

# Test Valley Borough Council Next Local Plan - Refined Issues and Options Consultation

## COMMENTS FORM

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

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

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

Once the form has been completed, please send to

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

### Contacting us

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

Tel: 01264 368000

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

## Part A: Your Details

Please fill in all boxes marked with an \*

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

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

Email Address*	
----------------	--

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:

--

### 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
Question 1	<p><i>Question 1 asks whether:</i></p> <p><i>a) should the Council maintain the two existing Housing Market Areas (HMAs), but perhaps with a revised boundary between them such as enlarging the area within Southern Test Valley (STV) HMA. If so, what additional area(s) should be included within the STV HMA?</i></p> <p><i>Alternatively,</i></p> <p><i>b) should a single HMA for the whole of Test Valley be used? or</i></p> <p><i>c) should additional HMAs be created, increasing the number to 3 or 4, with the additional HMA(s) applying to the rural area?</i></p> <p>In response to this question, whilst it may be appropriate to review the boundaries, it is considered that in principle, the two HMA's as previously adopted in the Northern and Southern Test Valley should be retained. Andover and Romsey perform very different functions and lie within different HMA's, and this should be recognised in the emerging Local Plan.</p> <p>Romsey in the Southern Test Valley HMA has a strong geographical relationship with Southampton and has historically seen a large quantum of development come forward here, at North Baddesley and at other settlements close to the Southampton boundary.</p> <p>Andover in the Northern Test Valley HMA, acts as a supporting urban core and service provider for the network of villages and small settlements that are spread across the largely rural remainder of the Borough. Andover also benefits from connections to larger settlements outside the Borough including Salisbury, Winchester and further afield to London which makes it an appropriate focus for growth and development.</p> <p>Within the HMAs, the importance of rural settlements should however be recognised through the emerging Local Plan. In the adopted Local Plan, allocations for development were focused solely on major centres and key service centres. This is despite identifying 36 dwellings per year as part of the requirement for the Northern HMA, which were expected to be delivered as windfalls, through infill or rural exception schemes. This strategy failed to recognise the potential to allocate proportionate growth to smaller settlements, that would help to ensure the vitality and viability of services and facilities in the future by facilitating some growth and reduce the Council's reliance on windfall development in the rural area.</p> <p>For example, the village of Abbots Ann, located within the Northern HMA close to Andover, would be appropriate to deliver some growth as a smaller, sustainable settlement.</p>



<p><b>Question 2</b></p>	<p><i>Question 2 asks, in determining HMAs how should wider relationships with settlements beyond the Borough's boundaries, be taken into account, including with Southampton, Salisbury and Winchester?</i></p> <p>It is considered that it is important for any strategy to take into account the wider settlements beyond the boundaries as they have an influence on the housing and economic needs of the Borough. Romsey and North Baddesley in Southern Test Valley HMA have a strong relationship with Southampton whereas Andover in Northern Test Valley HMA has connections to larger settlements outside the Borough including Salisbury, Winchester and further afield to London.</p> <p>When determining the appropriate level of growth to be delivered at each HMA, the connections with other settlements beyond the Borough should be given consideration. This should recognise that there are likely to be residents living within the HMA that commute to these larger settlements for work, and vice versa, so this should influence both housing and employment requirements in the emerging Local Plan.</p>
<p><b>Question 3</b></p>	<p><i>Question 3 asks should an alternative approach to using Parish boundaries be used for HMAs? If so, would this be easily identifiable and practical for monitoring purposes?</i></p> <p>It is considered that Parish boundaries can serve a useful contribution to defining Housing Market Areas. If an alternative approach were adopted this may cause difficulties for monitoring purposes, as well as leading to potential conflicts with Neighbourhood Plans. It is considered that there is a case for reviewing the boundaries as part of the emerging Local Plan, particularly around rural villages to ensure that these are located within the correct HMA.</p>

