, Nursling (Policy LE4 and Map F)

144. The area around Nursling is directly adjacent to the M27 and is an important area for employment uses, largely due to the good access to the highway network. There are a number of proposed individual allocations and policies.

145. The land south of Brownhill Way (including land within Southampton City) has planning permission for warehouse use which, at the time of the Hearings, seemed likely to be progressed. It was understood to be owned by the developer/occupier and seemed likely to be delivered. However, until such time as the development is completed and occupied, it is reasonable to continue the identification of the site for B8 floorspace to reflect the particularly good highway access and the evidence of the need for this use in this part of the Borough.

146. It has been suggested that the policy should be deleted and the site included within the settlement boundary, however the approach adopted by the Council – that is leaving the site outside the settlement boundary but bringing forward the allocation – is at least equally sound. However the policy as submitted failed to reflect the permission and the initial work on site. Modifications are necessary to reflect the extant permission and provide clarity (**MM/6/4 and MM/6/5**). With these modifications, the policy is appropriate and justified by the available evidence.

Land at Bargain Farm, Nursling (Policy LE5 and Map F)

147. The proposed Bargain Farm allocation for employment uses forms part of the strategic requirement for South Hampshire, and is justified by the evidence base. (Part of the land is allocated as a park-and-ride, considered below at policy T3). A proposal for the land (albeit with a slightly different site boundary) has been submitted and resolved to be approved by the Council.

148. The only issue with the allocation in the RLP relates to the fact that Bargain House Farm is a Grade II Listed Building (and a nearby barn is a non-designated heritage asset). The policy requires slight rewording to reflect the statutory duty in S66 of the Listed Building and Conservation Areas Act 1990 – this will be done by way of an additional modification and the policy is appropriate and justified by the available evidence.

Land at Adanac Park, Nursling (Policy LE6 and Map F)

149. Adanac Park is in a very prominent position adjacent to the M271 when approaching Southampton, and the evidence base supports the Council's view that it is of importance to the economy of the wider area. The whole site has outline planning permission for five plots, granted in 2008. One plot has been developed. The purpose of the policy is to ensure that there is control over future B1 office/research/manufacturing development (with support facilities).

150. There has been concern that the range of employment uses supported by the policy should be widened to encompass other B Class uses. However, in the light of the demonstrable need for this type of development in the area, it is reasonable to specify a slightly narrower range of uses.

151. The policy as drafted includes some imprecise and confusing elements. Although their intent – to secure particular types of high quality development – is clear, policy as drafted was in part too vague. This is addressed by a modification (**MM/6/6**) and, with this modification, the policy is appropriate and justified by the available evidence.

Extension to Walworth Business Park (Policy LE8 and Map D)

152. The Walworth Business Park is the largest employment estate in Andover, and dates from the 1960s and 1970s. It is accepted that it suffers from a number of problems related to its age, and that it is in need of rejuvenation. Around 11 hectares of land east of the existing Walworth Business Park is proposed for employment use under policy LE8.

153. Some concern has been expressed that, whilst acknowledging the need for improvement to the existing estate, there is no need for an extension. However, even leaving aside the evidence of the need for modern commercial premises, the extension would allow for the selective relocation and redevelopment of the original estate. The evidence indicates that the Council (as owners of the land south of Walworth Road) is actively working with a private sector partner. This allocation is appropriate and justified by the available evidence.

Andover Airfield Business Park (Policy LE9 and Map F1)

154. The Business Park is a strategic employment site and is the largest new site in Andover. The allocation is soundly based in principle.

155. The site has outline employment permissions for the entire site, and other permissions for some of the individual plots. Although some development has taken place, other areas remain undeveloped. The only question therefore is, with this background, whether the restrictions within the policy are justified. However, given the importance of the site and the fact that it is only partially developed, it is reasonable to maintain the allocation and the other provisions of the policy to guide development.

