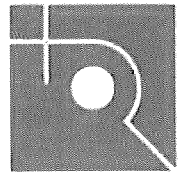


ENHAM PARK (LAND NORTH OF ANDOVER)  
TEST VALLEY NEXT LOCAL PLAN  
REFINED ISSUED AND OPTIONS CONSULTATION RESPONSE  
BELLWAY HOMES  
AUGUST 2020



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<input type="checkbox"/> Comment	<input checked="" type="checkbox"/> Submission	
Comments		Date August 2020
		Date August 2020
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# Test Valley Borough Council Next Local Plan - Refined Issues and Options Consultation

## COMMENTS FORM

Test Valley Borough Council has published for public participation its Refined Issues and Options document. This is the second stage of preparing the next Local Plan, which follows the Issues and Options consultation in 2018.

You can respond to our consultation by filling out the form below. Further information can be found on our website at: [www.testvalley.gov.uk/nextlocalplan](http://www.testvalley.gov.uk/nextlocalplan)

The consultation period runs from Friday 3 July 2020 to 4.30pm on 28 August 2020. Please respond before the close of the consultation period.

Once the form has been completed, please send to

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

### Contacting us

We are happy to help. If you have any queries, please contact us at:  
Planning Policy and Economic Development Service  
Test Valley Borough Council  
Beech Hurst  
Weyhill Road  
Andover  
SP10 3AJ

Tel: 01264 368000

Website: [www.testvalley.gov.uk/nextlocalplan](http://www.testvalley.gov.uk/nextlocalplan)

## Part A: Your Details

Please fill in all boxes marked with an \*

Title*	First Name*
Surname*	
Organisation* (If responding on behalf of an organisation)	

If you wish your comments to be acknowledged and to be kept informed of progress, please provide your email address below:

Email Address*	
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If you don't have an email address and wish your comments to be acknowledged and to be kept informed of progress, please provide your postal address.

Address*	
	Postcode

If you are an agent please give the name/company/organisation you are representing:

Bellway Homes in relation to the promotion of the land north of Andover (Enham Park) for a residential-led allocation.
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### Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment. All representations and related documents will be held by the Council for a period of 6months after the next Local Plan is adopted.

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

available on our website

<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

## Part B: Your Comments

Please use the boxes below to state your comments and questions. Please make it clear which paragraph or question your comments relate to where possible.

Paragraph / Question Ref	Comments
Introduction	<p>Bellway Homes (Bellway) is actively promoting land to the north of Andover (Enham Park) for a sustainable housing led allocation within the emerging Test Valley Local Plan (Appendix 1). Detailed submissions have been made to Test Valley Borough Council (TVBC) at each consultation stage to date, and these should be read in conjunction with this latest response.</p> <p>Bellway is currently one of the most successful property companies in the UK, with a reputation built on designing and creating fine houses and apartments, backed up by one of the country's best after-care services. Bellway properties are designed, built and marketed by local teams operating from regional offices managed and staffed by local people. This allows the company to stay close to its customers and take key decisions about design, build, materials, planning and marketing in response to local as opposed national demands. A simple point, but one which distinguishes Bellway Homes from other house builders.</p> <p>The comments provided are based on the <i>Refined Issues and Options Consultation 2020</i> document, and the 'tests of soundness' prescribed in NPPF paragraph 35. The Housing White Paper published in August 2020 proposes radical changes to the planning system, including the production of Local Plans. The government is also consulting on a revised standard methodology for calculating housing need. Whilst these points have also been considered in the consultation response, the responses to the specific questions of the consultation document remain based on the current plan-making process as prescribed in the NPPF.</p>
Q.1	<p>TVBC currently has two Housing Market Areas (HMA's); the southern (STV) and the northern (NTV). STV is constrained in respect of future growth as a result of important environmental designations and the impact greater development places upon them. This is likely to be a significant issue affecting growth in the south Hampshire region going forward. In comparison NTV, focussed on Andover, is relatively unconstrained with easy access provided to the strategic highway network (M3, A303, A34 and A338), a one-hour rail service into central London, as well as services to Southampton, Winchester, Salisbury and Basingstoke.</p> <p>The housing need requirement of the current Local Plan (policy COM1) splits the provision between STV and NTV. It is also important to</p>

