



Planning Policy and Economic Development Service  
Test Valley Borough Council  
Beech Hurst  
Weyhill Road  
Andover  
SP10 3AJ

Dear Sir/Madam

#### **Next Local Plan – Refined Issues and Options Consultation**

I am writing on behalf of Hallam Land Management Limited who previously responded to the Issues and Options Consultation in September 2018. Hallam is a strategic land promotion company and have control of the land to the south west of Andover which is suitable for a residential-led mixed use development.

The representations made at that time concerned the principal elements relating to the requirements of the new National Planning Policy Framework; an overview of Andover, including its role and function for the purpose of considering a Spatial Strategy; and the response to the relevant consultation questions. In addition, we submitted a Vision Document for the development opportunity at Littlebridge, situated to the south west of Andover. Together, those representations sought to demonstrate the role and function of Andover as the pre-eminent settlement in the Borough, its suitability as the continued focus for new development and the opportunity to create a Garden Suburb at Littlebridge to accommodate large scale development in a sustainable manner.

The Council has now published a further consultation document relating to Refined Issues and Options. The consultation document explains that the Council are not at the stage of determining development requirements or identifying potential sites for future development. The original representations continue to be relevant at the point the Council begin to consider those issues.

Since the Council published this consultation document the Government has published its White Paper entitled *Planning for the Future*. This is expressed as a fundamental reform of the plan making system and the form of Local Plans and their policies map, and the status given to land within a Plan area.

A new approach to the Standard Method for calculating each Local Authority's (LA) housing requirement is referred to, which would appear to result in a binding requirement given out by Government. This is intended to avoid debates on housing growth dominating discussions in the Local Plan process.

It will remain the responsibility of each LA to allocate land suitable for housing to meet the requirement, either as growth areas or renewal areas. This function of the Local Plan will be of heightened importance given the potential implication that Growth Areas will carry the status of an outline planning permission and Renewal areas will be subject to an enhanced presumption, therefore importance of the way in which

land for development is chosen and the uses and parameters defined for designated areas is of added significance.

Moreover, the Government suggest that Development Management Policies will be enshrined in a national volume of policies, which would remove the need for each Local Plan to set out its own version of such policies.

Clearly the Government's proposals, which are currently subject to consultation, are subject to change, but nevertheless they represent a fundamental change to the Local Plan process. We understand that primary Legislation will be required along with subsequent secondary legislation or Statutory Instruments (ie Regulations and Order) to bring about the changes referred to. This will undoubtedly take some time to achieve, but, draws in to question how the current revision to the Test Valley Local Plan is taken forward. No doubt the Council are looking carefully at this and any implications in terms of the principle of continuing with the Review and / or the timescales in the Local Development Scheme.

Our comments therefore to the current Local Plan consultation are made in the context of these circumstances and have regard to the potential changes that could arise during the period of time within which the Council are intending to progress the Local Plan.

### **Issues Important to Local Plan**

Pages 6 and 7 of the consultation document lists the themes of the Corporate Plan key issues identified in previous comments. Many of these can shape the location and form of future development, such as:

- Good availability of local services and transport links
- Helping local shops to thrive
- To live in an environment that is naturally and physically attractive
- To be able to live a healthy and active lifestyle
- Access to good local sports facilities which can be used for community activities
- Attractive and peaceful place to live
- Access to the countryside and green space
- Good travel networks and public transport
- Access to local facilities such as doctors, local shops and schools
- Clean and safe cycle paths
- Increased frequency of buses and public bikes

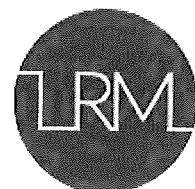
Large scale, mixed use development close to main urban areas provide the greatest opportunity to achieve many of these objectives. The Vision for Littlebridge has at its core this approach.

### **Plan Period**

Although not a question that the consultation document specifically asks about, the length of the plan period is important. The NPPF currently frames a plan period in the term "not less than 15 years from the date of adoption". On the basis of the LDS (page 8) this would suggest 2040, which would appear to align with the PUSH Spatial Position Statement (para 4.5).