Contingency – employment (Paragraph 6.47)

156. The RLP recognises that employment needs and site availability will change over time, and it is accepted that there is a need for a clear set of actions which the Council will take if there is a lack of deliverable sites or an increased demand. This is a sound approach.

157. The Council is a significant landowner and the proposed modification would add specificity to the approach which would be taken under these circumstances (**MM/6/7**). This is necessary and justified.

Retention of employment land and strategic employment sites (Policy LE10 and Annex E)

158. Employment sites of varying types are an important component of the sustainable development approach set out in the RLP. The importance of retaining sites is especially set out in the Employment Land Review (2008, updated 2012). (EB/LE18, EB/LE20). A policy addressing potential changes of use is justified. This should reasonably apply to existing employment sites, allocated sites and sites with planning permission.

159. The Framework advises on regular review of employment allocations and to the relevance of market signals. Although the policy does not specifically refer to viability, there is a criterion dealing with the economic needs of the area which would allow for the sort of flexibility encouraged by the Framework. The regular monitoring of the policy can be achieved through the AMR. Overall, the policy is soundly based and is not unduly restrictive, as it sets out relevant and reasonable criteria.

160. There was a notable typographical error in the RLP in that paragraph 6.92 was in the wrong location. This clearly needs to be relocated and amended into this

policy but is sufficiently significant that it required public consultation as part of the MM process (**MM/6/8**).

Main town centre uses (Policy LE11 and Maps 44/45)

161. Andover and Romsey are identified as locations where existing town centre uses should be retained and other main town centre uses are encouraged to locate. Stockbridge is identified as a local centre, mainly in view of its large rural catchment area.
162. Policy LE11 deals with Andover and Romsey, and is permissive of town centre uses within defined boundaries. It also addresses the sequential test for new town centre uses.
163. I was concerned whether the RLP should indicate appropriate floorspace levels for the scale of new retail development in the two centres over the plan period. The potential for additional floorspace within the two town centres was assessed in the Test Valley Retail Update (2012) (EB/LE11). With this evidence base, the Council has aspirations to improve the retail offer in Andover, and to address the low convenience retention rate in Romsey. However I note that George Yard/Black Swan Yard (discussed below) has been identified as the best location in Andover and that there are no sites of an appropriate size in Romsey. On this basis, I agree that identifying precise floorspace would not be appropriate.
164. The Framework states that when assessing applications for retail, leisure and office development outside town centres, which are not in accordance with an up-to-date Local Plan, Councils should require an impact assessment if the development is over a proportionate, locally set floorspace threshold. If there is no local threshold the national default is 2,500 sq. m. Policy LE11 sets a much lower threshold – 1,000 sq.m. in Andover and Romsey, and 500 sq.m. elsewhere. The Framework allows for the establishment of such local thresholds and, based particularly on the Test Valley Retail Update (2012), I agree that the size of the Test Valley centres and the presence of much larger centres elsewhere justifies the proposed thresholds. Similarly the locally set threshold for a sequential assessment (280 s.m.) for main town centre uses and extensions outside Andover and Romsey town centre is justified.
165. I note that the policy does not address the evening/night time economy or tourism in town centres. However I accept that these are not major issues in the Test Valley context and that they are addressed by the Council's economic development role and policy LE18 (Tourism). Overall, policy LE11 is appropriate and justified by the available evidence.

Ground floor uses in Romsey (Policy LE12 and Map 47)

166. Romsey town centre serves immediate residents and those in the hinterland, and offers a different shopping experience to the larger facilities available in the wider area. The Council has identified primary and secondary shopping frontages in the main shopping area. Policy LE12 seeks to retain 35% in Class A1 retail use, with a wider range of uses available in secondary frontages. This is a conventional and justifiable general approach.

167. The RLP meets Framework policy in that it defines the extent of the town centre, and provides a wider range of acceptable uses in secondary frontages. My concern was the extent of the evidence to justify the figure of 35%, in the light of the Framework policy which encourages a positive approach and promotes competition.

