1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore LLP on behalf of Western Air (Thruxton) Ltd in response to the Refined Issues and Options Consultation on the Test Valley New Local Plan.
- 1.2 Western Air (Thruxton) Ltd current operate Thruxton Aerodrome ('the site') and surrounding land. The extent of the site is shown on the plan at **Appendix 1**.
- 1.3 The site is located to the north of the A303 and south of Snoddington Road, west of the settlement of Thruxton. Thruxton is the nearest settlement west of Andover, approximately 5 miles away.
- 1.4 The site comprises an aerodrome (operated under an CAA Ordinary Licence) and associated modern hangers for storage and air related businesses, motor racing, skid pan, kart racing and industrial and recycling uses to the south. The industrial uses are provided in a collection of ageing industrial buildings arranged in an ad hoc configuration, providing warehouse, office and industrial floorspace.
- 1.5 The site currently accommodates over 30 separate businesses (on the industrial estate and airfield) and is the focus of economic activity in the local area, positively contributing to the local economy and employment opportunities.
- 1.6 Further, the site has easy access to the A303 and has few physical or environmental constraints.
- 1.7 However, despite the site's current characteristics it is not identified within the adopted Test Valley Borough Revised Local Plan (2016) as an existing employment site or as an area where further development would be encouraged. Indeed, it is currently identified as falling outwith the settlement boundary of Thruxton, within the open countryside and within a mineral consultation area. The existing Local Plan position does not reflect the current site conditions or the important role and function the site plays in the local economy.
- 1.8 The importance of the site to the local area is however recognised in the draft Thruxton Neighbourhood Plan which notes that its relationship with the Parish (of Thruxton) and community is current 'symbiotic and positive'. Indeed, emerging Neighbourhood Plan policy EC1 is supportive of further commercial development at the site provided that it is part of a long term plan for the site and its users, it delivers benefits for the airfield, Parish and local environment and it contributes to the importance of the motor and

- aviation industries and its sense of place and identity.
- 1.9 Representations were submitted to the Issues and Options draft Plan (in September 2018) seeking a more permissive policy position particularly in relation to the industrial estate part of the site. A copy of the representations are contained at Appendix 2.
- 1.10 The opportunity now exists to consider the future of the site in a more wholistic manner, aimed at securing the long term future of the site and maximising the economic and community benefits it can deliver over the emerging Local Plan period.
- 1.11 The site is available and in our view suitable for development and is evidently deliverable within the Plan period.
- 1.12 As a result, these representations are aimed at encouraging a positive dialogue with both the Local Authority and Parish Council and will be supported by a future Call for Sites submission. We would therefore welcome the opportunity to discuss these representations and the owners' wider aspirations further in due course.

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2.0 RESPONSES TO THE REFINED ISSUES AND OPTIONS CONSULTATION DOCUMENT

- 2.1 The refined Issues and Options document is framed as providing a high-level overview of the issues affecting the borough and the potential options to address them. However, in the questions it asks it primarily focusses on some quite detailed and narrowly defined housing matters as opposed to setting out and asking questions on some more fundamental issues. For example, it contains little on how the growth of the borough can best be balanced in a sustainable way, or how the closely interlinked nature of maintaining and growing a successful economy can best be balanced to support existing settlements and the required number of new homes.
- 2.2 It also does not recognise its relationship with neighbouring authorities, not only in unmet housing need, but also in terms of environmental constraints and economic relationships.
- 2.3 Paragraph 8 of NPPF 2019 sets out the overarching objectives of achieving sustainable development, which it states are interdependent and need to be pursued in mutually supportive ways, so that "the opportunities can be taken to secure net gains across each of the different objectives" of economic, social and environmental objectives.
- 2.4 The starting point for a local plan, once land has been identified as available, suitable and achievable, and therefore deliverable (as is the case here) should be considering how sustainable development can be achieved spatially, taking into account where the need for development arises (including unmet need from neighbouring authorities) key infrastructure (existing and opportunities to improve or provide new) as well as relationships with the wider geography the area.