4	<p><i>Should the number of steps of the settlement hierarchy be increased, for example by sub-dividing the 'rural villages' into two separate tiers?</i></p> <p>The settlement hierarchy in the adopted Local Plan has four tiers: Major Centres (Andover &amp; Romsey); Key Service Centres; Rural Villages; and the Countryside (including all other villages). This represents a simplistic approach, which although straightforward, doesn't distinguish between sustainable villages and settlements that lack services and facilities. This is likely to have justified the Council's approach to not allocating development at any of the 'rural villages' in the adopted Local Plan, instead focusing growth at only the major centres and key service centres.</p> <p>The emerging Local Plan provides an opportunity to remedy this, by sub-dividing the rural villages category into two separate tiers in the hierarchy. This should recognise the more sustainable village such as Abbots Ann, which was identified in the Settlement Hierarchy Topic Paper 2014 as sustainable as it benefits from a Primary School, food store, leisure and community facilities. In addition, it is located in close proximity to Andover, with a wider range of facilities that are easily accessible. As a result, villages such as Abbots Ann and those that are more sustainable should be recognised within a new sub-tier.</p>
5	<p><i>How should we decide which settlements to include within each step of the hierarchy?</i></p> <p>As the settlement hierarchy is a key basis for determining where it is appropriate to allocate future growth in an emerging Local Plan, it is essential that a robust process is used to determine which settlements to include within each tier or step of the hierarchy. The Council should seek to score each settlement against a defined set of criteria, which represents consideration of sustainability criteria. This process should give regard to the level of services and facilities each settlement has in its own right, as well as if it is located in close proximity to a higher order settlement and benefits from good access to additional facilities.</p> <p>It is considered that settlements should score highly if they have for example, a Primary School, food store, health facility and/or wider community facilities. They should also score well if they benefit from easy access to higher order settlements and their corresponding facilities and services including employment provision, town centre uses and train station.</p> <p>A good example of such a settlement is Abbots Ann that has a good level of services and facilities in its own right but is also located close to Andover which is a higher order settlement, identified in the adopted Local Plan as a major centre. Through this reconsideration of the sustainability of settlements, Abbots Ann should be identified as suitable to accommodate growth.</p>



6	<p><i>Should we consider groups of rural settlements together, where these are closely related to each other and/or share services and facilities?</i></p> <p>This method of assessing settlements would not represent a suitable approach of accurately identifying settlements with growth potential, as each settlement should be assessed on its merits. The proximity to other settlements and therefore other services and facilities should be taken into consideration when seeking to determine the appropriate tier for settlements within a hierarchy, however to assess groups of settlements together would produce a distorted hierarchy.</p> <p>Although villages may be located in close proximity, services and facilities are likely to be distributed and not concentrated in a particular location. The distances between settlements within a group could be prohibitive to sustainable access and incorrectly promote the suitability of less sustainable smaller villages. Furthermore, by grouping rural settlements together and allocating development at a 'group', suitable sites for allocation could be located some distance from amenities and services when environmental constraints are taken into account. This could result in a car dependent development, that would be less likely to be the case where allocations are located at more sustainable settlements such as Abbots Ann.</p>
7	<p><i>How should we treat rural settlements which are close to other larger settlements and can therefore also easily access their facilities and services?</i></p> <p>Where rural settlements are located in close proximity to other larger settlements and benefit from good access to services and facilities, this should be recognised as part of the site selection process. Whilst the services and facilities available specifically within each settlement should be prioritised, recognition of the accessibility of wider services and facilities should be a consideration, particularly when these are, or could be, accessible by walking, cycling or public transport.</p> <p>This is pertinent when considering the village of Abbots Ann, as although a rural village, it is located in very close proximity to Andover, a major centre.</p>
8	<p><i>In updating the settlement boundaries to reflect recent development which has been built and development with planning permission, should we also include new allocations?</i></p> <p>The Council should reflect recent development, sites with planning permission and new allocations when amending settlement boundaries, in order to ensure that settlement boundaries do not restrict future development. It is important to ensure as part of this that settlement boundaries are not drawn too tightly around settlements, so that there is some flexibility and ensure that boundaries for the whole of the plan period. Failing to include new allocations within settlement boundaries could challenge the delivery of such allocations, as development could be constrained by policies that seek to restrict development. By drawing boundaries that allow some flexibility and appropriately include recent developments, permissions and allocations, this will assist the Local Planning Authority to deliver its housing requirement over the lifetime of the plan in a planned and sustainable way.</p>