168. The Council has submitted convincing evidence that, since 2006, the percentage of non-A1 units in the primary shopping frontage has been at or around 35%. But the next step, namely consideration of whether this is a reasonable figure and what the consequences would be of a higher figure, has not been undertaken. The Council's approach assumes that the historical figure justifies the continuation of the amount of non-A1 uses.

169. However the evidence base suggests that Romsey is functioning well at present and this was confirmed by a number of site visits and by those making representations. On that basis, the policy approach is considered sound, although the evidence base in this respect is a matter which the Council could well consider when reviewing the RLP.

Ground floor uses in Andover (Policy LE13 and Map 46)

170. The position in relation to the primary shopping frontages in Andover is very similar to the approach adopted by LE12 in relation to Romsey. Again, the reliance on historic frontage data without any forward projections using different scenarios leads to some concern. However this is not sufficient to raise soundness issues, and is a matter which can be addressed by the Council at the review of the RLP.

Proposed development at George Yard/Black Swan Yard (Policy LE14 and Map G)

171. The evidence base clearly indicates the potential for further food and non-food retail development in the centre of Andover. This is especially the case given the likely population increase during the plan period. It is clear that there are few opportunities within the town centre where additional significant comparison shopping could be accommodated, and George Yard/Black Swan Yard is arguably the best location.

172. The only concern with policy LE14 and the associated map is the lack of any detail aside from a general identification of the proposed uses. This lack of detail appears slightly at odds with the supporting text which specifically refers to a development including around 100 dwellings.

173. However the development is not intended to come until later in the plan period, and the work to date has indicated a number of key constraints, not the least of which are heritage issues and access difficulties. Given the programming of the development, it is reasonable that no further detail be included in the policy at this stage, and the Council's commitment (by way of an additional modification) to produce a SPD is appropriate. The broad estimate of 100 dwellings is incorporated in the SHLAA (2014) (EB/LC15) and is appropriate at this stage.

Stockbridge local centre (Policy LE15)

174. The centre of Stockbridge serves the immediate needs of the town and a considerable rural hinterland. The High Street includes a wide range of retail, residential and service uses. Policy LE15 seeks to maintain this variety, focussing on the retail and service function, without preventing other forms of appropriate development. This is a sound approach.
175. The only issue is that, as submitted, the RLP did not define the extent of the local centre to which this policy applies. This would be amended by a modification to the text of the policy and an additional map (**MM/6/9 and MM/Map 47a**). With this modification, the policy is appropriate and justified by the available evidence.

Re-use of buildings in the countryside (Policy LE16)

176. Given the rural nature of much of the Borough, it is unsurprising that the Council considers that there may be a number of rural buildings which are no longer needed, that these are significant assets, and that their re-use needs to be managed. The principle of this policy is sound, and the discussion at the Hearing focussed on a number of the restrictive criteria within the generally permissive approach of the policy.
177. Two criteria in particular – requiring proposals to enhance their surroundings and restricting a new use to being primarily within the buildings, were considered in particular. However the Council's position, that the wording of the policy permits reasonable flexibility, is accepted. Conversely, I also considered whether the traffic implications of such proposals could be effectively controlled as the policy does not refer to traffic implications. However I consider policy T1 (below) to be sufficient to address this matter.
178. Part of the reasoned justification (paragraph 6.85) in the submitted RLP apparently conflicted with a criterion in the policy itself, and the text required clarification. This is provided by a modification (**MM/6/10**), and on that basis the policy is justified and necessary.

Employment sites in the countryside (Policy LE17)

179. The policy establishes the context related to the employment redevelopment of existing employment sites. Control over this type of development is clearly necessary in economic and environmental terms. The only issue relates to the fact that the supporting text requires that such a development deals comprehensively with the whole site. This could prove problematic if a site were occupied by a number of users.
180. The Council's position is that, given the location of these sites in the countryside, a comprehensive approach is necessary to ensure that a piecemeal development does not result in harm to neighbouring uses and the wider area. Although the policy would need to be implemented with a degree of flexibility so as not to stifle otherwise acceptable development, the policy is soundly based.

