

# 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

[Redacted]

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  
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SP10 3AJ

Tel: 01264 368000

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

[Redacted]



## 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:

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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
	<p>PLEASE REFER TO ACCOMPANYING REPRESENTATIONS</p>

*Please use next page if necessary*



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**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.





**TEST VALLEY  
NEXT LOCAL PLAN- REFINED ISSUES AND  
OPTIONS CONSULTATION**

**REPRESENTATION BY PEEL L&P GROUP  
MANAGEMENT LIMITED**

Date: 28<sup>th</sup> August 2020

Pegasus Reference: KW/GL/P18-1774/R004v3

**Pegasus Group**

**DESIGN** | ENVIRONMENT | **PLANNING** | **ECONOMICS** | HERITAGE

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## 1. INTRODUCTION

- 1.1 Pegasus Group are instructed by Peel L&P Group Management Limited ('Peel') to make representations to the 'Refined Issues and Options Consultation for the next Local Plan', which ran from 3<sup>rd</sup> July to 28<sup>th</sup> August 2020.
- 1.2 These representations follow on from those previously submitted by Peel to the September 2018 Issues and Options Consultation, also prepared by Pegasus Group, which outlined Peel's support for an early Local Plan Review and responded to the questions listed.
- 1.3 At the outset, we wish to reiterate our support for this Local Plan Review, and the Council's proactive approach to start the Review process in September 2018 when the current Local Plan didn't actually require formal review until January 2021. This proactive approach is clearly in line with the 2019 NPPF and the mandatory requirement to review plans every 5 years.

### ***Peel's Land Interests & Proposed Development***

- 1.4 Peel have legal control of 52.6 Ha (130 acres) of agricultural land at Bere Hill, to the south east of Andover, and are seeking to promote it for residential development through the emerging Local Plan process for 700 + units. The full extent of the site is illustrated below.

Figure 1.1 – Peel Ownership



- 1.5 We provide more detail on the proposed development within the Summary Development Framework attached at **Appendix 1**. A version of this document was initially submitted to the September 2018 consultation but was updated for the Council's call for sites in October 2019 to incorporate the findings of technical analysis commissioned in respect of landscape, ecology and



highways matters; which were elements the Council had requested more information on at an initial meeting in September 2018. This document ultimately demonstrates that the site is entirely suitable, available and achievable for residential development.

1.6 For clarity, we also provide the associated technical reports:

- Landscape and Visual Statement prepared by Pegasus Group (May 2019) – **Appendix 2.**
- Preliminary Ecological Assessment prepared by TEP (Ref: May 2019) – **Appendix 3.**

1.7 It is also pertinent that since 2018 Peel have rolled out a new housebuilding arm, Northstone, which allows Peel to open up sites ensuring immediate delivery working with partners, rather than simply being a promoter. This also allows them to partner up with Registered Providers earlier in the process if required, to ensure delivery of the required levels of affordable housing.

1.8 To clarify, details of this site have previously been submitted to the following 'call for sites' processes:

- **2014 SHLAA (Site ref: 198)** - for up to 1,000 units across a larger 111 Ha (274 acres) site; although it was not allocated within the adopted Local Plan (2016).
- **2017 SHELAA (Site ref: 247)** - for up to 700 units, across the current 52.4 Ha (129 acres) site (of which 18.9 Ha (47 acres) was considered deliverable). This concluded that change in policy would be required to allow the site to come forward.
- **2019 SHELAA (Site ref: 247)**- for 700 + units. The submission was accompanied by the attached Summary Development Framework which confirms that the site is entirely suitable to deliver this amount of residential development.

1.9 The site was also promoted on the basis of 700 + dwellings through the earlier 2018 Issues and Options Consultation. We continue to promote the site on the basis of it delivering at least 700 dwellings, which is shown to be entirely achievable as demonstrated in the Summary Development Framework enclosed at Appendix 1.

### ***Representation Structure***

1.10 The remainder of this report is structured as followed, with reference to the questions considered most relevant to Peel at this stage:

- In **Section 2** we describe the site, its surroundings and the proposed development in more detail;
- In **Section 3** we provide a settlement profile of Andover and its position within the settlement hierarchy of Test Valley;
- In **Section 4** we look at economic growth within Test Valley in recent years, and how this compares with the assumptions that underpinned the adopted plan and its evidence base;



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- In **Section 5** we comment on 'Chapter 3- Vision and Objectives' and 'Chapter 4- Plan Period';
  - In **Section 6** we comment on 'Chapter 5- Living in Test Valley' addressing questions 1-16;
  - In **Section 7** we comment on 'Chapter 6- Working in Test Valley' addressing questions 17-18;
  - In **Section 8** we comment on 'Chapter 7- Enjoying Test Valley';
  - In **Section 9** we comment on 'Chapter 8- Infrastructure and Community Facilities'; and
  - In **Section 10** we summarise and conclude our representations.



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## 2. SITE CONTEXT & PROPOSED DEVELOPMENT

### The Site and Surroundings

- 2.1 As noted in section 1, and set out in more detail in **Appendix 1**, the site comprises 52.6 Ha (130 acres) of agricultural land at Bere Hill, adjoining the built-up area to the south of Andover, and designated as countryside in the adopted Local Plan (dated 2016) under policy COM2.
- 2.2 The site is bound by existing residential development to the north, the A303 Andover Bypass to the south, Andover Golf Club to the west, with a small complex of residential dwellings called the Grange, surrounded by agricultural fields to the east. The field to the north of the Grange is being promoted for development by Gallagher Estates Ltd; with the field to the south (known as Bailiffs Bottom) owned by the Council. The Picket Twenty residential development is further east beyond the A3093 road.
- 2.3 In terms of access, the site connects with Micheldever Road to the north east and Old Winton Road to the north west; whilst there are two PROWs crossing the site (one running north south and one east west past the existing Bere Hill Farm) and one, Ladies Walk that traverses the northern boundary, and is lined with a thick stand of mature trees creating a key local recreation feature.
- 2.4 Whilst the land is slightly elevated from the main settlement to the north, topography within the site is relatively flat and perfectly developable for residential dwellings, and the thick tree stand around Ladies Walk provides a large amount of visual containment, screening the site from the key views southwards from the town, and preserving the effect of the 'Andover Bowl'. The tree cover towards the southern boundary of the site along the A303 has also matured and provides effective screening in this direction too. Furthermore, the landscape and visual analysis contained in the Summary Development Framework notes that despite being above the 90m contour, the unique situation of the site in terms of its topography, surrounding landform, and strong existing vegetation framework presents a site that could be delivered with minimal effects on landscape character or visual amenity.
- 2.5 The site is not in a Flood Risk Zone and is not subject to any statutory or local environmental designation. There are some sites of local nature importance (SINCs) and TPOs adjacent to the site, but these can be incorporated into the development without any impact. The agricultural land classification for the site is predominantly Grade 3a, however this is the case for all the land around Andover.
- 2.6 In terms of ecology TEP have undertaken a Preliminary Ecological Assessment, as summarised in the Summary Development Framework. The technical work confirms that the development of this site will not impact upon any statutory or non-statutory designated sites. Furthermore, the site does not contain any ponds or other key habitat features and is instead characterised by habitats of low ecological value including arable fields and semi-improved grasslands, with higher value hedgerows and woodland largely retained. Further ecology surveys may be needed in support of



any future planning application, including bats, reptile, dormouse, nesting birds and pre-construction checks for badgers. The report ultimately concludes that there are no ecological or arboricultural constraints preventing the development of the site.

- 2.7 In heritage terms, whilst there is a Grade II Listed Iron Bridge immediately bordering the site to the north, this can be integrated with the development with minimal impacts, and there are no other Listed Buildings or other heritage designations within or adjacent to the site.
- 2.8 The site is located in a very sustainable location within 900m of Andover Town Centre, which includes five supermarkets, a range of other national retailers, a Leisure Centre, College and various office and employment developments. There are also 2 doctors surgeries on the edge of the Town Centre and a hospital within 2.5km.
- 2.9 Furthermore, there are two convenience stores within 350m of the site which are accessible by foot; whilst Walworth Business Park, a major employment area, is just 1km to the north east. In respect of education, there are a total of 6 schools within 1.5km of the site and 20 within 5km.
- 2.10 The nearest Railway Station to the site is Andover, which is approximately 2.2 km to the north west of the site and provides direct services to London and other major towns; whilst the bus stops on Leigh Road and Shepherds Row within 350m of the site, offer localised services between Andover and its suburbs.
- 2.11 The site therefore benefits from a highly sustainable location in relation to Andover's existing local facilities and services.

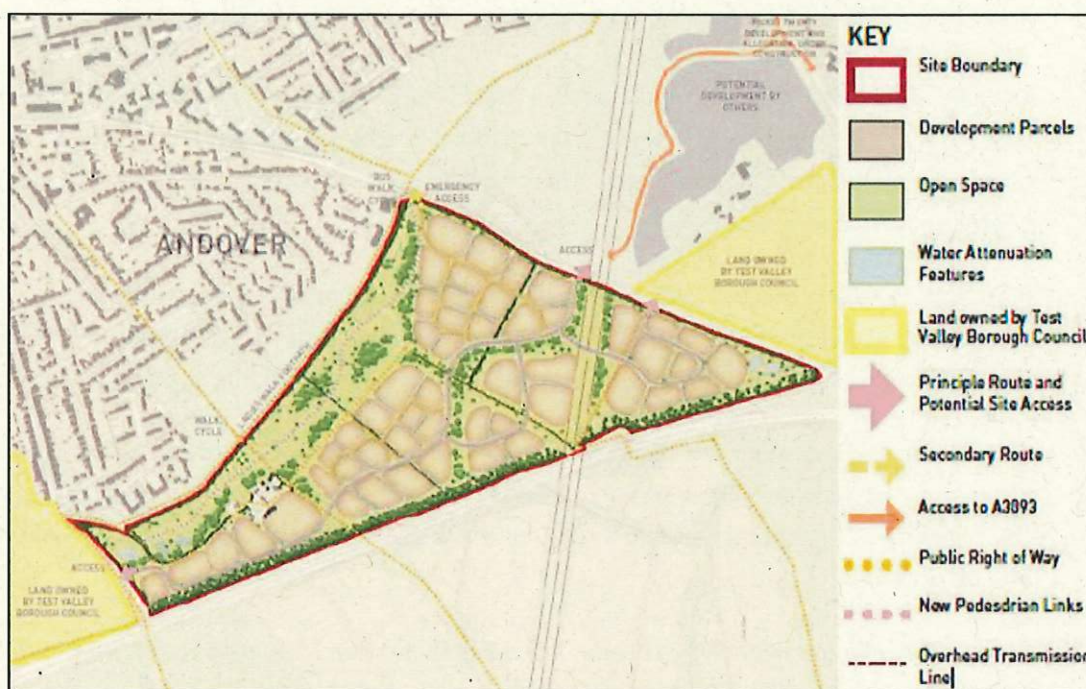
### **Proposed Development**

- 2.12 As explored in detail in the Summary Development Framework, Peel are promoting this site for allocation within the emerging Local Plan Review for a minimum of 700 units, with the capability to provide in excess of this. The illustrative layout overleaf presents the latest scheme for the site.
- 2.13 As noted in section 1, in addition to their traditional role as a promoter, Peel now have the ability to enable immediate delivery of this site themselves through their new housebuilding arm, Northstone, working with partners; thus providing a guaranteed end user for the site if required, which boosts the deliverability credentials of the site. This could also allow Peel to partner up with a Registered Providers at the outset, if required, to ensure delivery of the required levels of affordable housing.
- 2.14 The masterplan focusses the development on the southern and eastern sections of the site to avoid the higher ground to the north west and to provide a generous buffer to Ladies Walk footpath and the Iron Bridge. This also ties in with the development proposed by Gallagher Estates on the land to the north east, and therefore offers an integrated design across the wider land.