9	<p><i>How should we define settlement boundaries? What types of land uses should be included, such as public open space?</i></p> <p>Settlement boundaries are an important consideration in plan-making in order to distinguish the areas where development is acceptable, and areas where development should be restricted. If boundaries are drawn too tightly, this limits the potential expansion of sustainable settlements and could lead to speculative development in less sustainable locations if a housing land supply is not maintained by the Local Planning Authority.</p> <p>In order to be robust, the Council should continue to ensure that boundaries are defensible, by basing boundaries on natural or man-made features that are clearly identifiable such as rivers, field boundaries or highways that can be easily mapped and understood on the ground.</p> <p>Settlement boundaries should be defined in a manner that ensures all facilities are included and should not exclude areas of public of open space for example.</p>
10	<p><i>Should the approach to using the whole curtilages for defining settlement boundaries be retained, or should we take account of physical boundaries which extend beyond curtilages, or limit settlements to only part of curtilages?</i></p> <p>In order for settlement boundaries to be robust, the Council should base them on physical features that are identifiable, easily mapped and visible on the ground. This will reduce potential confusion regarding what is inside or outside of the settlement boundary and help to ensure that boundaries enduring across the plan period.</p> <p>It is considered that a narrower approach that only includes parts of curtilages would not be appropriate or robust and would likely to give rise to confusion and conflicts.</p>
11	<p><i>Should settlement boundaries be drawn more tightly or more loosely, and perhaps reflecting which tier settlement is within the settlement hierarchy?</i></p> <p>To ensure that the plan-making process is robust, the same principles for settlement boundaries should be taken in regard to settlements in different tiers of the settlement hierarchy. This should be a flexible, but robust approach, that bases boundaries on physical features such as rivers or highways that can easily be mapped but are identifiable on the ground.</p> <p>It is very important to ensure that settlement boundaries are not too tightly drawn and can be flexible and last for the lifetime of the plan. This will assist the Local Planning Authority to deliver the housing requirement over the lifetime of the plan in a plan-led and sustainable way. An approach could be adopted where settlements that are higher up in the settlement hierarchy have settlement boundaries that are more loosely drawn to provide for a flexible approach to the location of development.</p>



12	<p><i>Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment?</i></p> <p>In order to ensure that the emerging Local Plan enables the delivery of growth across the Borough, settlement boundaries should be amended with some flexibility to provide for new allocations as a minimum, as well as further growth in sustainable locations. This is particularly important in relation to rural villages, where no growth was allocated by the current Local Plan, however may be appropriately located and served by facilities such that a proportionate level of growth would be sustainable. This will ensure that the emerging Local Plan accords with the provisions of the 2019 National Planning Policy Framework, as Paragraph 78 states that in order to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The Framework also suggests that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Restricting opportunities for development in rural areas to infill and redevelopment would conflict with the provisions of the Framework and the need to seek opportunities to boost housing delivery.</p>
----	---

### **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.





# CLAREMONT

PLANNING CONSULTANCY

Planning Policy  
Test Valley Borough Council  
Beech Hurst  
Weyhill Road  
Andover  
Hampshire  
SP10 3AJ

24 August 2020

Dear Sir or Madam

**REPRESENTATIONS TO TEST VALLEY BOROUGH COUNCIL - NEXT LOCAL PLAN:  
REFINED ISSUES AND OPTIONS CONSULTATION 2020 - PROMOTION OF LAND AT  
BULBERRY FIELD, DUCK STREET, ABBOTTS ANN**

On behalf of our client Southern and Regional Developments Ltd, Claremont Planning have been instructed to respond to the Refined Issues and Options Consultation that has been produced as part of the ongoing preparation of Test Valley Borough Council 'Next Local Plan'. These comments are made in the context of our client's site at Bulberry Field, Duck Street Abbots Ann that is being promoted for residential allocation through the forthcoming Local Plan.