Tourism (Policy LE18)

181. Policy LE18 seeks to balance the benefits of the tourist economy with the preservation of the built and natural environment which has often attracted tourists in the first place. This approach is soundly based on the topic paper on Tourism (EB/LE28), which notes that the majority of tourist accommodation in the Borough is serviced.

182. With this background, it is important that the policy and the supporting text refer to all types of serviced and non-serviced accommodation, including caravan and camping sites (**MM/6/12 and MM/6/13**). Paragraph 6.96 refers to the requirement that seasonal structures are temporary in nature and do not have an adverse impact on the landscape. This should also be referenced in the policy (**MM/6/11**). With these modifications, the policy is appropriate and justified.

Environment - general

183. The RLP environment policies have been appraised through the SA (EB/AD3) and a soundness self-assessment has been carried out (EB/AD/11). Overall, the policies strike an appropriate balance between the elements of sustainability, protecting the Borough's environment whilst facilitating necessary development.

High quality development in the Borough (Policy E1)

184. Policy E1 is a general policy supporting high quality design and, by way of a modification (**MM/7/1**), resisting poor design which fails to improve the character, function and quality of an area. This is in line with Framework policy which seeks to resist poorly designed development.

185. I was concerned that the first criterion of the policy, with references to building materials and styles, could be seen to stifle innovation. However I accept the Council's position, which is that the references serve only to highlight local distinctiveness, in line with Framework policy.

186. There was also a concern that paragraph 7.14 only allowed for innovative design in areas of currently poor townscape. Innovative design would therefore tend to be resisted in areas of existing good design quality. Although the Council's position was that this was not the intention of the explanatory text, a modification is necessary to emphasise the role of good design in any area, regardless of its existing quality (**MM/7/2**).

Protection, conservation and enhancement of landscape character (Policy E2)

187. My only concern related to this general policy aimed at conserving and enhancing the landscape character of the Borough related to the age of the evidence base.

188. The policy is based on the Landscape Character Assessment 2004, which was prepared jointly with the County Council and the former Countryside Agency. This in turn was based on the Landscape Character Assessment Guidance for England and Scotland (2002).

189. Although I was concerned about the age of the assessment, as much has changed in some localised parts of the Borough, I agree that the overall Test Valley landscape has not changed to any significant degree. I am conscious of the policy in the Framework that environmental assessments should be proportionate and should not repeat policy assessments that have already been undertaken. On this basis, and allowing for future review of the Landscape Character Assessment during the life of the RLP, I consider this policy to be appropriate and sound.

Local Gaps (Policy E3 and Maps 48 – 56)

190. The Local Gap policy, which has a long pedigree in Test Valley is aimed at preventing coalescence between defined settlements. The related maps show the extent of the Local Gap in each case.

191. The policy in the Framework is that Local Plans should identify land where development would be inappropriate, for instance because of its environmental significance. A strategic approach should be adopted in local plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure. The coalescence of adjoining settlements, caused by development in the largely undeveloped gaps, would clearly have an environmental effect. The principle of such a designated area is therefore in line with national policy, and the numerous representations which have been submitted in support of and in opposition to this policy focus largely on whether the gaps have been appropriately defined.

192. The SA considers the benefits of a Local Gap policy (as opposed to considering any proposals on their merits). The background to the policy preparation is provided within the Council's Topic Paper on Local Gaps (2014) (EB/ENV15). In addition, PUSH has produced a Policy Framework for Gaps (2008), which sets out that the designation of gaps is essential to help shape the future settlement pattern, so as to allow for the considerable projected growth in the area whilst avoiding the loss of identity of settlements. PUSH sets out a recommended policy approach for its constituent authorities.