- 2.15 This illustrative plan, which will be subject to review and refinement over time, shows development across 44 development parcels with a net developable area of approximately 20 Ha (49 acres), giving net densities of 35 dph. The development will have a clearly legible hierarchy of streets providing connectivity and access to local facilities.

*Figure 2.1 – Latest Illustrative Masterplan*



- 2.16 SCP Transport have prepared an Access Assessment which has fed into the Illustrative Masterplan. Primary vehicular access into the site can be taken from 3 options, as shown above:
- Via the A3093 to the east, through Council owned land and via the existing Picket Twenty roundabout which has an available arm allowing direct connection;
  - Via the A3093 to the east, via a new roundabout proposed to serve the Grange Development (to north of existing roundabout/ Council land); and
  - From Winchester Road to the west through Andover Golf Club (owned by Test Valley Borough Council), via a priority junction with right turn ghost lane.
- 2.17 All three of these accesses are achievable, but only one is required to serve the site on capacity grounds, subject to suitable internal access loops, which are included on the Illustrative Masterplan. Secondary and emergency access is proposed through Micheldever Road to north, with associated pedestrian and cycle connections to Ladies Walk and the wider footpath network.
- 2.18 A full consultant team has been appointed to investigate a range of environmental and technical matters, and further reports and detail will be submitted to the Council as the Local Plan review process progresses. This includes additional work on highways, landscape and ecology which have



been undertaken and as summarised in the October 2019 summary Development Framework (with the Landscape and Ecology reports attached at **Appendices 2 & 3 respectively**). In particular, the Illustrative Masterplan has been very much influenced by the landscape and visual analysis undertaken for the site, which has identified the most sensitive areas in landscape terms and has informed the extensive landscape buffer in the north of the site.



### **3. ANDOVER SETTLEMENT ANALYSIS**

#### **Andover's role within Test Valley**

- 3.1 Andover<sup>1</sup> is the largest settlement in Test Valley and is located in the north of the Borough. It had an estimated population of 40,592 in 2011, which increased to 47,766 in 2018. This equates to growth of 7,174, or 17.7%. In comparison, Test Valley saw its population increase by 9,500 (8.1%) between 2011 and 2018, from 116,700 to 125,200. Andover's growth was therefore significantly higher than the Borough's and the area now accounts for 38.2% of Test Valley's population.
- 3.2 Andover has direct train access into London Waterloo and the A303 Andover Bypass also forms a direct road route to London via the M3, making it an attractive commuter location.
- 3.3 Andover is classed as a Major Centre in the Settlement Hierarchy of the adopted plan along with Romsey, which is less than half its size (estimated at 19,441 in 2015), albeit Romsey forms a wider urban area in the south of the borough with several smaller settlements classed as Key Service Centres (Chilworth, North Baddesley, Nursling & Rownhams and Valley Park); whilst the remainder of the borough is made up of small rural villages.
- 3.4 The Council employ a split housing requirement for Northern and Southern Test Valley and have done since the 1980's reflecting the different housing market areas, as Southern Test Valley, which comprises the urban area around Romsey and surrounding villages, has a close relationship with the South Hampshire sub-region and is included in the Partnership for South Hampshire (PFSH) SHMA; whilst Northern Test Valley (i.e. the remainder of the borough further north) is more of a self-contained Housing Market Area centred around Andover.
- 3.5 The Adopted Local Plan directs 67% of housing growth to Northern Test Valley, of which 90% is apportioned to Andover itself (so approximately 60% of the borough total), based on job forecasts and to allow Andover to support new retail and leisure facilities.
- 3.6 This demonstrates that Andover is the dominant settlement and employment centre within Test Valley, and the only significant settlement within Northern Test Valley. It has a fast-growing population and as such it would seem the obvious focus for further growth.

#### **Growth within Andover**

- 3.7 In terms of existing growth and development patterns within Andover, the key diagram from the Adopted Local Plan provides a useful overview of the existing position and expected growth up to 2029.

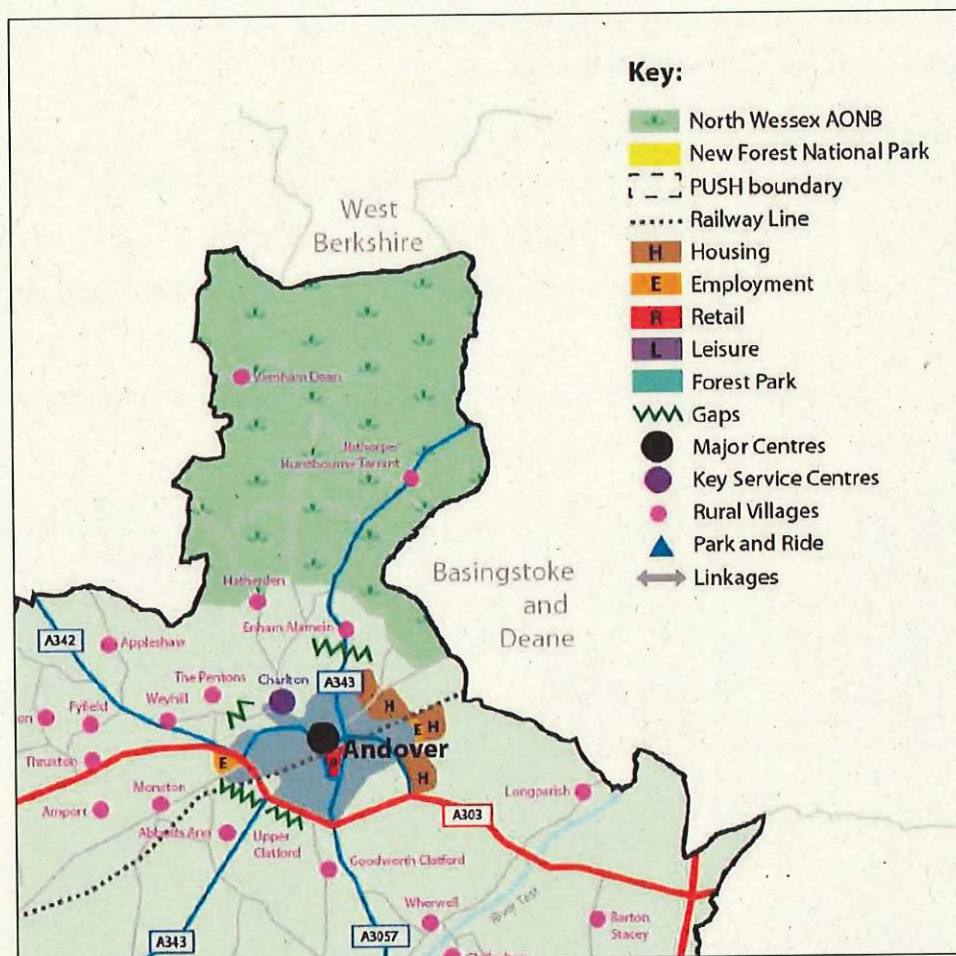
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<sup>1</sup> Andover is defined as the following wards: Harroway; Millway; Winton; St Marys; and Alamein. This is consistent with the definition used in *Andover Town Profile, June 2017*, produced by Test Valley Borough Council.



- 3.8 In headline terms this shows a large urban area, with the retail core slightly to the south of centre, the A303 bypassing the town to the south and the railway line running through the centre. The Key Service Centre of Charlton abuts the town to the north west, with several smaller rural villages just beyond to the west and south west (including Penton Mewsey and Upper Clatford), with fairly small levels of separation. There are protected local gaps to maintain separation to the south west, north west and north.

*Figure 3.1 – Extract from Key Diagram – Adopted Local Plan 2011-2029*



- 3.9 The land surrounding the urban area is designated countryside (under Policy COM2) with some Sites of Importance for Nature Conservation (SINCs) to the south, beyond the A303, and to the south east, beyond the existing residential development at Picket Twenty.
- 3.10 Beyond the Town Centre there are key employment locations at West Portway Industrial Estate and Andover Airfield Business Park to west and Walworth Business Park to the east. Andover Airfield Business Park is allocated under Policy LE9 for B1, B2 and B8 uses across approximately 48 Ha (119 acres); whilst an extension off 11 ha (27 acres) to Walworth Business Park is proposed for B1(b), B1(c), B2 and B8 uses. These are both continuations of allocations from the previous 2006 Local Plan.