	<p>consider that since the adoption of the current plan appeal decisions have supported a disaggregated approach to the consideration of 5-year housing supply, i.e. STV and NTV have been considered under separate land supply assessments.</p> <p>The current consultation document identifies that TVBC is yet to determine the emerging plan period. The consultation indicates there may be an emerging preference for further HMA's to cover the central rural part of the borough and allow for some sustainable growth within villages.</p> <p>Bellway believes that it is absolutely necessary to undertake a full review of HMA boundaries, as TVBC is doing, to ensure the plan reflects the most up to date spatial trends. This approach will ensure a sound basis for the new plan. It is important to highlight that the current trends also suggest that the HMA boundaries should not necessarily treat the borough in isolation, but instead take account of the wider surrounding region which is clearly interconnected.</p> <p>Ultimately in order to achieve sustainable development it will be essential that the focus of growth remains around the major centres, and specifically Andover given the growing constraints affecting STV. Whilst the rural area between Andover and Romsey could form an HMA in its own right, Bellway does not consider that the area is suitable or sustainable for large-scale housing growth.</p>
Q.2	<p>Bellway considers that the current assessment of HMA's needs to consider the interconnected relationship of the surrounding region, and ensure that the preferred approach allows for sufficient flexibility with neighbouring areas and settlements.</p> <p>The 2018 <i>Issues and Options</i> consultation document identified that 42% of residents work outside of the borough, with the top five out-commuting destinations being Southampton, Winchester, Eastleigh, Wiltshire and Basingstoke and Deane. It also noted 40% of those employed within the borough travel into Test Valley from Wiltshire, Southampton, the New Forest, Eastleigh and Winchester. The plan should also consider the proximity of the borough to central London, with the city representing an easy 1-hour commute from Andover train station.</p> <p>There is clearly an established interrelationship across the region and potentially beyond, given the easy rail commuting opportunities available to all the top five out-commuting destinations from Andover (such access is not available from elsewhere in the borough). The plan should look to identify and reflect these relationships and housing needs arising. In doing so, TVBC should not see these potential relationships and opportunities for increasing the level of housing delivery as being a detrimental outcome. Indeed, maximising housing growth in sustainable locations within TVBC will support the ongoing prosperity and vitality of the borough, as well as supporting the town centre regeneration aspirations for Andover and Romsey.</p>

	<p>In conclusion Bellway suggests that the emerging plan should take account of the relationship with neighbouring LPA's including Basingstoke and Deane, Wiltshire and the New Forest (District and National Park), as well as identifying if there are any opportunities to respond to unmet need issues arising within the Partnership for Urban South Hampshire (PUSH). It should also take into consideration the proximity of Andover to central London and the fact that the town is within easy commuting distance.</p>
<b>Q.3</b>	<p>National Planning Practice Guidance (NPPG) defines an HMA as “a geographical area defined by household demand and preferences for all types of housing, reflecting the key functional linkages between places where people live and work.” The guidance goes on to outline that HMA's can be defined through:</p> <ul style="list-style-type: none"> <li>• The relationship between housing demand and supply across an area, using house prices and rates of change in house prices.</li> <li>• Migration flow and housing search patterns – to determine the extent to which people move house within an area.</li> <li>• Contextual data such as travel to work areas, retail and school catchment areas, to provide information about the areas within which people move without changing other aspects of their lives.</li> </ul> <p>(NPPG paragraph 018, reference ID: 61-018-20190315).</p> <p>Bellway therefore suggests that TVBC should look to adopt a methodology that will lead to obvious and clearly definable HMA boundaries. Parish boundaries should therefore only be used if they fully reflect the extent of market areas. Failure to have clearly defined HMA's will lead to ambiguity and confusion and potentially a challengeable plan.</p> <p>In considering and determining an appropriate approach consideration should be to the points made in answering to Q.1 and Q.2.</p>
<b>Q.4</b>	<p>The plan's approach to settlement hierarchy's should be based on a sound and robust methodology for assessing and then categorising settlements within the borough. The process should not be manipulated to support development growth in unsustainable locations.</p> <p>As such, regardless of the approach taken, and number of hierarchy's included, the outcome should be a clear reflection of the context on the ground. Andover remains the principal settlement in TVBC, with a population of circa 40,000. As such it should remain a focus for growth to support services and economic growth for the town and wider hinterland.</p>
<b>Q.5 / Q.6 / Q.7</b>	<p>Bellway believes that the approach to establishing a settlement hierarchy should be based on a sound and robust methodology for assessing and categorising settlements. It should not be manipulated to support growth coming forward in unsustainable locations. As such, the methodology will determine how to categorise all settlements including rural locations.</p>