193. For similar reasons, and to ensure consistency across the Borough, the RLP also proposes Local Gaps around Andover. It is further noted that a number of adjoining authorities have Local Gap policies in their plans.

194. This policy, which is broadly restrictive in nature, runs counter to the general national approach to enabling development. However that approach is qualified by the Framework policy that such development should be located in the right place, and that the natural environment should be protected. Local Gaps include some limited developed areas, but there is no inherent reason why these should not be included in the defined area, and any redevelopment proposal can be dealt with on its merits – the reasoned justification to the policy makes it clear that the purpose of the policy is not to prevent all development within a defined gap.

195. The 2014 Topic Paper considers each of the proposed gaps in turn, and identifies their characteristics and importance. I appreciate that various representors have suggested that particular locations should be omitted from the designated area, but I am persuaded that the overall approach is appropriate and that the boundaries of the gaps themselves are justified by the submitted evidence.

Biodiversity (Policy E5)

196. There are 26 SSSIs, 4 Local Nature Reserves and 564 SINCS in the Borough. The variety and number of such sites and other biodiversity interests explains the importance of policy E5. (It also explains why it is not possible to list all the 'lower order' designations in the RLP, which may be susceptible to change.) The policy is aimed at providing effective protection for designated sites and appropriate mitigation, where necessary.
197. The background to the preparation of the policy is clearly set out in the Biodiversity Topic Paper (EB/ENV17). The policy is larger than most in the RLP, and this results in the reasonable decision of the Council not to have separate policies for different designations. The broad approach to biodiversity is similar in each case, subject to different controls in particular areas. This proportionate approach accords with national policy.
198. In particular, I agree that there is no clear need for a policy dealing specifically with the strategic mitigation approach for international designations, as the policy (together with interim mitigation frameworks) provides sufficient control.
199. National policy is that criteria based policies should provide a framework for considering proposals, and this is provided in the second, third and fourth elements of the policy.

Green infrastructure (Policy E6)

200. The RLP policy as drafted seems to require all development to positively enhance Green Infrastructure in all cases. The authority explained that this was not the intention of the policy, and an additional modification will make that clear. The policy is soundly based.
201. In June 2015, after the Hearings had concluded, the Secretary of State published a Written Ministerial Statement (WMS) entitled 'Local Planning', which set out considerations to be applied to proposed wind energy development. There were consequential changes to PPG. The approach in the Framework that Councils should consider identifying suitable areas for renewable and low-carbon energy is unchanged. However the expectation in the WMS is that any future wind energy development must be in such an area, as identified in a Local or Neighbourhood Plan.
202. The RLP formatting will be changed to separate Green Infrastructure, Climate Change and Water Management. Overall it provides a positive position that energy generating proposals which help mitigate and adapt to climate change will be supported within defined settlements and in the countryside – subject to other policies in the RLP. However the RLP does not identify suitable areas for wind energy development, and this was not an issue considered at the Hearings.
203. The RLP recognises that amendment to all or part of the plan may be required if it becomes inconsistent with the requirements of national policy. This was a matter specifically added to paragraph 12.18 following the Hearing in order to strengthen

the provisions for regular review and monitoring (**MM/12/1**). The Council advises that work on the review of the RLP will begin in late 2015.

204. In the absence of a RLP policy identifying suitable areas for development, proposals for wind energy development would be considered against the positive RLP position summarised above, other policies in the RLP, and national policies as material considerations.
205. Given the commitment in the Local Development Scheme and in the RLP itself (as modified) the commitment to an early review of the Plan is appropriate as a way of ensuring that the RLP is not unnecessarily delayed by this matter.