3.11 In terms of housing, growth is focussed to the east of Andover with two allocations at:

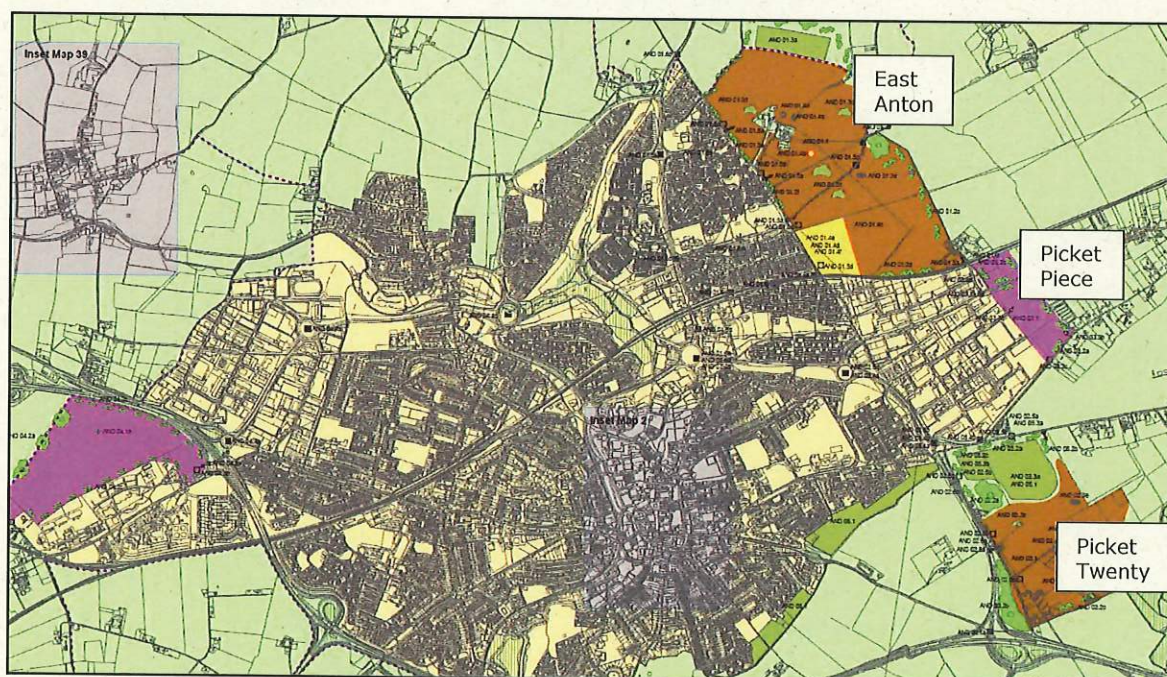
- **Picket Piece (Policy COM6)** – 400 dwellings and associated facilities;
- **Picket Twenty (Policy COM6A)** – 300 dwellings and associated facilities (extension to existing Picket Twenty Development;

3.12 There is a further mixed-use allocation within Andover Town Centre 'George Yard/ Black Swan Yard' (Policy LE14) which is proposed for retail, offices and up to 100 residential units. The remainder of the housing requirement in Northern Test Valley is to be delivered via committed developments, SHLAA sites and windfall developments.

3.13 As with the employment allocations, the pattern of housing growth to the east of Andover was largely established by the previous 2006 Local Plan, which ran until 2011, and allocated 3,700 across the following two sites (shown on the proposals map below):

- **East of Icknield Way/ East Anton (AND.01)** – 2,500 dwellings together with a range of associated facilities.
- **Picket Twenty (AND.02)** – 1,200 dwellings together with a range of associated facilities.

*Figure 3.2 – Proposals Map- 2006 Local Plan*



#### **Current Housing Commitments in Andover**

3.14 Based on the last two adopted plans, there are three significant residential developments east of Andover and we assess these in more detail below:



### ***Picket Twenty – Persimmon Homes***

- 3.15 This site has been brought forward by Persimmon Homes, who obtained outline consent for 1,200 homes back in 2008 (Ref: TVN.09275). Appendix 1 of the December 2019 Test Valley Housing Implementation Strategy confirms that site delivery was completed in the year 2018/19. The Picket Twenty Development Update (October 2018) also confirms that occupation figures provided by the Developer show that all of the original 1,200 permitted homes have now been sold.
- 3.16 A further additional phase of 14 units (Ref: 16/01461/FULLN) was granted in December 2016 and were under construction as of 1<sup>st</sup> April 2018, therefore are now complete. An additional 17 units (Ref: 17/03027/FULLN) were also granted in May 2018 and it is understood that construction was due to commence this year. This indicates an overall total capacity of 1,231 dwellings in Picket Twenty.
- 3.17 The development includes a local centre with an operational primary school, nursery and community centre. A large area of open space and playing fields, known as Harewood Common is located to the north, on an area of higher ground.

Fig 3.3 - Picket Twenty development



- 3.18 Persimmon Homes are also bringing forward the Picket Twenty extension, after gaining outline consent for 520 further dwellings in January 2018 (Ref: 16/03120/FULLN). Table 2 of the Council's Housing Implementation Strategy (December 2019) confirmed that as of April 2019, 475 dwellings



were remaining, with completion anticipated in year 2022/23; however we have been unable to get a further update since then.

- 3.19 There was a previous commitment to the north of Picket Twenty on land at Harewood Farm for 180 dwellings (Ref: 14/00774/OUTN) which gained outline consent in 2015, however this has now expired because no Reserved Matters were submitted within the required 3 year timescale. This consent is not referenced in the Council's latest Housing Implementation Strategy. A revised December 2017 scheme is currently pending determination (Ref: 17/03153/OUTN), which was submitted by Mr M Raymond and there is no housebuilder connected at present. The Council include land at Harewood Farm within their supply of identified capacity<sup>2</sup>, indicating that 120 dwellings are expected to be completed between 2019/20-2023/24; however this is now considered unlikely given there is still no housebuilder attached to the site, the outline application is yet to be determined and delays associated with COVID-19.
- 3.20 Overall, committed development on this allocated site is 1,751 dwellings, against a plan requirement of 1,500 dwellings; therefore a surplus of approximately 251 dwellings. If the Harewood Farm application to the north of the allocation is approved, this will equate to a surplus of 431 dwellings in this area.

***Picket Piece –David Wilson Homes***

- 3.21 Wates developments achieved outline consent for 530 units on this site in June 2011 (Ref: 10/00242/OUTN & APP/X3025/A/10/2140962) following an appeal. This has been built out in phases by David Wilson Homes through several Reserved Matters consents.

Fig 3.4 – Picket Piece development



<sup>2</sup> Table 3, page 21 of December 2019 Housing Implementation Strategy.



- 3.22 According to the 2019 Housing Implementation Strategy, only 5 dwellings remained to be completed as at 1<sup>st</sup> April 2019, therefore it is now assumed that the full 529 dwellings have been delivered.
- 3.23 David Wilson Homes are also bringing forward the Picket Piece Extension. An additional 424 dwellings on site have been secured through a series of outline and full applications, as summarised below.

*Fig 3.5 – Additional consents at Picket Piece*

Address / Application Reference	No. of Units
Landfall Walworth Road Picket Piece - 14/00670/OUTN	24
Land adj Depot Ox Drove - 14/01174/FULLN	6
r/o 22 & 22a Walworth Rd - 14/01176/FULLN	9
School site - 14/01341/OUTN	63
r/o 8A Ox Drove - 15/00667/OUTN	25
Land at Picket Piece Ox Drove - 15/01377/RESN	129
'At Last' Ox Drove - 15/02013/FULLN	2
North of Walworth Rd - 15/03150/OUTN	53
Land North of Walworth Road - 16/00544/OUTN	30
Land Adj 10 Walworth Road - 82 dwellings - 16/01329/OUTN	82
Land Between 17 And 17A Walworth Road - 18/00602/FULL	1
<b>Total</b>	<b>424</b>

- 3.24 400 dwellings from the Picket Piece Extension are included within the Council's 2019 Housing Implementation Strategy, with 319 dwellings remaining as of 1<sup>st</sup> April 2019 and completion expected beyond 2024 (77 dwellings assumed to be delivered post five-year period).
- 3.25 Contact with the sales team at David Wilson Homes indicated that David Wilson have delivered nearly all of their latest phases (6 dwellings remaining), however did not have information on Barratt Homes delivery rates. They indicated that delivery and demand was still strong, albeit they do expect about a 6-month delay to anticipated overall completion given delays associated with COVID-19.
- 3.26 A full planning application for 16 additional dwellings on the site (Ref: 19/01485/FULLN) is pending determination.
- 3.27 Overall, committed development on this site is expected to deliver a total of 953 dwellings against a plan requirement of 400 dwellings, a surplus of approximately 553 dwellings. If the live planning application is approved, this will be a surplus of 569 dwellings.

#### **East Anton – Taylor Wimpey**

- 3.28 Taylor Wimpey gained outline consent for 2,500 dwellings and associated employment, schools, local centres and other developments, back in 2008 (Ref: TVN.09258).



- 3.29 This has been built out in phases, and according to the 2019 Housing Implementation Strategy, 1,820 dwellings have been completed with 664 remaining as of 1<sup>st</sup> April 2019. These are projected to deliver at an average rate of 166 dwellings per year and to be completed by 2023. Pegasus spoke to a sales representative on site who did not provide the detailed breakdown of the number of homes delivered but advised that mid-late 2023 remains to be the anticipated completion date for the 2,500-dwelling scheme.
- 3.30 Outline consent for a further 350 units was granted in 2015 on surplus land which had previously been set aside for a secondary school (Ref: 12/02497/OUTN). Reserved Matters approval (18/03140/RESN) was granted in March 2019 for 314 dwellings. The 2019 Housing Implementation Strategy confirms construction was not underway as of 1<sup>st</sup> April 2019, with completion expected in 2023/24 at an average rate of 63 dwellings per annum. Pegasus spoke to a sales representative on site who advised that the construction of these additional 350 units has not commenced, therefore it is unlikely that these will be completed by 2023/24. Delays associated with COVID are likely to push this back further.
- 3.31 Another 20 units were also granted consent as part of the development of the Northern Local Centre within East Anton (Ref: 15/00729/FULLN) and these were built out during 2017.
- 3.32 So, overall, committed development on this site is expected to deliver a total of 2,854 dwellings against a plan requirement of 2,500 dwellings, a surplus of approximately 354 dwellings.

*Fig 3.6 – East Anton development*





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### ***Other Developments***

- 3.33 Sentinel Housing and Foreman Homes delivered a 85 residential unit scheme (Ref: 16/00872/RESN) at Land at Goch Way, Andover, which was completed in summer 2019.
- 3.34 There are 4 smaller developments within Andover which are contained within the 5-year supply, 2 of which was already under construction in April 2019 (therefore assumed to now be complete) and the other 2 expected to commence this year or next (therefore may be delayed by COVID-19).
- 3.35 Allocation LE14 'George Yard/ Black Swan Yard' does not have permission yet and is not expected to begin delivering until 2025/26.