### **Living in Test Valley (Housing and Communities)**

The Government's Standard Method for calculating a Local Authority's housing requirement suggests that 550 new homes need to be built in Test Valley each year. We agree that the Local Plan should aim to meet this need in full; we do not believe there are exceptional circumstances to warrant any reduction. Indeed, as the consultation document refers, the strength of housing demand locally is evidenced by the higher rates of development experienced over recent years following adoption of the Local Plan.



In addition, there will need to be consideration of accommodating unmet need from other LAs in the housing market areas. Given that Test Valley is relatively less constrained than other LAs in the respective Housing Market Areas, it can assist in meeting unmet need.

#### ***Housing Market Areas – Questions 1 - 2***

Presently, the Plan area is divided into two Housing Market Areas; southern and northern. Para 5.6 of the Local Plan describes this in the following terms:

“The SHMA has confirmed that there are two separate housing market areas within the Borough, which justifies maintaining a split housing requirement. Southern Test Valley forms part of the western or Southampton sub-area of the south Hampshire housing market area. The rest of the Borough lies within the central Hampshire housing market area. Within this area Andover has the characteristics of a self-contained sub-area market, due to its significant degree of self-containment of the local labour market and relative distance from other larger settlements”.

The focus for development in the Southern Housing Market area is Romsey. Romsey is a historic market town and whilst there are significant existing commitments at the town, the extent to which it can continue to grow and expand is limited by its environmental characteristics and constraints. In turn, this leads to a greater role for Andover in accommodating new development, which is comparatively less constrained in these terms. Therefore, the current delineation of the housing market areas may require adjustment so that new housing can be directed to the locations best able to accommodate new development in a sustainable manner.

#### ***Settlement Hierarchy – Questions 4 - 7***

These Questions are directed in the main at defining the settlement strategy for the rural areas. For the reasons set out in our September 2018 response, Andover is and must maintain its status as the main focus for new development in the Plan Area. Because of Andover’s pre-eminent role and function new development opportunities should be exhaustively considered in this location first and foremost.

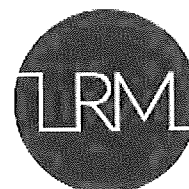
#### ***Self Build Question 13 - 16***

Para 61 of the NPPF indicates that planning policies should consider the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including ...people wishing to commission or build their own homes).

Under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. A policy framework to enable the Council to determine such applications is therefore important and should be included in the Local Plan.

Large sites provide the opportunity for land to be made available for self-build plots along with other types of housing. There are however practical considerations, for example, whether the interest expressed and evidenced on the self-build register is consistent with the location of the large allocations proposed, the cumulative number of potential plots relative to evidence of need, how design objectives will be secured to ensure a consistency of approach across the whole development, and arrangements for those plots to return to conventional housing for sale in the event there is no take up.

#### **Enjoying Test Valley (Environment and Quality of Life)**



There are no specific questions in this section of the consultation document, however, we would re-iterate our earlier comments in response to the section on Local Gaps.

Policy E3 of the adopted Local Plan designates Local Gaps in various locations in the Borough including Andover for the purpose of helping to define the character of settlements and in shaping the settlement pattern of an area. It is important to recognise that the boundaries of these Local Gaps were drawn in the context of the development requirements that existed at the time the Local Plan was being prepared and how these could be accommodated by new allocations. In the context of a new Local Plan which has additional development requirements that need to be accommodated, Local Gap designations should be reviewed. Such designations must be consistent with sustainable development and allow for provision of sufficient homes, jobs and other essential services.

Such designations, which are not afforded permanence in the same fashion as a Green Belt, are not immutable and can be subject to change or even deletion where on balance new development can be located that contributes to meeting development needs and the objective of creating a sustainable pattern of development. In those instances, considered masterplanning can ensure that the character and amenity of settlements continue to be protected.

### **Conclusions**

This response has sought to answer certain questions posed in the consultation document, highlighting again the important role and function of Andover and its potential to accommodate future housing, in preference to other locations in the District. However, there is a period of uncertainty associated with the planning system generally and Local Plans specifically, and the way in which the new Local Plan is prepared and its format may be different.

If we are able to assist you further in your consideration of potential growth at Andover and Littlebridge, please do not hesitate to contact me.