Claremont Planning have completed the required comments forms and provided a Site Location Plan that are both attached to this letter. Claremont Planning are keen to demonstrate that the site is available, suitable and deliverable, and that the site can robustly contribute towards the housing supply of the next Local Plan period.

**The Site and Surrounding Area**

The site extends to approximately 3.25 hectares and is located adjacent to the settlement of Abbots Ann, as shown on the attached Site Location Plan. The site is greenfield in nature, is currently vacant and was in previous use for agriculture. It is located outside of the Abbots Ann Conservation Area. Mature trees and shrubs line the perimeter of the site and the central part of it is open. Along the eastern boundary of the site is an informal track known as Old Church Road. To the north of the site are detached houses and Manor Close and a mixture of dwelling types are located to the west. Abbots Ann Church of England Primary School is a short distance to the south-west of the site. To the east of the site is open countryside.

Abbots Ann has several local facilities and services available to residents and visitors. As well as the school the settlement has a nursery, a village shop/post office, children's play area and recreation ground, St Mary's Church and a public house. The majority of these facilities are located a short walk to the north of the site.

## **Planning History**

An outline planning application was refused consent in November 2015 for the erection of up to 70 dwellings with associated public open space and access. This application was given the reference number 15/01634/OUTN. It is considered that the site offers a suitable and sustainable location to promote for residential development through the Local Plan review and that a lower quantum of development could be achieved on this site in a sympathetic setting that would overcome the previous reasons for refusal.

## **Local Planning Policy Position**

The Test Valley Borough Revised Local Plan DPD 2011-2029 was adopted by the Council on 27<sup>th</sup> January 2016. This Plan contains policies and proposals for determining planning applications and identifying strategic allocations for housing, employment and other uses. Within the adopted Local Plan, the site is situated adjacent to the built-up area of Abbots Ann and is currently located beyond the settlement boundary within the open countryside.

The Council have embarked on a review of the Local Plan to take policies and proposals forward to at least 2036. As the first stage in the preparation of the Local Plan, the Council undertook a consultation on the Issues and Options between July and September 2018. The aim of the Plan was to gain views on the issues that face the Borough including how much development should be planned for and where it should go. Claremont Planning responded to the SHEELA in 2019 putting forward the site as a suitable location for future development. This response to the refined Issues and Options document further supports our client's position in terms of their views on where residential development should be located and the need to provide sustainable locations in a variety of locations to ensure that the Council's future housing requirements can be met.

## **Planning Prospects**

The site is located adjacent to the settlement of Abbots Ann, a sustainable village in close proximity of the major settlement of Andover. This site can offer a suitable location to accommodate growth that can assist in meeting future housing needs for the District, in particular the settlement of Abbots Ann and the Northern HMA. The site is unconstrained in regard to landscape or ecological considerations and is fully located within Flood Zone 1 so at a low risk of flooding. There is no known contamination or hazardous waste issues associated with the site given the previous agricultural use and the site is not located within an Air Quality Management Area. The site is outside of the Conservation Area, with no listed buildings or Scheduled Monuments on or adjacent to it. The perimeters of the site benefit from mature landscape treatment and as a result, the site is well contained and offers a logical rounding off to the settlement.

The site is in a sustainable location on the southern side of Abbots Ann, in close proximity to the school with existing residential properties to the north and west. There is capacity to accommodate development in a sensitive layout, utilising and strengthening the existing boundary treatment and offering the opportunity to assist in the natural and proportionate growth of this sustainable village.