### ***Andover Town Centre Strategy***

- 3.36 Paragraph 2.11 of the Refined Issues and Options Consultation Document notes how master-planning is underway to redevelop Andover Town Centre, with public consultation undertaken with local businesses and residents in July 2020. Paragraph 6.5 of the document later notes how the master-planning exercise for Andover Town Centre will likely introduce some new homes, which would be counted towards the Council's housing land supply.
- 3.37 Consultation is still at the very early stages, however exhibition material from earlier this year<sup>3</sup> shows the emerging vision and spatial framework for the Town Centre. Page 3 of the document notes how 'Borden Gates' is a possible strategic site if Simplyhealth and Sainsbury's land is surplus. It is noted that with some highway works, it could provide housing, offices and community facilities. Black Swan Yard car park is also mentioned as a potential mixed-use site (including housing), and this is a long-standing aspiration given that this is already an allocated mixed-use site (LE14). The Black Swan Yard development is already accounted for within the Council's five-year housing land supply trajectory, therefore is unlikely to yield any significant amounts of new housing development above and beyond what has already been accounted for.
- 3.38 At this stage therefore, the number of residential units that could potentially be delivered by the redevelopment of Andover Town Centre is unknown, and we reserve the right to comment on this matter at a later date. That said, it further reiterates the strong growth aspirations for Andover and the Council's continued commitment to deliver growth in this highly sustainable and desirable area.

### ***Housing Delivery Summary***

- 3.39 This section has demonstrated that Andover has seen substantial housing delivery in recent years, with commitments over and above those planned for in the adopted plan, with this delivery expected to continue in the next 5 years, a fact that is reflected in the strong 5-year supply position



put forward by the Council (who claim a 7.24 year supply in Northern Test Valley and 6.68 year supply for Southern Test Valley as of April 2019).

- 3.40 These accelerated delivery rates and extensions to large allocations also suggest a buoyant housing market area with strong demand for new build homes, both for existing residents and people moving to the area.
- 3.41 Delivery rates will have inevitably decreased as a result of COVID-19, particularly for the year 2020, as confirmed by both Taylor Wimpey and David Wilson Homes on their large allocated sites at East Anton and Picket Piece respectively. This will have an impact on the Council's trajectory and five-year supply position; albeit there are signs that the housebuilders and housing market as a whole is rebounding quite strongly post lockdown, so it may well be a short term issue, particularly in areas of high demand such as this.
- 3.42 However, it is more pertinent that the trajectory in the Local Plan shows a significant reduction in delivery towards the later years of the plan period (dropping from 724 in 2022/23 to 249 in 2024/25 onwards), and therefore even with COVID delays pushing some completions into later years to rebalance this slightly, this could leave the Council in a vulnerable position on five-year supply in the coming years unless additional housing land is identified.

#### **Local Education Capacity**

- 3.43 Given the substantial housing growth in Andover in recent years, and the potential for further significant growth over the emerging plan period, including the development of the land at Bere Hill; it is important to understand the level of capacity in existing schools to ascertain if any new provision may be required.
- 3.44 As such we have analysed the current capacity position in schools within 3 miles of the Bere Hill site, which covers the urban area of Andover and surrounding villages, and this analysis is attached at **Appendix 4** with the headline findings summarised below:
- Based on the average demographics for Test Valley a development of 700 dwellings is likely to generate a need for 146 primary school places and 94 secondary places; albeit the actual need for new places is likely to be much lower than this as many of those children moving to the site will be coming from other existing residential areas within Test Valley and will already have a place at a school in the area.
  - There are 17 primary schools within 3 miles of the site, with spare capacity of 665 places, suggesting that there is more than sufficient primary capacity to accommodate the proposed development at Bere Hill and wider future growth in Andover, without specific additional provision.
  - There are 3 secondary schools within 3 miles of the site, with spare capacity of 443 places, suggesting that there is more than sufficient secondary capacity to accommodate the



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proposed development at Bere Hill and wider future growth in Andover, without specific additional provision.

### **Summary and Conclusions**

- 3.45 This section has demonstrated that Andover is the key settlement within Test Valley and has been the major focus for growth in successive Local Plans, and this has resulted in housing delivery in excess of Local Plan targets in recent years suggesting a robust and dynamic housing market within the town with the capacity for further growth.
- 3.46 It is clear from the plans presented that growth has focussed towards the east of the settlement in recent years, with the East Anton, Picket Piece and Picket Twenty allocations comprising approximately 5,560 dwellings of committed development, with over 3,700 of these having already been delivered. We understand this distribution has been largely driven by a restriction on building above the 90m contour line within the Andover Bowl, which we address in more detail in the Development Framework at Appendix 1; as well as other local factors and constraints including the maintaining local gaps.
- 3.47 In spatial distribution terms, East Anton and Picket Piece are connected to the main urban area to the north west and west respectively. However, Picket Twenty is slightly disconnected from the settlement, with the separation actually provided by the Peel land at Bere Hill, alongside the adjacent Gallagher's and Council land.
- 3.48 In light of the Picket Twenty development to the east, and the containment provided by the A303 to the south, the Bere Hill land represents an obvious infill opportunity and the next logical location for growth in Andover.
- 3.49 This section has also confirmed that there is sufficient capacity in local schools (both primary and secondary) to accommodate the proposed development and wider future growth in Andover without additional dedicated provision.



#### 4. ECONOMIC GROWTH IN TEST VALLEY

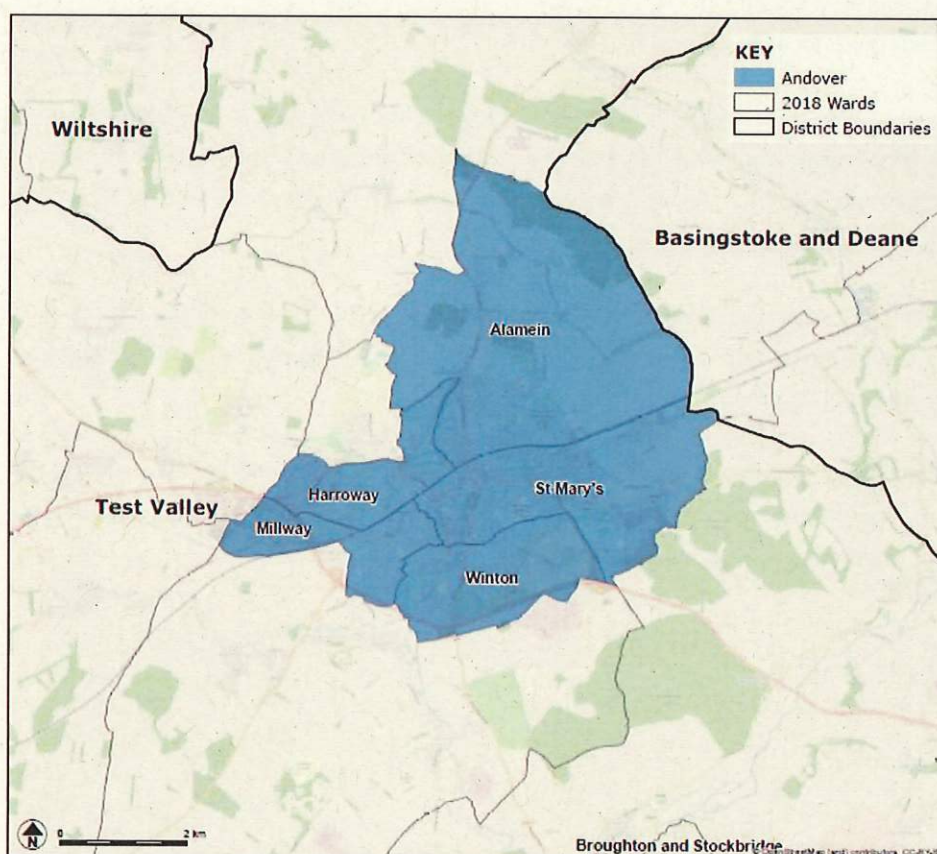
- 4.1 Before we consider the emerging development needs within Test Valley over the next 15 years, it is worth looking at past economic trends and seeing how these compare with the assumptions that underpin the adopted Local Plan, and the evidence base that supported it, including the 2013 SHMA.

##### **Employment Trends in Test Valley and Andover**

- 4.2 Data published by the Office for National Statistics (ONS) allow for analysis of past trends. However, as a result of changes to the methodology used in producing the data, it is not possible to look at trends over a continuous period, therefore the following timeframes have been analysed to allow for this fact: 2010-2015 and 2015-2018.

- 4.3 Figure 4.1 shows the five wards that make up Andover.

*Figure 4.1 - Andover Wards*



- 4.4 Between 2009 and 2015, Test Valley saw total employment increase by 9,000, representing annual growth of 2.7%. This was higher than the regional (South East) level of growth (1.2%), and national (Great Britain) trends (1.0%). Employment growth in Andover over the six years was lower than the District, but still high at 2.3% per annum (3,250 new jobs).



- 4.5 Between 2015 and 2018, employment in Test Valley remained flat at 60,000. Andover saw relatively modest growth of 0.3% per annum over this period, below national (1.1% growth p.a.) and regional (0.6% p.a.) trends. More positively, growth in Andover picked up from 2016-2018 and job numbers rose by 3.1% (1,500).

#### **Employment Growth Assumptions**

- 4.6 One of the main documents underpinning Test Valley's Local Plan is the 2013 Strategic Housing Market Assessment (SHMA)<sup>4</sup>, which provides long-term estimates of both housing need and demand between 2012 and 2031. On jobs growth, the SHMA projects an increase of 7,300 jobs in the District over the 19-year period (from 60,700 jobs in 2012, to 68,000 jobs in 2031). This represents annual growth of 0.6%.
- 4.7 As already noted, between 2009 and 2015 the annual employment growth in Test Valley was 2.8%, more than four times the projected growth rate in the SHMA. The rate decreases to 2.6% when looking at the time period from 2010 to 2015 and drops to 2.2% between 2011 and 2015, although this is still more than double the SHMA's projected growth rate. The annual employment rate increased considerably to 3.6% per annum between 2012-15. Each of the average annual rates of increase are considerably higher than the SHMA's employment growth scenario of 0.6% per annum.
- 4.8 Andover follows a similar trend to Test Valley in terms of employment growth rates from 2009-2015. The annual growth rate was 2.3% between 2009 and 2015, rising to 2.6% between 2010 and 2015. Between 2011 and 2015, annual jobs growth in Andover dropped slightly to 2.1%, before increasing to 3.2% between 2012 and 2015. Again, each of these annual growth rates are higher than the SHMA's annual employment growth target of 0.6%.
- 4.9 The strong jobs growth in Andover up to 2015 is highlighted in the Strategic Economic Plan of the Enterprise M3 Local Enterprise Partnership, which the area is part of. The SEP notes that Andover saw jobs growth of more than 20% between 2010 and 2015 – this is total growth, rather than the annual growth discussed above. The SEP also highlights the role that towns can play in a stronger economy and presents employment growth from 2010-15 for a number of towns that are in the LEP area. Andover's growth is significantly higher than any of the other towns, as shown in Figure 4.25.