Water management (Policy E7)

206. The general approach in the RLP towards climate change is soundly based on the Framework approach to mitigation and adaptation. Individual sites have been assessed through the SA process in terms of a range of matters including flood risk.
207. Water supply is acknowledged to be an issue for the Borough, and policy E7 seeks to secure greater water efficiency in new development. However, as was agreed at the Hearings, these standards can almost always be technically achieved, but viability may be an issue in some cases. The reference to technical feasibility as reasons for not meeting the standards should therefore be omitted (**MM/7/3**). Linked to water supply and demand, the policy reasonably addresses changes to water quality.
208. There is no specific RLP policy on flooding, although there is a reference to national policy. However, in order to emphasise the proactive local approach towards flooding issues, a new paragraph is necessary to clarify the position (**MM/7/4**). Subject to that modification, the policy is in line with the national approach and is appropriate.

Heritage (Policy E9)

209. The policy sets out the considerations which should be weighed in the balance when assessing proposals affecting heritage assets. In some areas the submitted text does not precisely follow national policy and modifications are necessary to make the policy and text more accurately reflect the Framework. Just before and during the Hearing, the Courts issued a number of judgements regarding the approach to heritage assets, and modifications are needed to address that emerging position (**MM/7/7-11, MM/7/13-16**).
210. Other modifications are needed to clarify the approach towards the setting of heritage assets, to provide advice as to the location of additional information, and to emphasise a positive approach towards heritage issues (**MM/7/5, MM/7/6, MM/7/12, MM/7/17 and MM/7/18**). It should be noted that, although there are a significant number of modifications, many address the same points and there is no implication that the policy as originally submitted was fundamentally flawed. Subject to these modifications, the policy is in line with national policy and is appropriate.

Public open space (Policy LHW1)

211. The policy sets out standards for open space provision as part of new housing development. The general approach is reasonable, as new development should not exacerbate or cause problems in relation to the provision of or pressures on recreational open space.
212. The standards are largely those contained in the Borough Local Plan (2006) and there is nothing to suggest that these are deficient in any way. More recently various studies have supported the continuation of the standards, in particular the Public Open Space Audit (2012) (EB/L4), the Playing Pitch Strategy (EB/L1.1) and the Public Open Space Topic Paper (EB/L9). An additional standard related to allotments is supported by the Topic Paper.
213. In most cases the preference is that provision should be made on-site, but the supporting text also refers to the possible provision of off-site facilities. I have considered whether this should also be referenced in the policy itself, but conclude that the policy is sound in itself, and that the justification provides sufficient clarity related to potential off-site provision. The policy is appropriate and justified.

Ganger Farm, Romsey (Policy LHW2 and Map H)

214. The evidence base indicates a shortfall of formal playing fields in and around Romsey, to which must be added any additional demand arising from new housing development either as a result of RLP allocations or from windfall sites. The evidence largely stems from the Public Open Space topic paper (EB/L9) and the Playing Pitch Strategy (EB/L1.1). The shortfall in relation to football and rugby equates to around 8.6 hectares. This shortfall has existed for some time, and this led to the inclusion of this proposal in the 2006 Borough Local Plan.
215. This continuing need justifies the loss of the agricultural land, even though part of the site comprises 'Best and Most Versatile' land as defined in the Framework. The principle of an allocation for formal recreation purposes is justified, and planning permission was resolved to be granted after the Hearings closed for a housing and open space development. The Council's position is that this would deliver the requirements of policy LHW2.
216. As the site has been allocated for some time, I was concerned with the potential for delivery. But even leaving aside the resolution to grant planning permission, there is a pool of contributions arising from S106 planning obligations already allocated to this project, with the potential of more contributions, or CIL funding, to come. There is therefore a good potential for implementation.
217. In terms of the location of the site itself, accessibility to non-car modes of transport is being improved as a consequence of the implementation of a housing scheme at Abbotswood, an additional bus service, and a cycle route proposal. The issue of floodlighting is important due to the location of existing (and proposed) residential development, along with the effect on the Sir Harold Hillier Gardens and Arboretum. One of the criteria in the policy, strengthened by a modification (**MM/8/1**) addresses this matter, and the site is sufficiently large that any floodlighting can be positioned so as to minimise biodiversity and amenity impacts. Subject to this modification, the allocation is appropriate.