## **Conclusion**

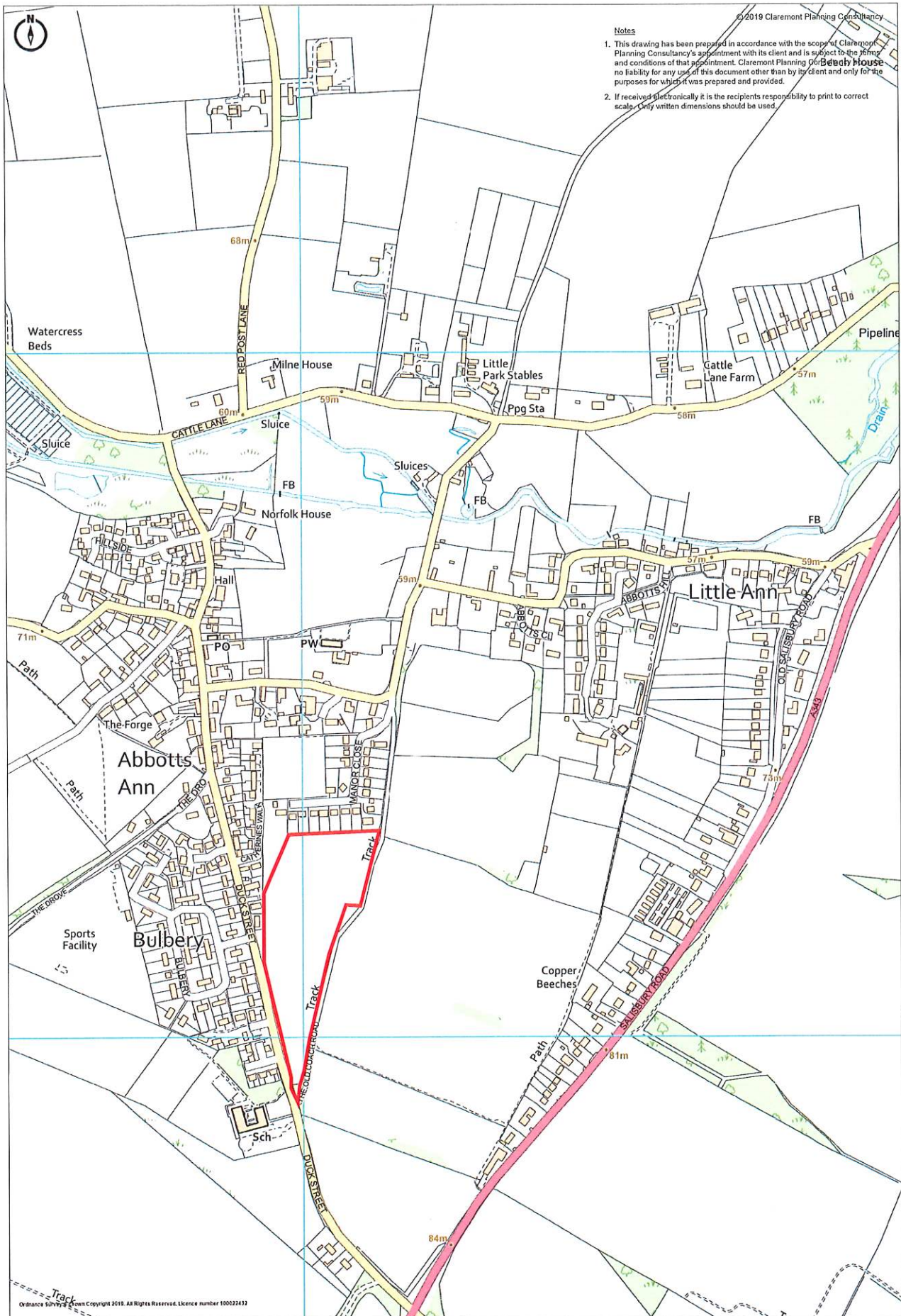
Claremont Planning are keen to promote the site through the 'Next Local Plan' as a suitable site for residential development. The site is in a sustainable location and considered highly appropriate for residential development, with an allocation in the emerging Local Plan will

secure its delivery in the short-term. There are no constraints to development and the site offers a suitable location to assist in meeting the District's housing needs.

Please do not hesitate to contact me should you have any queries or wish to discuss the site in more detail.







**Project** Land at Bulbery Field  
**Title** Site Location Plan

**Drawing Number**  
 04527-01  
**REV**  
 00

<b>Status</b> FINAL	<b>Drawn By</b> JC	<b>PM/Checked by</b> SJ	<b>Approved</b> Approved
<b>Job Ref</b> 04527	<b>Scale @ A4</b> 1:7500	<b>Date Created</b> 17/10/2019	