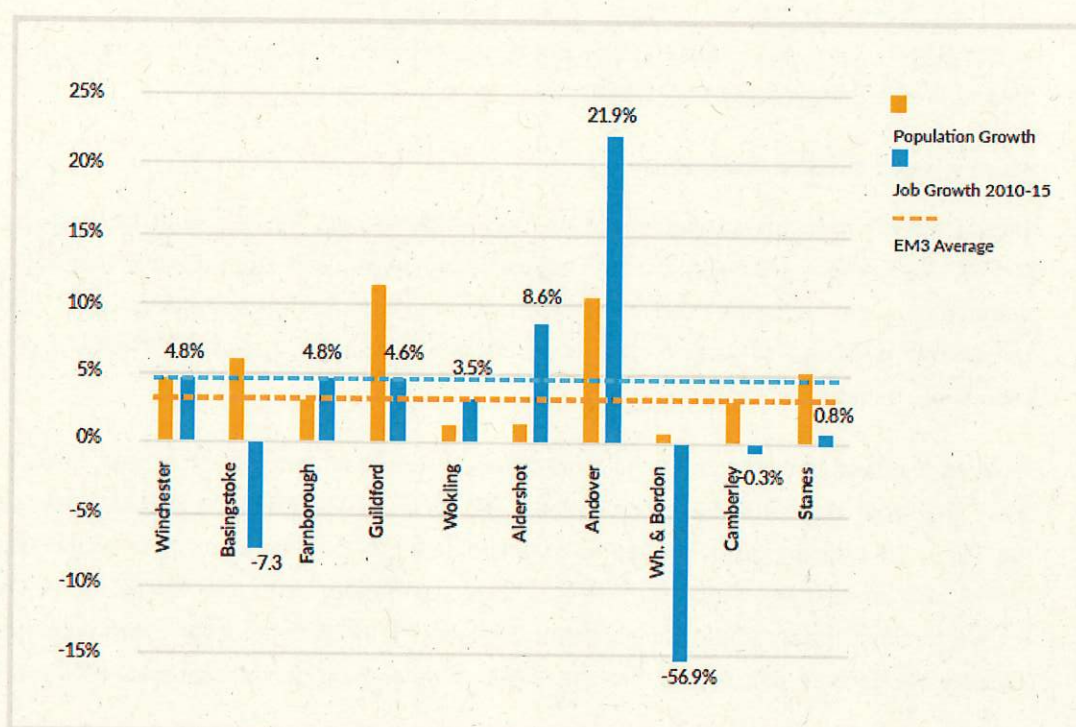
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<sup>4</sup> Test Valley Borough Council 2013 Strategic Housing Market Assessment: Justin Gardner Consulting, January 2014.

<sup>5</sup> The geographical definition of Andover may differ slightly in the Strategic Economic Plan.



*Figure 4.2 – Employment Growth in Towns within the Enterprise M3 LEP area, 2010-15*



Source: Enterprise M3 Strategic Economic Plan, 2018-2030

- 4.10 As already noted, jobs growth in Test Valley from 2015-2018 was flat, however employment has continued to increase in Andover. For the most recent timeframe of 2016-2018, the area saw total job numbers increase by 3.1% on an annual basis. Despite the fact that employment trends have been less positive in Test Valley since 2015, longer term trends would still seem to indicate that it is reasonable to expect jobs growth in the Borough to exceed 0.6% per annum over the next 15 years. Figure 4.3 shows the annual growth rates in Test Valley and Andover between 2009 and 2018.

*Figure 4.3 - Annual growth in jobs in Test Valley & Andover, 2009-2018*

	2009-15	2010-15	2011-15	2012-15	2015-18	2016-18
Test Valley	2.7%	2.5%	2.2%	3.6%	-	-
Andover	2.3%	2.6%	2.1%	3.2%	0.3%	3.1%

Source: ONS-Business Register & Employment Survey

- 4.11 If Test Valley continues to see faster levels of jobs growth than envisaged by the SHMA, this will put increased pressure on boosting housing supply. Without more new homes, there is a risk that Andover and Test Valley as a whole will have insufficient dwellings for people moving to the area for work.
- 4.12 Adding to the view outlined above is the government's consultation on reforms to the planning system, which includes changes to the standard method for calculating housing need. The Issues



and Options Paper notes that as it currently stands, housing requirements in Test Valley are around 550 dwellings per annum (dpa) when the standard method is applied. Under the government's proposed changes, this increases to 813 dpa. Further information on the amended standard method is provided in section 6, however the resulting uplift will be important in providing enough homes for people working in the area.



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## 5. VISION AND OBJECTIVES (CHAPTER 3) AND PLAN PERIOD (CHAPTER 4)

5.1 Paragraphs 3.4 discusses how the emerging Vision for the Local Plan will need to balance the ambition of the Council and the communities of Test Valley, as well as preserving those elements of our communities and environment that make Test Valley the place it is. Peel are entirely supportive of this, as it reflects the objective of Local Plans to deliver sustainable development (Paragraph 16 of 2019 NPPF).

5.2 Whilst no Vision is provided in the consultation document, it is important that when drafted, the Vision reflects paragraph 16 of the NPPF. That is, plans must be prepared positively, in a way that is aspirational but deliverable. One key Local Plan aspiration to help deliver a positively prepared plan should be to ensure that housing and employment needs are fully aligned, as highlighted in section 4, otherwise this could stunt the economy, lead to unsustainable commuting patterns and generate imbalances in the housing and labour market. Aligning housing and employment needs would help to achieve the overall aim to deliver sustainable forms of development.

### Plan Period

5.3 Paragraph 4.3 of the document confirms that the plan period for the next Local Plan is yet to be established, albeit notes how an end date of 2036 has previously been suggested.

5.4 Paragraph 22 of the NPPF notes how strategic policies should look ahead over a **minimum** 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities. The current LDS expects adoption of the Local Plan in Q3 2024, suggesting an end date of 2039 or beyond.

5.5 Paragraph 4.5 of the consultation document later notes how the plan period will be dependent upon a number of factors and how the Joint Statement of Common Ground in preparation by the Partnership for South Hampshire (PfsH) may potentially look forward to 2040, with a possible long term vision to 2050.

5.6 Peel are generally supportive of the potential idea for the Test Valley Plan Period to align with the PfsH timescales (up to 2040), as this will meet the 15 year forward planning requirements of NPPF paragraph 22, whilst also allowing collaboration in the Local Plan making process across the wider PfsH area. The PfsH is a partnership of eleven local authorities around the Solent under an arrangement which aims to improve the economic performance of the wider South Hampshire sub-region (it was previously known as PUSH but rebranded in June 2019). The PfsH recognises that to be truly successful, economic development, skills and housing issues cut across the boundaries of individual local planning authorities.

5.7 NPPF paragraph 24 outlines the duty to cooperate requirement, with paragraph 26 later noting how effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular,



joint working can help to determine whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.

- 5.8 The importance of collaborative working in the plan making process is clearly evident in the preparation of positively prepared and effective plans, therefore we recommend that the Test Valley Plan Period carefully considers alignment with wider PfSH timescales (and end date of 2040) to align with the NPPF (paragraphs 22, 24 and 26), providing this would not lead to unnecessarily delay in the plan preparation process and adoption.



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## 6. LIVING IN TEST VALLEY/ HOUSING POLICIES (CHAPTER 5)

### Housing Requirement

- 6.1 As noted in section 4, the current standard methodology figure for Test Valley stands at around 550 dpa (it's actually **556 dpa**), which is a slight reduction on the 588 dpa figure in the adopted plan.
- 6.2 However the government recently launched a consultation on changes to the standard method, which introduces an element of growth based on existing stock, and increased affordability uplifts, which leads to significant increases in several local authorities, including Test Valley, where the indicative figure is **813 dpa**, an increase of **46%** from the current SM (and 38% from the adopted plan figure).
- 6.3 It also generates a total need figure of 9,272 dpa across Hampshire which is 13.2% higher than the current method (8,193 dpa) and **7,675 dpa** across the 11 PFSH authorities which is **14.8%** higher than the current method (6,687 dpa).
- 6.4 Now, it is acknowledged that this new method is yet to be adopted and may be subject to some change; however it is highly unlikely to reduce significantly given it meets the government's national target of 300,000 homes and could come into force relatively quickly after the consultation period (which closes on 1<sup>st</sup> October), as it simply requires an update to the PPG, rather than any formal legislative change.
- 6.5 Accordingly, it is our strong view that the Council need to plan for a figure of 800 dpa + which will require significant additional allocations, and may also need to consider unmet need within the wider PFSH area which is also likely to rise by 10-15%.
- 6.6 Even under the current standard method regime, it is our view that there are exceptional circumstances that would support an elevated housing target above 556 dpa.
- 6.7 Paragraph 2a-010-20190220 of the PPG sets out the circumstances when it might be appropriate to plan for a higher housing need than the standard method indicates, including where there are growth strategies for the area, strategic infrastructure improvements, where an authority has agreed to take on unmet need from neighbouring authorities, or where previous levels of housing delivery or assessments of need are significantly greater than the standard method. We address each of these in turn below.

### *Growth Strategies & Strategic Infrastructure Improvements*

- 6.8 Test Valley is within the 'Enterprise M3' Local Enterprise Partnership (LEP) which formed in 2011 and covers the M3 corridor across West Surrey and much of Hampshire. Since 2014 the LEP has secured over £240m in government funding from various 'Growth Deals' to deliver its Strategic Economic Plan (SEP), published in 2014 and updated 2018. The latest 2018 SEP specifically



highlights the need to accelerate the supply of new homes to help deliver economic aspirations. (page 14).

- 6.9 Much of the early investment secured by the SEP was focussed around major transport projects in the wider LEP area (outside Test Valley), but since then it has been more focussed on innovation and skills throughout the area. As part of this, Andover has been identified as a 'Step up Town', defined as an area of latent economic potential requiring intervention to remove barriers to growth, and allocated a Growth Package including a series of catalytic transport and infrastructure measures to alleviate congestion and enhance capacity and town centre renewal to promote inward investment, skills centres of excellence and interventions to unlock housing sites. Progress to date includes the development of the Andover Skills and Technology Centre and elevated housing delivery in recent years as set out in detail in section 3.
- 6.10 It is also pertinent that the PfSH authorities which Test Valley is seeking to collaborate with form part of the Solent LEP area, which has itself received 'Growth Deal' funding of £183m since 2014 and has invested in a number of strategic infrastructure projects. Accordingly, this clearly demonstrates that there are ambitious growth strategies and strategic infrastructure improvements in this location that could support an elevated level of housing growth to that set out in the current standard methodology.