Q.8	<p>Bellway considers that settlement boundaries should be updated to reflect recent development, sites with existing planning permission and new allocations. Failure to include allocations, which could be outside of existing settlement boundaries, would lead to the spatial strategy effectively being out of date at adoption.</p>
Q.9 / Q.10	<p>The <i>Issues and Options</i> consultation document confirmed the current approach as being boundaries along physical boundaries of existing buildings and curtilages rather than more loosely around the edge of the built-up area. The very nature of the edges of settlements is that defining via physical edges is not necessarily clear, and can often exclude spaces that are widely considered part of the built-up area.</p> <p>Bellway believes that there is a need to ensure flexibility is incorporated into the emerging plan to provide adaptability and the opportunity to respond to rapid change, as per NPPF paragraph 11. The policy approach should not be tied to a physically defined boundary, but allow for flexibility and future changes in the nature of edge of settlements through the duration of the plan period. This is reflected in NPPF paragraph 72 which highlights that <i>"the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed."</i></p> <p>Therefore, regardless of the approach to defining settlement boundaries, allowing for flexibility and adaptability is key. A logical approach to defining settlements should be employed, to avoid land that is clearly part of the built-up area being excluded.</p>
Q.11	<p>Bellway considers that it would be logical to apply different approaches to settlement boundaries based on the scale and nature of the settlements in question. For the major centres and growth areas (Andover and Romsey), and as per the response to Q.9 and Q.10, it would be sensible to adopt a more flexible and looser approach to allow for flexibility and adaptability to changing circumstances over the plan period. Greater flexibility in these circumstances would also allow for safeguarded areas to be identified, where further development would be appropriate to meet future needs beyond the plan period or to meet any unmet need identified.</p> <p>In rural areas, where some growth in sustainable locations may be appropriate, it would be sensible approach to apply more rigid and defined settlement boundaries in order to ensure greater control against unregulated and harmful growth, in more sensitive locations.</p>
Q.12	<p>Bellway considers that settlement boundaries should provide further opportunities for limited growth beyond infill and re-development in the major centres of Andover and Romsey. See also response to Q11.</p>