Forest Park (Policy LHW3 and Map I)

218. The Forest Park is a proposal of sub-regional significance, identified in the PUSH Green Infrastructure Strategy (2010) (EB/ENV11 and 12). The delivery of the Park was addressed by a Forestry Commission Study and is the subject of an Implementation Framework (EB/L8). The phasing of such a large project is likely to extend beyond the plan period.

219. The policy and the associated map are straightforward in that the map identifies the broad boundary of the Park within Test Valley. At this stage in the delivery of the Park, and given the range of parties potentially involved, nothing further is necessary or appropriate. Some funding for the implementation of the Park has been secured through planning obligations, and the Council envisages CIL as a source of funding. The delivery mechanism is in place to progress the Park, and the allocation is sound.

Amenity (Policy LHW4)

220. Policy LHW4 is a simple but necessary policy which seeks to protect the amenity of existing residents, and provide good standards of amenity for future residents. It is in line with Framework policy and is acceptable and necessary.

Transport – general and Managing Movement (Policy T1)

221. The overall approach to transport, as set out in the RLP and the Transport Strategy, seeks to manage patterns of growth and focus significant development in locations which are, or can be made sustainable - as assessed by the SA. This is in line with national policy in the Framework. Particularly through the use of Travel Plans, the approach is to facilitate and encourage the use of sustainable modes of transport, especially in larger schemes.

222. Policy T1 as drafted did not convey sufficient emphasis on the importance of sustainable transport measures, including Travel Plans, and this needs to be rectified by a modification (**MM/9/1**).

Parking standards (Policy T2 and Annex G)

223. The residential parking standards are expressed as minima and whilst the approach of the Framework does not preclude the use of minimum standards, it seeks to reduce dependence on the private car.

224. The Parking Standards and Managing Movement Topic Papers (EB/T12 and T13) reviewed the position, and considered the approach being taken by other authorities. In particular the rural nature of much of the Borough leads to a low percentage of the Test Valley population having no access to a car. This figure of 13.5% is lower than the equivalent figure for the southeast (18.6%) and England as a whole (25.8%). Given the limited accessibility to services in the rural area, this is unsurprising, and lends support to the Council's position. National policy recognises that different approaches are required in different communities and that opportunities to maximise sustainable transport solutions will vary from urban to rural areas.

225. Given the rural nature of much of the area, it is reasonable to anticipate that people will require space for vehicle parking at home, even if measures to discourage car usage are in place. The two positions are not incompatible. It is also noted that the policy allows for reduced parking provision in potentially accessible locations. For these reasons the policy and standards are appropriate.

Park & Ride at Bargain Farm, Nursling (Policy T3 and Map F)

226. The need for a park and ride facility in the general area around Southampton has a lengthy and sound background. Starting with a study on behalf of Southampton City Council and Hampshire County Council in 2002, there has been an identified need for a park and ride facility on this side of Southampton for many years. This need is reflected in Southampton's Core Strategy (2010).

227. Southampton's Core Strategy refers to three potential park and ride sites on the approaches to the city, whilst Solent Transport refers to the general benefits of park and ride. Unsurprisingly, there is no identification of specific sites in these documents. That is the role of the RLP.

228. Overall, the principle of a park and ride facility is in line with national policy related to the reduction in greenhouse gases and a reduction in congestion. It also reflects the advice in the Framework related to joint working with other authorities and transport providers to develop strategies and deliver infrastructure that maximises transport opportunities.

229. However my concern in relation to this allocation relates to viability and deliverability. This is a concern shared by the landowner. Solent Transport tested four potential sites, including Bargain Farm, using a set of assumptions regarding capital and operating costs. Bargain Farm was considered to perform poorly, and as such was not included as a strategic transport intervention in the Transport Delivery Plan to 2026.