#### ***Unmet need in adjacent authorities***

Given Test Valley's intention to collaborate on a joint evidence base with the eleven adjacent PfSH authorities, then it will also need to consider unmet need generated in this area, which is a distinct possibility given the number of authorities involved and the high levels of historic need and known environmental and transport constraints in South Hampshire<sup>6</sup>. This position is likely to be exacerbated if the new method is adopted given it sees an increase of 14.8% (988 dpa) across the PfSH area.

#### ***Previous delivery***

Figure 6.1 below sets out housing completions in Test Valley between 2014/15 and 2018/19. This shows that annual completions have significantly exceeded the current standard method figure by a total of 1,597 dwellings across the 5 years (and the adopted target of 588 dpa by 1,437 across the 5 years), indicating the actual need far outstrips the standard method figure.

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<sup>6</sup> As noted in paragraph 1.4 of the PUSH Position Statement – June 2016: <https://www.push.gov.uk/wp-content/uploads/2018/05/7-June-JC-Spatial-Strategy.pdf>



*Figure 6.1 – Housing Delivery in Test Valley 2014-2019*

Year	Completions			Current Standard Method Figure	Over-Delivery against Current Standard Method Figure
	North	South	Total		
2014/15	668	212	880	556	324
2015/16	666	338	1,004	556	448
2016/17	651	240	891	556	335
2017/18	599	194	793	556	237
2018/19	560	249	809	556	253
<b>TOTAL</b>	<b>3,144</b>	<b>1,233</b>	<b>4,377</b>	<b>2,780</b>	<b>1,597</b>

### Housing Market Areas

- 6.11 Paragraph 5.11 confirms how the currently adopted housing requirement in the Local Plan is sub-divided between two housing market areas (HMA)- Southern Test Valley (STV) and Northern Test Valley (NTV). Paragraph 5.12 later notes how the majority of responses to the Issues and Options consultation supported the separate HMAs being maintained, but that they should be reviewed- including the details of their boundaries. As part of the Council's evidence base, further research into the issues of HMAs will be undertaken. The consultation paper then sets out a number of potential options to consider for future HMAs, which we answer below.

***Q1: Should (a) we maintain the two existing HMAs, but perhaps with a revised boundary between them, such as enlarging the area within STV HMA. If so, what additional area(s) of the Borough should be included within STV HMA? Alternatively, (b) should a single HMA for the whole of Test Valley be used? Or (c) should additional HMAs be created, increasing the number to 3 or 4, with the additional HMA(s) applying to the rural area?***

***Q2: In determining HMAs how should wider relationships with settlements beyond the Borough's boundaries, be taken into account, including with Southampton, Salisbury and Winchester?***

***Q3: Should an alternative approach to using parish boundaries be used for HMAs? If so, would this be easily be identifiable and practical for monitoring purposes?***

- 6.12 At the outset it must be noted that the PPG no longer includes any guidance on how to define HMAs<sup>7</sup>, as housing need is generally expected to be calculated at the local authority level using the standard methodology, so this becomes an issue of addressing housing distribution within a local authority area, rather than in setting the overall target.
- 6.13 In respect of distribution within Test Valley we support the continued use of the two HMAs as set out in the 2013 SHMA, on the basis that the two HMAs serve very distinct housing needs over distinct geographic areas, with the NTV HMA having stronger links with the Basingstoke market

<sup>7</sup> It used to be included under para 2a-011-20140306 – and recommended consideration of household migration and search patterns (levels of containment); house prices and rates of change; and contextual data.



area and the STV HMA having stronger links with the Southampton area. We have seen no further evidence to support a departure from this.

- 6.14 It is clear that the current demarcation has supported the NTV HMA and Andover in particular, in delivering much higher housing numbers than the STV HMA, reflecting the buoyant housing market in this part of the borough. For this reason, at face value and in the absence of detailed evidence, it would seem counter-intuitive to reduce the size of the NTV HMA by enlarging the STV HMA.
- 6.15 In terms of potential revised boundaries, it is notable that the existing HMA boundaries were considered appropriate in the 2013 SHMA and endorsed by the Inspector in their January 2016 report for the currently adopted Local Plan. We have not seen any more up to date evidence confirming the HMAs level of containment or other important factors, therefore at this stage cannot provide detailed comments on any potential amendments to their boundaries.
- 6.16 Peel are supportive of an evidence base review on this to inform distribution, and reserve the right to provide further comments once evidence has been produced.
- 6.17 In respect of relationships with wider settlements, we note the intention to collaborate on a joint evidence base with the other PFSH authorities which includes Southampton and Winchester, which should highlight any relevant housing market crossover or other relationships with these towns.
- 6.18 It is unclear if any similar collaboration or discussions are taking place with Wiltshire in respect of Salisbury, but we would welcome such discussions and the opportunity to review any related evidence produced on this matter.

## **Housing Distribution**

### ***Andover***

- 6.19 Paragraph 5.17 of the consultation document notes how as the largest settlement in the Borough, with the widest range and number of facilities, Andover has been the major focus of recent development. It is then noted how the scale of future growth will be considered and a range of sites will be considered, including the potential for housing to be delivered as part of the redevelopment of the Town Centre through the masterplan.
- 6.20 At the outset, we would like to reiterate our earlier comments from Section 3 that it is clear that Andover is not only a highly sustainable settlement as acknowledged by the Council, but also has a very strong housing market that has the ability to deliver houses quickly. Andover's strategic allocations have had high levels of completions in recent years, leading to a healthy five-year land supply position in recent years as required by paragraph 73 of the NPPF. This strong supply position has reduced the risk and likelihood of unplanned development in other areas across the Borough.
- 6.21 Andover's high level of sustainability and strong housing market (helped partly due to its direct train service into London Waterloo) ensure that it should remain at the top of the settlement



hierarchy and receive the highest levels of growth with the NTV area. Planned development in Andover, through additional strategic allocations like Bere Hill, would be entirely sustainable and help to deliver an effective, positively prepared and justified plan.

- 6.22 Finally, we note the reference made to potential housing being delivered as part of the redevelopment of Andover Town Centre. As explained in Section 3 we reserve the right to comment on this matter at a later date when more details are known; however as acknowledged by the Council there will be a need to deliver a mixture of sites in order to meet emerging housing requirements, including the need to allocate suitable strategic sites such as Bere Hill. Windfall development and development within Andover's existing settlement boundary alone will not be sufficient to meet emerging housing requirements; indeed the only allocation there currently at Black Swan Yard is for 100 dwellings and has yet to secure consent, suggesting the local market or town centre/ apartment style development may not be as strong.

### **Settlement Hierarchy**

- 6.23 Paragraph 5.24 notes how the emerging Local Plan will review the existing settlement hierarchy, including a review of services and facilities within each settlement to inform the new settlement hierarchy. The Paper then goes on to pose a series of questions as outlined below.

***Q4: Should the number steps of the settlement hierarchy be increased, for example by sub-dividing the 'rural villages' into two separate tiers?***

- 6.24 Peel do not have any particular comments on this matter at this stage, albeit reserve the right to comment at a later date once the evidence base in relation to the settlement hierarchy has been published.

***Q5: How should we decide which settlements to include within each step of the settlement hierarchy?***

- 6.25 This should be decided by a combination of factors-including existing services and facilities within a settlement, housing market conditions, past delivery rates and land constraints and availability. As explained earlier, Andover should remain at the top of the settlement hierarchy, as it benefits from a variety of local services and facilities (with recent allocations adding to the service offer) and a strong housing market with high delivery rates.

***Q6: Should we consider groups of rural settlements together, where these are closely related to each other and/or share facilities and services?***

- 6.26 Peel do not have any comments to make on this matter.

***Q7: How should we treat rural settlements which are close to other larger settlements and can therefore also easily access their facilities and services?***

- 6.27 Peel do not have any comments to make on this matter.



## Settlement Boundaries

### ***Q8: In updating the settlement boundaries to reflect recent development which has built and development with planning permission, should we also include new allocations?***

- 6.28 Yes, when updating settlement boundaries as part of the emerging Local Plan, there will be a need to include new allocations in order to meet emerging housing requirements. This will include suitable and sustainable sites such as Bere Hill, which should be included within Andover's new settlement boundary.
- 6.29 However, the Council will also need to consider the proposed changes put forward in the recently published Government's Planning for the future White Paper (August 2020). Whilst only draft at this stage with consultation due to end in October 2020, if taken forward, the changes could be introduced through a Written Ministerial Statement in Autumn this The White Paper proposes a number of significant changes to the existing Local Plan making process, including the potential introduction of a zoning system which introduces three types of land-Growth areas suitable for substantial development, renewal areas suitable for some development, and protected areas where development is restricted.
- 6.30 The White Paper explains how the growth areas suitable for substantial growth category would include land suitable for comprehensive development- including new settlements and urban extension sites. Sites in this category would have outline approval for development. Bere Hill would fall under this category, as it is a highly sustainable and suitable site which represents a logical urban extension to Andover.
- 6.31 Renewal areas cover existing built areas where smaller scale development is appropriate, including development in town centres. There would be a statutory presumption in favour of sustainable development being granted for the uses specified as being suitable in each area.
- 6.32 The final category is areas that are protected - this would include areas such as Green Belt, AONB and areas of open countryside outside of land in growth or renewal areas. These areas, as a result of their particular environmental and/or cultural characteristics, would justify more stringent development controls to ensure sustainability.
- 6.33 Regardless of whether these proposed changes come into force, there is a compelling need for the Council to allocate more sites as part of the next Local Plan. This will include suitable sites such as Bere Hill, which should be allocated for residential development or as a growth area suitable for substantial development.

### ***Q9: How should we define settlement boundaries? What type of land uses should be included, such as public open space?***

- 6.34 Settlement boundaries should be defined to include existing planning commitments and new site allocations (under current planning system guidance). Other supporting land uses such as public open space should also be included to meet local needs.



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***Q10: Should the approach to using whole curtilages for defining settlement boundaries be retained, or should we take account of physical boundaries which extend beyond curtilages, or limit settlement boundaries to only parts of curtilages?***

- 6.35 Peel do not have any comments to make on this matter.