<p><b>Q.13</b></p>	<p>Bellway believes self-build homes should be controlled by an appropriate planning policy framework, as per the process for all other housing delivery types. Any policy should also identify appropriate locations and context for the delivery of self-build housing.</p>
<p><b>Q.14</b></p>	<p>In general, Bellway considers that larger housing allocations should not include a proportion of serviced plots for self-build housing, specifically where the larger sites are not strategic in scale (c. 200-300 dwellings).</p> <p>It is considered that for such development sites, the inclusion of self-build plots would lead to logistical issues and also compromise the security and safety of the construction site. There is also clear scope for issues to arise in respect to clashes of architectural styles and materials, which could have implications on the overall character, integrity and sense of place delivered by the development.</p> <p>However, when looking at strategic scale sites, that are capable of delivering upwards of c. 600 – 1000 dwellings such as Enham Park, Bellway considers that it would be more feasible to identify small, self-contained sections of such sites that could be made available for the delivery of a modest number of self-build homes. Bellway considers that a Marketing Agreement would be required with the 'self-builders' to ensure delivery of these homes aligned with the overall phases and delivery programme of the development. A design coding approach could be employed to ensure some architectural control and synergy with the wider development. It is not considered that design coding would work on smaller sites because the level of self-build provision would not be sufficient enough to deliver an overarching but distinct character area.</p>
<p><b>Q.15</b></p>	<p>Bellway agrees that the provision of self-build housing as part of community-led development schemes would be an appropriate way of responding to the NPPF.</p>
<p><b>Q.16</b></p>	<p>Bellway believes that TVBC should seek to respond to the issue of climate change across all development requirements of the emerging plan. Self-build housing should not be exempt from such requirements, as it would undermine the plan's sustainability principles.</p> <p>Indeed, self-build development often seeks to achieve climate change responsive homes, beyond current regulations and guidelines. Therefore, TVBC could use the self-build process to further test construction ideas and technologies in support of advancing best practice. As such, the plan should look to encourage this.</p> <p>Ultimately one of the key ways to address climate change is through the identification of sustainable housing sites that are well located to existing major centres, employment, services and infrastructure. The land under Bellway's control to the north of Andover is such a location.</p>

<p><b>Plan period</b> (Chapter 4)</p>	<p>The current consultation document is non-committal in establishing a plan period. Bellway considers this to be a fundamental first step in the plan-making process from which all else follows, i.e. the quantum of development required and subsequent spatial strategy and infrastructure requirements.</p> <p>NPPF paragraph 22 sets a requirement for plan policies to look ahead over a 15-year period. Paragraph 1.15 of the consultation document outlines that adoption is anticipated in Q3 2024. A plan period to 2036 would therefore be deficient as it would only cover 12 years. Setting the plan period to 2040 would cover 16 years based on the current programme, and therefore also provide a small buffer for a limited level of programme delay. A 2040 plan period would also align with the timeframes proposed for the joint Statement of Common Ground (SOCG) being prepared by the Partnership for South Hampshire.</p> <p>Bellway considers that there is also scope for the plan to look longer-term, though the identification of safeguarded sites and future growth areas to provide certainty as to Test Valley's longer-term development needs. It is understood the joint SOCG will establish a longer-term vision to 2050, so there would a logic in aligning with this.</p>
<p><b>Housing need</b> (paras 5.2 – 5.10)</p>	<p>Bellway agrees with TVBC that the government's standard method for determining housing need represents a sound basis and starting point. The standard methodology is also based on backward looking trend data. As such it does not look forward, and it has been known for historic trends to underestimate growth. Bellway therefore considers that the standard method should represent the minimum requirement from which local circumstances and aspirations should apply (NPPF paragraph 60).</p> <p>In establishing the housing need, it will be essential for TVBC to consider the relationship with surrounding local authorities and settlements through the Duty to Cooperate (DTC) and wider unmet need. It is also important to note that the housing demand in TVBC (based on a housing requirement of 588 dwellings per annum (dpa)) currently outstrips supply, and there are also housing affordability issues identified in the borough.</p> <p>It therefore does not seem a logical progression to produce a plan that requires a lower level of housing than the current policy requirements. Instead TVBC's housing need should look to respond to the context of low affordability, demand outstripping supply and the housing delivery challenges of neighbouring authorities.</p> <p>The government is currently running a consultation on a revised standard method. The revised methodology generates a minimum housing requirement in TVBC of 813dpa; an increase of 48% against the current methodology. The government is actively seeking to support the increased delivery of housing, where it is needed most to address the housing crises. Bellway therefore considers that TVBC will need to</p>