230. Southampton City Council, which supports the Bargain Farm allocation, has pointed out that the site could also facilitate parking for specific key destinations, including the University of Southampton and Southampton General Hospital. Southampton City also indicates that they would be looking for commercial companies to take advantage of the opportunity. The Hospital has temporary facilities elsewhere, but has stated that Bargain Farm is one of their preferred locations for such a development. In the light of this, Test Valley Borough Council has proposed a modification (**MM/9/2**) to refer to a general public park and ride and/or a facility for specific named employers. This is a reasonable approach.

231. Retention of the policy in the RLP ties in with adopted policy in Southampton, and I can well appreciate the importance of this allocation in terms of joint working and further consideration of a park and ride facility in this location. Overall, although the principle of park and ride facilities in the general area has a sound pedigree and in principle support from the adjoining authority, there is much work to be done before the allocation can progress on the ground. On that basis, although I consider the allocation reasonable and supported by the evidence base, I strongly urge the Council to progress the deliverability of the allocation and review it at the earliest possible opportunity.

Skills and training (Policy ST1)

232. Policy ST1 provides that, where a development has a significant effect on the labour market, a contribution will be required towards skills and training. In the southern part of the area this is likely to take the form of a contribution to the PUSH Skills Strategy, whilst in Andover it would be in the form of other initiatives to address the relative skill shortage in that area.

233. Although national policy does not deal specifically with skills training, the approach of the RLP is in line with the emphasis in the Framework on economic growth and job creation. The approach has been successfully followed in a number of instances, based on a 2009 SPD, and the need to enhance skills and training is well founded in the evidence base. The policy complies in principle with the Framework approach to planning obligations.

234. Subject to a modification to provide necessary clarity as between the policy and the supporting text (**MM/11/1**) the policy is appropriate and justified.

Delivery, implementation & monitoring

235. The AMR, required by the Localism Act, is designed to monitor the planning policies in the area, and the requirements of the Local Development Scheme.

236. The AMR will particularly need to identify progress on housing and employment provision. The RLP has identified contingency actions in relation to housing delivery (RLP paragraph 5.102) and employment (RLP paragraph 6.47). A modification (**MM/12/1**) is necessary to specifically refer to these contingency actions and to commit the authority to an early review of the RLP if it becomes inconsistent with national policy. Subject to that modification, the delivery, implementation and monitoring approach is sound.

Assessment of Legal Compliance

237. My examination of the compliance of the RLP with the legal requirements is summarised in the table below. I conclude that the RLP meets them all.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The RLP is identified within the approved LDS November 2014 which sets out an expected adoption date of July 2015. While the adoption date has slipped somewhat, the RLP's content is compliant with the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI (EB/AD/9) was adopted in September 2013 and consultation has been compliant with the requirements therein, including the further consultation on the MMs.
Sustainability Appraisal (SA)	SA has been carried out (EB/AD/3&4) and is adequate. SA for MMs, incorporating Strategic Environmental Assessment March 2015 (TVBC 15).

Appropriate Assessment (AA)	The Habitats Regulations Assessment (November 2013), modified in March 2015, included an AA but that it concluded that there would be no adverse effect on any of the sites as a result of the RLP.
National Policy	The RLP complies with national policy except where indicated and modifications are recommended.
Public Sector Equality Duty	The RLP complies with the Duty (EB/AD13)
2004 Act (as amended) and 2012 Regulations.	the Act and the Regulations.

Overall conclusion and recommendation

238. The Plan has a number of deficiencies in relation to soundness and/or legal compliance for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explored in the main issues set out above.

239. The Council has requested that I recommend Main Modifications to make the Plan sound and capable of adoption. I conclude that, with the recommended Main Modifications set out in the Appendix, the Revised Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the Framework.

P. J. G. Ware

Inspector

This report is accompanied by an Appendix containing the Main Modifications.