***Q11: Should settlement boundaries be draw more tightly or more loosely, and perhaps reflecting which tier settlement is within the settlement hierarchy?***

- 6.36 Peel reserve the right to comment on this matter at a later date, once detailed proposals relating to settlement boundary changes are published. There is logic in drawing up looser defined settlement boundaries to allow for higher levels of growth in areas that are suitable, albeit clearly this would be a very case specific matter to the characteristics and constraints of a particular location. The alternative is to provide flexibly worded policies to allow growth directly adjacent to existing settlement boundaries where there is a need, and other policy requirements can be met.

***Q12: Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment?***

- 6.37 Yes, this would be in line with the pro-growth agenda of the NPPF, as well as the sentiment expressed in the August 2020 Planning for the Future White Paper.

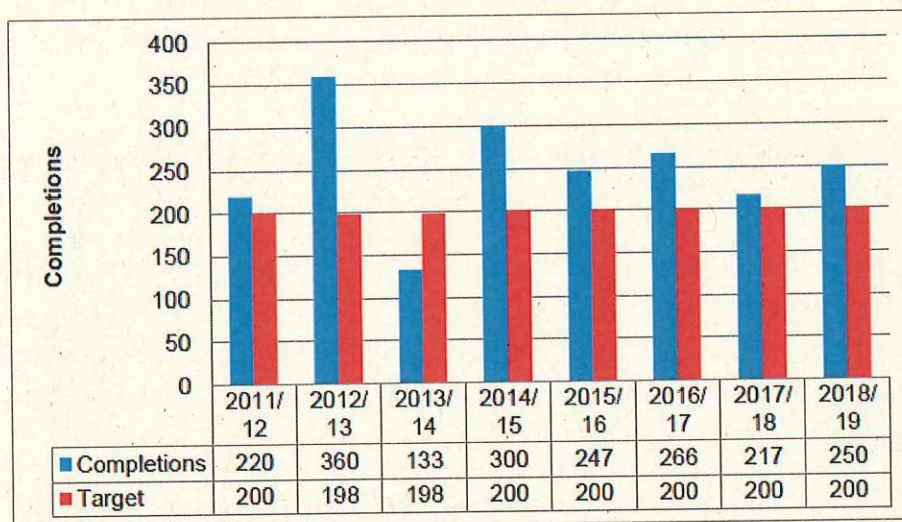
#### **Housing Mix and Affordable Housing**

- 6.38 Paragraphs 5.30 - 5.31 of the consultation document notes how as part of the evidence base for the next Local Plan, the Council will commission a new Strategic Housing Market Assessment (SHMA) to assess the need for affordable housing and housing for particular needs (such as elderly). Peel fully support this updated evidence base being produced, as it is important that any prescriptive affordable requirement should be based on up to date evidence and should be subject to detailed viability testing at a range of scenarios. We reserve the right to comment on this updated evidence, and the future affordable housing requirement, at a later date when further details are known.
- 6.39 In respect of existing affordable housing delivery, the 2019 Annual Monitoring Report (AMR) (paras 10.14 – 10.16) confirms that this has been strong since the current plan period began in 2011, exceeding the 200 dpa target (approximately 35% of the adopted requirement) in every year other than 2013/2014 with overall delivery across 8 years at 125% (1,993 dwellings delivered compared to a requirement of 1,596). Figure 2 from the AMR illustrates this and is set out over the page.



*Figure 6.2 – Test Valley Affordable Completions 2011-2019*

**Figure 2: Affordable Housing Completions (2011-2019)**



6.40 It is acknowledged that much of this delivery has come from the large allocations at East Anton, Picket Piece and Picket Twenty in Andover; suggesting that further large allocations will be required to maintain this high level of delivery.

6.41 Paragraph 5.32 notes how the SHMA will also assess the size, type and mix of housing to meet local needs within different areas of the Borough. This is in line with NPPF Paragraph 61, which states that a mixture of house types and sizes should be reflected in planning policies. To allow for flexibility in sites coming forward, Peel would not advocate a prescriptive housing mix policy being introduced. Any such policy would need to be justified by evidence which confirms a particular need and should also be considered in terms of viability implications.

6.42 Paragraph 5.35 later notes how the Council will also consider whether the next Local Plan should include a policy on internal space standards and accessibility standards for new housing. We repeat the comments made in our 2018 Representations that any introduction of internal space standards needs to be fully justified by a robust evidence base. These are optional standards and as outlined in the NPPG (Paragraph: 020 Reference ID: 56-020-20150327), local planning authorities must demonstrate need and should take account of the following areas:

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings*



*on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*

- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.*

6.43 There is no suggestion from the existing evidence base to suggest substandard room sizes are an issue in Test Valley, so we would suggest this is unnecessary at this stage.

6.44 In terms of accessibility standards, Peel fully support the provision of housing for older people and accept that there is a need for such housing in Andover. As with the space standards, the NPPG introduced optional standards for wheelchair accessibility within the Housing Technical Standards, in line with Building Reg requirements; however, these can only be applied if evidence is gathered on the following<sup>8</sup>:

- *the likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*
- *the accessibility and adaptability of existing housing stock.*
- *how needs vary across different housing tenures.*
- *the overall impact on viability.*

6.45 The updated SHMA will need to consider the above and whether to seek the optional standard.

6.46 One thing to reiterate is that evidence of an elderly population does not necessarily translate through to a requirement for adaptable dwellings, as many will prefer to adapt their existing home; whilst others will choose to move to dedicated and specialised extra care facilities.

6.47 In addition, the added costs for building adaptable homes are often underestimated and can seriously undermine viability in certain locations.

### **Self-Build and Custom Build Housing**

#### ***Question 13: Should we have a specific policy for self-build homes?***

6.48 As outlined in footnote 26 of the NPPF, 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 build housing. As the Government are looking to encourage self-build, a policy should be included which encourages

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<sup>8</sup> Paragraph: 007 Reference ID: 56-007-20150327



the development of self-build plots. However, as we explain below, this should not be turned into a policy requirement to deliver on allocated sites.

***Q14: Should we have a policy for large housing sites to include a proportion of serviced plots to be made available for sale to those seeking to build their own homes?***

- 6.49 No, Peel would not be supportive of the idea for large housing sites to include a proportion of serviced plots. Firstly, any such requirement would need to be supported by evidence suggesting strong demand for self-build plots. This data has not been published, however at the September 2018 consultation it was noted how there was very limited demand at that time.
- 6.50 Secondly, the provision of self-build plots can act as an impediment to the delivery of large sites. It can delay housing delivery and if there is limited demand for self-build plots, the space used for them would be better occupied by market or affordable housing which is required.
- 6.51 We would recommend that specific sites are identified and allocated in the Local Plan for self-build plots, subject to their being evidenced demand for such development within the Test Valley.

***Q15: Should self-build housing be delivered as part of community led development?***

- 6.52 Peel do not have any particular comments on this, albeit it is noted that there would be clear benefits for self-build housing to be community led. The Local community will be able to identify any demand and suggest appropriate locations where self-build plots could be delivered in the local area.

***Q16: Could the introduction of a self-build housing policy also be an opportunity for the council to tackle the issue of climate change?***

- 6.53 Peel do not have any detailed comments to make on this matter.



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## **7. WORKING IN TEST VALLEY/ EMPLOYMENT POLICIES (CHAPTER 6)**

### **Town Centres and Retail**

- 7.1 The document discusses the importance of regenerating the Borough's Town Centres and retail offer, which Peel fully support.
- 7.2 Of particular note is paragraph 6.5, which states that increasing the number of homes in the centre of towns is an important component of regeneration. It is then stated that the master-planning exercise for Andover town centre will likely introduce some new homes. Again, Peel are supportive of this and would like to comment on any potential urban capacity for homes to be delivered in Andover Town Centre once further detail is known.

### **Tourism**

#### ***Q17: Should a revised tourism policy be more flexible for potential new tourist attractions***

- 7.3 Peel do not have any comments to make on this matter.

#### ***Q18: Should a revised tourism policy be more supportive of innovative proposals?***

- 7.4 Peel do not have any comments to make on this matter.

### **Local Economy and Employment**

- 7.5 We do not have any particular comments to make on this matter further to our comments outlined in Sections 3 and 4 relating to economic growth in Test Valley. We would reiterate that economic growth aspirations should be fully aligned with housing growth, as the two are very much inter-related, and this has not necessarily been the case in the past with the actual economic growth rate far outstripping what has been planned for in the adopted Local Plan.



## **8. ENJOYING TEST VALLEY/ ENVIRONMENTAL POLICIES (CHAPTER 7)**

### **Landscape**

- 8.1 Peel do not have any particular comments to make on this topic at this stage.

### **Design**

- 8.2 Paragraph 7.9 of the consultation document outlines how during the earlier Issues and Options consultation, a range of comments were received regarding how design policies should be dealt with. Comments including options on strong policies but that they should not be too prescriptive, taking account of guidance within town and village design statements and considering using design codes. The Council are now considering a number of options going forward.
- 8.3 Peel are fully aware of the importance of high-quality design in new development proposals and would be supportive of design policies encouraging in this. Any design policies should allow for flexibility and consideration of individual site characteristics.
- 8.4 We note the White Paper's prioritisation of design as set out in "Pillar Two - Planning for beautiful and sustainable places". They hope to deliver this through a 'National Model Design Code' based on last year's National Design Guide, to be published later this year (alongside an updated Manual for Streets), which will then be used as a template for establishing site specific design codes or 'pattern books' in Growth Areas as part of the permission in principle process.
- 8.5 Peel are supportive of this aspiration in principle, but would stress that such Design Codes would need to be agreed at the Local Plan stage, and considered at the earliest possible stage in that process, to give developers both the certainty and time to develop detailed proposals, and the ability to engage and influence this process to ensure deliverability. Agreement at the outset, will also avoid further supplementary Local Plan processes to establish Masterplans/ SPDs etc, as these inevitably lead to delays in delivery. They will also need to include a level of flexibility and a review mechanism, should there be a change in circumstances, local vernacular, viability or national policy.
- 8.6 Paragraphs 7.11-7.12 discuss the responses received relating to housing density standards. Peel's view is that in line with the Government's pro-growth agenda, minimum housing density standards can be a useful tool, but that these need to be flexible and responsive to the particular site context. In line with NPPF paragraph 123 part b) the use of minimum density standards could be considered across the plan area, however it may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range.
- 8.7 This is endorsed in the White Paper which highlights the need for both high densities where possible but also for more *"gentle densities in and around town centres and high streets, on brownfield land and near existing infrastructure so that families can meet their aspirations."*



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### **Local Gaps**

- 8.8 Peel do not have any comments to make on this matter.