	<p>give significant consideration to this increased need in the progressing the plan and identifying appropriate housing sites.</p>
<p><b>Duty to Cooperate</b> (paras 2.22 – 2.24 and 5.7)</p>	<p>Bellway considers that the current consultation document does not sufficiently address the DTC, the level of engagement that has taken place to date, what is proposed (especially within the joint SOCG) and how this impacts upon the emerging plan and growth requirements.</p> <p>Section 5.7 of the consultation document states that there is currently no evidence of unmet need in neighbouring local authority areas. Bellway does not consider this statement accurately reflects the growing housing pressures within south Hampshire, including the increasing environmental constraints, and the further challenges that will likely come forward over the plan period.</p> <p>The housing delivery challenges within the New Forest authority's has already been identified. In addition, the environmental implications of managing growth and development in south Hampshire are becoming more pressing. This is evidenced by the current issues relating to Nitrogen loading upon the Solent SPA, which has effectively frustrated the delivery of housing, and a long-term solution yet to be identified and implemented.</p> <p>Bellway considers that the TVBC plan should take account of the challenges affecting neighbouring LPA's including Basingstoke and Deane, Wiltshire and the New Forest District and National Park authorities.</p>
<p><b>Emerging spatial strategy</b> (paras 5.11 – 5.24)</p>	<p>Historically TVBC has focussed their spatial strategy on strategic-scale sites in and around the main centres of Andover and Romsey. The current consultation document identifies an emerging preference for an alternative approach that looks to focus growth within the town centres as part of wider regeneration proposals, as well as within rural villages, with some smaller (i.e. not strategic scale) sustainably located allocations.</p> <p>Bellway considers that some growth within rural villages is a sensible approach where it can support the ongoing sustainability and service provision of these settlements, if such viable and sustainable locations are identified. However, it is not considered that this approach will deliver the housing numbers required in TVBC over the emerging plan period, especially in the context of the proposed revised standard method. The 48% uplift on the current minimum standard method requirement would lead to just under a further 4,000 homes being required based on a 15-year plan period. As such Bellway concludes that the plan's overarching spatial strategy should be to seek to identify the most appropriate and sustainable locations for growth.</p> <p>In short, this will mean continuing to focus housing growth on the major centres of Andover and Romsey, where services, jobs and infrastructure are present. Housing provision should be tied to employment as much</p>

	<p>as possible to avoid increases in unnecessary commuting leading to increased impacts upon the highway network.</p> <p>Bellway does not consider it would be appropriate for substantial levels of housing need to be identified and delivered through Neighbourhood Plans, as this will result in an uneven and unsustainable distribution of housing within the borough. Neighbourhood Plans are unlikely to be adopted wholesale and are also produced over varying timescales, affecting delivery and housing supply, potentially restricting development and creating market uncertainty. Paragraph 5.22 of the consultation document suggests that a Development Plan Document could be produced going forward in the event Neighbourhood Plans do not delivering the desired growth. It is considered that this would simply delay the decision-making process in respect to where housing should be located, and subsequently the delivery of housing.</p>
<b>Local Gaps</b> (paragraphs 7.12 – 7.15)	<p>Bellway has outlined in previous consultation responses that they consider the continued application of gap policies to represent an unnecessary duplication of countryside policies, and are effectively an anti-development tool.</p> <p>It is pertinent to note the Planning Inspector's (Christa Masters, MA (Hons) MRTPI) initial conclusions on 'Green Gaps' following the examination of the Eastleigh Local Plan 2036 (examination document ED71, correspondence dated 1 April 2020, paragraphs 26-32). In the correspondence, significant concern is raised regarding the extent to which the designations were proposed to extend throughout the borough, the extent of land required and the methodology and evidence base to justify the proposed designations.</p> <p>Bellway considers that the application of countryside policy together with appropriate spatial planning and masterplanning of allocated sites can secure 'gaps' in perpetuity through the delivery of green spaces as part of proposals that would then ultimately prevent further outward growth and the merging of settlements.</p> <p>As an example, the concept masterplan for Enham Park would allow a large area of new public open space to be delivered in the northern part of the site in perpetuity, which would ensure no further expansion northwards, and a permanent 'gap' between Andover and Enham Alamein.</p> <p>In conclusion, Bellway would suggest that the continued use of gap policies should only be done so sparingly, and where it is not possible to secure through other mechanisms such as those described. They should not be applied across the borough as an anti-development tool where not fully justified.</p>
<b>Environmental matters</b> (Chapter 7)	<p>As already highlighted, the South Hampshire region and surrounding area is becoming increasingly constrained, especially in respect to environmental issues. The current nitrogen impacts upon the Solent SPA is a prime example where development is now required to</p>