### **Local Green Space**

- 8.9 Paragraph 7.18 notes how there were mixed views in the last Issues and Options consultation as to whether Neighbourhood Plans or Local Plans should designate Local Green Space. The Council will investigate further how best to approach this in the local plan.
- 8.10 At this stage, Peel do not have any detailed comments to make, albeit reserve the right to do so once any updated evidence base is published. Peel are aware that there are often conflicting policy aims between Neighbourhood Plans and Local Plans, where Neighbourhood Plans look to designate local green spaces where there has been no demonstrated need for such a designation at the local authority (Local Plan) level. Peel emphasise the importance for the two to work alongside each other, as there are sometimes conflicts which can lead to delays or issues with Local Plan allocated sites coming forward because of Neighbourhood Plan local green space designations. Such conflicts can undermine the Local Plan being effective in delivering housing requirements.
- 8.11 In respect of the Bere Hill site, we note that the latest masterplan shows a large area of open space/ parkland along the northern boundary of the site with footpaths and landscaping throughout, with direct links to the existing footpath network including Ladies Walk, thus providing the opportunity to create a new local green space for Andover, which can serve both existing and future communities. This local green space was informed by the Landscape Framework Plan and supporting analysis which is summarised in page 21 of the Development Framework at Appendix 1 and set out in more detail within section 7/ page 14 of the Landscape Statement at Appendix 2.

### **Historic Environment**

- 8.12 Paragraph 7.22 of the Consultation Paper notes how as part of updating evidence in relation to the historic environment, the Council has commissioned a review of the conservation areas for Romsey and Andover. As the details of the review are yet to be published, Peel reserve the right to comment on the findings of the Andover Conservation Area review at a later date.

### **Sustainable Construction and Renewable Energy**

- 8.13 Peel are fully supportive of energy efficiency in new developments, however, reiterate the Council's comments at paragraph 7.29, which notes how the Government has recently undertaken a consultation about increasing energy performance standards for new homes through Building Regulations. If implemented, then Building Regulations would likely remain the appropriate mechanism to address sustainable construction and energy standards (as it is currently).
- 8.14 It is considered that Building Regulations are the most appropriate mechanism to deal with these matters and Peel would not advocate the introduction of local optional standards in the Borough; unless these are supported by a robust evidence base demonstrating need.



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### **Biodiversity**

- 8.15 Paragraph 7.33 notes how the Government has published proposals to require new development to achieve a net gain in biodiversity. More detail is to follow in relation to how this will be implemented, and Test Valley will take this into account through the preparation of the next Local Plan.
- 8.16 Peel are wholly supportive of protecting and enhancing biodiversity as part of development proposals. However, any future policy on biodiversity net gain should include flexible wording such as 'where possible', as each individual site is to be assessed on its own merits and on some sites, it may be difficult to deliver a net gain in biodiversity. It is therefore important to have flexible wording incorporated into policy, to allow for a route forward on sites which may be perfectly sustainable and suitable for development in all other regards.
- 8.17 Where net gain is not achievable on-site, the Council will need to find alternative sites and projects where biodiversity improvements can be made, such that applicants can off-set their impacts through financial contributions. It is suggested that such schemes are secured and costed at the earliest possible time, to provide accurate financial obligations for applicants that meet the relevant CIL tests.

### **Public Open Space and Green Infrastructure**

- 8.18 We would reiterate our comments from our earlier Issues and Options Representations that any open space requirements in new developments must be based on up to date evidence of need. Specific open space requirements (i.e. for outdoor sports etc.) should be based on the needs set out within the Playing Pitch Strategy and met within the local area wherever practicable, while more general public open space requirements can be met through a standard per dwelling or hectare requirement, as long as this has flexibility built in depending on the nature of the site.
- 8.19 Paragraph 7.39 notes how some local authorities are looking at opportunities to use planning policies to go beyond maintaining existing levels of tree cover to ideally secure increased tree coverage within their local area. One way of doing this is to specify a certain proportion of a site that should be covered by tree canopy, including through retaining existing trees and/or planting additional trees. Peel are supportive of this concept, however, again, flexible wording must be included into any policy which was looking to introduce this and should not be overly prescriptive. Maintenance and viability considerations need to be carefully considered and not every site would be able to practically deliver additional trees on site. Any new policy should also be supported by robust evidence to demonstrate there is a need for such an approach to development.

### **Water Supply and Quality**

- 8.20 We reiterate our earlier comments to the Issues and Options Consultation that if the Council are looking to introduce water efficiency standards, these need to be supported by a robust evidence



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base. Local planning authorities must establish a clear need based on (NPPG Paragraph:015 Reference ID: 56-015-20150327):

- *existing sources of evidence.*
- *consultations with the local water and sewerage company, the Environment Agency and catchment partnerships. See paragraph 003 of the water supply guidance*
- *consideration of the impact on viability and housing supply of such a requirement.*

#### **Air Quality**

8.21 Peel do not have any comments to make at this stage.



## **9. INFRASTRUCTURE IN TEST VALLEY (CHAPTER 8)**

### **Transport, Communications and Movement**

9.1 Peel do not have any particular comments at this stage.

#### **Sustainable Transport**

##### ***Cycling and Walking***

9.2 Peel do not have any particular comments at this stage.

##### ***Public Transport***

9.3 Peel do not have any particular comments at this stage.

#### **Car Parking**

9.4 Paragraph 8.15 notes how the next Local Plan will include a review of current parking standards for different types of developments at different locations in the Borough. In this regard, we highlight the importance of paragraph 105 of the NPPF, which requires local parking standards to take account of:

- a) the accessibility of the development;*
- b) the type, mix and use of development;*
- c) the availability of and opportunities for public transport;*
- d) local car ownership levels; and*
- e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*

9.5 We would also highlight paragraph 106 of the revised NPPF which confirms that maximum parking standards should only be used where there is clear and compelling justification.

#### **Electric Vehicle Charging**

9.6 Peel are supportive of the move towards low/zero emission transport modes. The only comment we make is that if the Council are looking to introduce any electric vehicle charging parking standards, this must be justified by a robust evidence base. It must also be subject to viability testing and fully consider viability matters.

#### **Health**

9.7 Peel do not have any comments at this stage, albeit reserve the right to comment on the future Infrastructure Delivery Plan (IDP) which will include health infrastructure requirements.



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**Education**

- 9.8 No comments to make at this stage.

**Utilities**

- 9.9 No comments to make at this stage, albeit reserve the right to do so when further details published.

**Telecommunications**

- 9.10 No comments to make at this stage.

**Community Infrastructure Levy (CIL)**

- 9.11 Peel reserve the right to comment on any changes to the CIL charging schedule once these details are known.
- 9.12 It is also important to take note of the proposed changes to CIL in the Government's August 2020 White Paper (Planning for the Future) which is currently subject to consultation. As part of the proposals, CIL and the current system of planning obligations will be reformed as a nationally set, value-based flat rate charge. This would be either a single rate or at area-specific rates. Clearly if these proposals are taken forward into a reformed planning system through a Ministerial Statement, this would impact on how local authorities are currently operating CIL.



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## 10. CONCLUSIONS

- 10.1 This representation has demonstrated that the Bere Hill Farm site is an available, suitable and deliverable site which forms an obvious infill opportunity to the south east of Andover, given it is surrounded by existing development and the A303 Andover bypass. Full details of the site are contained in the Development Framework at **Appendix 1**, which is supported by detailed technical work on Landscape and Ecology matters contained in **Appendices 2 & 3**.
- 10.2 We also confirm that Peel have the ability to open up sites ensuring immediate delivery themselves through their new housebuilding arm, Northstone, working with partners thus providing guaranteed end users for the site if required, which further boosts the deliverability credentials of the site. This could also allow Peel to partner up with Registered Providers at the outset, if required, to ensure delivery of the required levels of affordable housing.
- 10.3 It has also shown how Andover is the primary settlement within Test Valley with the capacity for significant further growth, whilst additional economic analysis has shown that jobs growth in Test Valley is exceeding that planned for in the adopted Local Plan; with Andover in particular registering a higher rate of jobs growth between 2010 and 2015 than any other town in the whole LEP area which covers much of Hampshire and West Surrey.
- 10.4 This suggests that the housing requirement within the emerging plan should be increased to align with this level of jobs growth, which exceeds the current standard methodology and adopted requirement.
- 10.5 However, the government have already recognised limitations with the current methodology and are currently consulting on a revised method to boost housing delivery across the country, with the current calculation generating a need of 813 dpa in Test Valley, an increase of 46% from the current standard method figure and 38% from the adopted plan figure. This has also led to an increase of 15% across the wider South Hampshire (PfSH) sub region which could have implications on Test Valley in terms of meeting unmet need.
- 10.6 Whilst the new methodology has not yet come into force, we suggest that the Council will need to start planning for this level of need as it is likely to be adopted soon and unlikely to change significantly.
- 10.7 This will require significant additional housing allocations across Test Valley.
- 10.8 In terms of the distribution of the emerging housing requirement, it is our view that growth should be focussed on allocations in the existing main settlements such as Andover, as this is clearly the most sustainable location, with a large Town Centre, access to the national rail network, and a good range of local schools with capacity for growth (as assessed in Appendix 4). Historic evidence also suggests that large allocations within the main settlements provide the best opportunity for maintaining high levels affordable delivery.



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- 10.9 Within Andover, the Bere Hill Farm site (and adjacent land) becomes the next obvious choice for allocation, given it scores reasonably well in the sustainability appraisal due to its direct connections with the Town Centre and containment by existing development and the A303.
- 10.10 Whilst there have been historic issues raised around the topography of the site in respect of the Andover Bowl, a comprehensive landscape and visual analysis has demonstrated that the development of this site is entirely acceptable from a landscape perspective, subject to sensitive masterplanning and landscaping as incorporated into the current masterplan.
- 10.11 In light of the above, we respectfully request that the Council considers this site for allocation in the emerging Local Plan and ensure the site is objectively assessed in any future evidence base review accordingly.



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## **APPENDIX 1 – SUMMARY DEVELOPMENT FRAMEWORK**



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## **APPENDIX 2 – LANDSCAPE STATEMENT**



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**APPENDIX 3 – PRELIMINARY ECOLOGICAL ASSESSMENT**



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## **APPENDIX 4 – LOCAL EDUCATION CAPACITY**