	<p>demonstrate it is 'nitrogen neutral', or contributions to be made into an appropriate mitigation scheme, for development to be permitted.</p> <p>Bellway therefore considers that the environmental impact of potential development sites should be a key consideration in the site selection process, with priority given to sustainably located sites that do not lead to substantial environmental impacts, can demonstrate nitrogen neutrality and provide the potential to deliver environmental enhancement and biodiversity net gain (given this emerging legislation will be a requirement going forward over the plan period).</p> <p>Bellway has assessed the Enham Park site against Natural England's latest Nitrogen Neutrality methodology, and a significant nitrogen deficit is generated (Appendix 2). As such no additional Nitrogen offsetting would be required for this site. Allocation of the site would provide the opportunity to deliver a substantial new 'countryside park' to the north of the site, providing a clear opportunity to delivering environmental and biodiversity enhancements as part of the proposals.</p>
<p><b>Andover town centre regeneration proposals</b> (paragraphs 2.7, 2.11, 2.12, 5.17)</p>	<p>The consultation document points to an increasing focus on Andover town centre for delivering housing as part of a wider regeneration strategy. Bellway fully supports the regeneration proposals as it is important for town centres to remain a focus point in terms of retail, employment and leisure provision, supporting the economic growth and prosperity of the town as a whole. Greater support for town centres will be needed in a post-covid society.</p> <p>Housing in town centres will predominantly comprise flats and apartments. Whilst this is appropriate provision for such a location, it is important to highlight that a range of house types will be required, including family housing with gardens, to meet the borough's housing need. Bellway does not therefore consider that the plan should overly rely upon the town centre housing proposed to meet the bulk of the plan's housing need.</p> <p>Town centre regeneration proposals can be notoriously challenging to deliver, as they often include multiple land ownerships, development constraints, onerous infrastructure requirements and viability issues that can frustrate and delay development from coming forwards. Regeneration proposals in Poole in Dorset, Havant and Fareham in Hampshire are clear examples of these challenges. There is a danger if the plan places too much expectation on the regeneration proposals delivering a significant proportion of the plan's housing need. TVBC should also be mindful of the timeframes for delivery of the emerging regeneration vision in respect to housing delivery and the plan period. Alternative sites should be identified to ensure effective housing delivery and a positive 5-year housing land supply.</p> <p>Bellway considers that further housing growth within the town, in sustainable locations in close proximity to the town centre will be vital to generate further critical mass to support the town centre in terms of its retail, employ and leisure offers going forward. Therefore, the Enham Park site would provide further critical mass, whilst being sustainably</p>

	<p>located and therefore avoid placing greater strains on the town centre high way network and parking provision.</p> <p>It is also important to highlight that NPPF footnote 14 to paragraph 22 stipulates that a minimum 15-year period for strategic does not apply to town centre development. Paragraph 85d states that town centre policies should look at least 10 years ahead to meet the anticipated needs for retail, leisure, office and wider town centre uses. This needs to be factored into the delivery timeframes and phasing.</p>
<p><b>Enham Park opportunity</b> (land north of Andover)</p>	<p>Bellway is promoting the Enham Park site (land north of Andover) for a sustainable housing-led allocation (indicative site location plan is included at Appendix 1). The site provides scope to deliver a strategic-scale development of c. 1,000 homes, but Bellway would also be prepared to consider a smaller allocation, and/or full delivery across two plan periods (subject to the quantum proposed and viability for any smaller-scale allocation).</p> <p>Bellway has a long-term option for the site, which is owned by a single landowning family. The site is unconstrained, and the technical work progressed to date has not identified any significant issues that would challenge or frustrate the timely delivery of housing. Given the unconstrained nature of the site, it would be capable of early delivery in the first phase of the plan period, supporting an ongoing healthy 5-year housing land supply.</p> <p>The concept masterplan for the site (submitted previously and included as Appendix 3), would predominately provide family housing sustainably located in close proximity to Andover town centre. The importance of, and need for, new high-quality family housing within a spacious and green setting and with private rear gardens, has become more important than even following the Corona Virus pandemic, which has seen people confined to their homes and immediate surroundings. The Enham Park site provides a prime opportunity to deliver such housing.</p> <p>The masterplan also includes small-scale employment uses to the south of the site at the main entrance off the Saxon Way roundabout. A small local centre is also proposed to offer small-scale convenience retail and community uses for new residents as well as existing residents south of Saxon Way, where local service provision is poor. The development site is of a scale capable of accommodating retirement / care accommodation for the elderly, and an allowance has been made for the delivery of a new school should the development generate school places that exceeds current capacity.</p> <p>Since the last consultation, Bellway has spent considerable time assessing how the Enham Park development could support the wider town and complement the town centre regeneration proposals. As already highlighted, the town centre housing mix will largely comprise flat and apartment provision. The delivery of family housing with gardens would complement the town centre proposals providing an appropriate mix of house types to meet all future housing needs.</p>

	<p>As the plans at Appendix 4 highlight, the Enham Park site benefits from easy access into the town centre via multiple sustainable transport modes. There are multiple bus services within walking distance of the site, with direct services to the town centre taking between 10 – 15 minutes. The town centre is also easily accessible via bicycle, with multiple routes taking c. 10 minutes. One of these routes is through a continual green and 'off road' link via the Anton Lakes open space.</p> <p>Commuter cycling routes to the town centre would also be possible via the A343 (Redon Way) and then north along Saxon Way, or directly north along the A343 to the Saxon Way / Newbury Road roundabout. Both road links have substantial areas of green space either side of the carriageway, and it is considered that there would be sufficient space to create dedicated cycle routes within this underutilised land adjacent to the highway. Bellway understands that there is already an aspiration from town centre residents to deliver such cycle infrastructure, and allocation of the Enham Park site would further strengthen the rationale for delivery given the additional population that would benefit.</p> <p>Delivery of family housing will also provide further critical mass to support the retail, employment and leisure uses currently present and proposed in the town centre, especially given the ease of access from the site to the town centre.</p> <p>The concept masterplan incorporates a proposed area of open space across the northern part of the site, which would act as a buffer and transition to the surrounding countryside and ensure the provision of open space in perpetuity to prevent coalescence with Enham Alamein. A meeting was held with TVBC's Community and Leisure Team, and it was agreed that there was clear scope to deliver a country park as part of any site allocation. This would provide an important new recreational and leisure amenity for the future Enham Park residents and all Andover residents. Whilst Andover has numerous parks and open spaces, they are all urban in nature and there is currently limited access to the countryside for residents, especially those more centrally located in the town centre.</p> <p>Delivery of the country park and concept masterplan would create a new green spaces network that would run from the town centre, inclusive of the current additional landscaping proposals, in a northern direction through Anton Lakes open space and into the Enham Park site and country park. From this access into the countryside would be possible, along with a connection to the open space being provided as part of the East Anton urban extension (Appendix 5).</p> <p>Development in and around Andover will increase capacity on existing education infrastructure. The ability to provide increased school capacity in existing locations or in the town centre, to respond to the regeneration proposals and increased housing, is likely to be limited. Therefore, the ability to deliver a new school site within Enham Park, in its easily accessible and sustainable location, would further support the important infrastructure needs of the town. The school site is proposed to be located directly adjacent to the new country park, so would offer an ideal setting to deliver a high-quality learning environment.</p>
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	<p>Natural England's Nitrogen Neutrality model makes it difficult to achieve neutrality in brownfield locations. The town centre regeneration proposals are therefore highly likely to require substantial levels of nitrogen mitigation to offset the impact. This mitigation is likely to be costly and will add to the viability implications of delivering the plan. As mentioned, the Enham Park site generates a significant Nitrogen deficit of -615.7kg/year, which would be sufficient to offset the nitrogen load of a further c.250 dwellings<sup>1</sup>. Offsetting such a proportion of homes would have a significant impact on the level of wider nitrogen mitigation required.</p> <p>The current consultation document places a significant emphasis on delivering a fully sustainable plan from an environmental perspective, addressing the impact of climate change through appropriate offsetting and mitigation to compensate against the required growth. Paragraph 2.5 of the document outlines a proposal to offset the carbon emissions generated through delivery of the plan through tree planting. The country park would provide ample space to plant a significant quantity of trees to offset the development impacts of the town centre regeneration proposals as well as the Enham Park site itself. The country park could include Bilgrove Copse, an existing isolated area of woodland, and there is obvious scope to increase this woodland area through new planting.</p> <p>Over the plan period there will be a legal requirement for development to generate a net gain in biodiversity. As with the tree planting proposals, Bellway considers that the country park would offer plenty of opportunities for new and enhanced habitat creation to form a significant part of Andover's response to this requirement.</p> <p>The Enham Park site provides a sustainably located and unconstrained site in close proximity to the town centre, that is capable of delivering a significant level of new high-quality family housing and as well as numerous wider enhancements. The site would support TVBC in meeting the key spatial aspects of their corporate plan.</p>
<b>Housing White Paper</b> (August 2020)	<p>The government has recently published (August 2020) the Housing White Paper <i>Planning For The Future</i>, which sets out potentially radical reforms to the UK planning system, including the plan-making process.</p> <p>As opposed to detailed site allocations the revisions would see the identification of 'Growth Areas' that would grant the land outline approval for development. Bellway considers that this process could lead to faster delivery rates for housing, as the current plan allocation process, followed by the requirement to obtain outline planning application and reserved matters can take a considerable amount of time to negotiate.</p> <p>In identifying sites for growth, the process is proposed to be substantially simplified in terms of assessment and selection, with site's assessed against a standardised sustainable development test to</p>

<sup>1</sup> Based on 2.4 person occupancy per dwelling, connecting to the Fullerton WWTW which has no nitrogen permit levels and so 27mg/lit nitrogen level is applied.



	<p>ensure a correct balance between environmental, social and economic objectives as per the NPPF. In addition to this, the proposed reforms seek to generate greater benefits from development, leading to 'gains' as opposed to 'no net harm'.</p> <p>For the reasons already outlined, Bellway considers that their Enham Park site meets the NPPF's tests of sustainable development, and would also lead to the generation of significant social, environmental and economic gains. It would therefore meet the requirements for identification as a 'Growth Area'. In addition, this consultation response has identified an opportunity to deliver significant additional benefits to Andover as a whole through the delivery of the Enham Park site, through the proposed country park and complementing the town centre regeneration proposals, including offsetting potential impacts. Bellway therefore considers that the delivery of the Enham Park site would lead to environmental, social and economic gains.</p> <p>The reforms seek to further simplify the planning process through establishing nationally prescribed Development Management policies and developer contributions. This, in conjunction with a simplified allocation process, could suggest a potential lack of control and ability to secure the wider benefits associated with the Enham Park opportunity. However, from an initial review Bellway considers that the LPA would be able to retain control and secure wider benefits through the creation of masterplans, design guides / codes for Growth Areas, as well as the ability and the Local Plans would still be able to specify the form and type of development, and potential limitations, required.</p> <p>Going forward it will be important to understand the transitional arrangements for plans that have already commenced production, and Bellway would be happy to work with TVBC in understanding the implications of the White Paper on the emerging plan and delivery of the Enham Park site.</p>
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*Please use next page if necessary*

### **What happens next?**

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

All response received will be taken into account as part of the preparation of the next Local Plan.

## **Appendix 1: Enham Park indicative site location plan**