The Economy and Housing

- 2.5 The relationship between the economy and housing is fundamental. The emerging Local Plan is currently planning for the provision of 588 new homes a year. However, the recently published new Standard Methodology for calculating housing need indicates a 38% increase to 813 new homes a year. The emerging Local Plan will therefore need to plan carefully for the additional housing numbers and identify appropriate sites to accommodate that growth.
- 2.6 In addition, there is also significant unmet housing need in the south Hampshire subregion, which has to be met in or near to where that need arises. This need is primarily generated by Test Valley's immediate neighbours Southampton and New Forest district

(more than 12,000 dwellings in the Southampton HMA alone and more than 17,000 dwellings in the whole of the Partnership for South Hampshire(PfSH) area to 2036). Using the new Standard Methodology, the average increase in housing provision across the PfSH area will increase by a further 25%.

- 2.7 On the basis that many of the local authority areas in PfSH are restricted by physical or environmental constraints, there are limited options to meet this housing need. Test Valley is however a relatively unconstrained authority and should as a result be seeking to accommodate a fair proportion of this unmet need, and any future unmet need.
- 2.8 It is therefore essential that the emerging local plan recognising this increase in unmet housing need and not only plans for the right amount of housing, but also for the requisite amount of employment, commercial, and service space required to support the growing population and create sustainable communities.
- 2.9 The site represents a sustainable location which can accommodate a mix of uses including residential.

Working in Test Valley (Local Economy)

2.10 The refined Issues and Options document (at paragraph 6.12) states that:

"A strong and robust local economy is key to delivering prosperity and quality of life. The next Local Plan will aim to be positive in supporting future economic growth and productivity, alongside quality of life and protecting the Borough's environmental assets which are also important in making the area an attractive business location".

- 2.11 Whilst this statement is welcomed, the emerging Local Plan is also an opportunity for the Council to clearly set out its ambitions for the borough in terms of encouraging inward and external investment. Such a positive statement would provide confidence and encouragement to developers and investors.
- 2.12 Indeed, Paragraph 81 a) of the NPPF (2019) states that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration." In this regard, the Local Plan should ensure that it considers all relevant strategies when considering an increase to the minimum standard method figure to support future economic growth of the Borough.

- 2.13 The site is located within Northwest Hampshire, as identified in the Enterprise M3 Local Industrial Strategy. The Northwest Hampshire area is significant in size but unlike the other sub-regional areas identified which have multiple settlements in each, it only includes Andover which recognises its more rural character. The area is identified as having strong relationships with the Thames Valley due to the A303 and its direct links to the A34 (leading to M4) and the M3.
- 2.14 Indeed, the refined Issues and Options document (at paragraph 6.13) acknowledges that the borough is easily accessible by road and rail to all corners of the UK, with the A303 being the key distributor road in the borough and a key location for employment opportunities at Andover Business Park and the site.
- 2.15 The Economic Assessment (March 2016) shows that Test Valley has a high representation in growing sectors such as 'wholesale', 'transport & storage' and 'professional, scientific & technical'. This is a positive position when considering the future uncertainty for other employment sectors such as general office and retail provision.
- 2.16 The Employment Land Study (Feb 2018) references the A303 being a key location but primarily focusses on the south coast, acknowledging how the industrial sector along the south coast continues to be 'hot property' with consistent levels of competition seen for all product types.
- 2.17 Paragraph 6.16 of the consultation document states the local plan will make provision for the employment land and premises needed in the borough, taking account of the changes in the structure of the local economy and the requirements for sites and buildings.
- 2.18 There will be many changes in how people live, work, shop and pursue leisure pursuits across the lifetime of the Local Plan. Internet shopping is already having a profound impact on town centres, and this is recognised by the Council with its aspirations to redevelop the main centres of Romsey and Andover. Increased internet shopping will also influence the kind of employment space required as more and more distribution centres will be required on key transport links, not just for Test Valley residents but for the whole of the UK.
- 2.19 When considering needs of this sort a more strategic view needs to be taken as to how a strategic road such as the A303 operates in the distribution network and requirements that may evolve at key locations along it, such as the site.

- 2.20 The Government's has recently published a number of changes (and potential changes) to the Use Classes Order, the GDPO and the planning system in general (through the publication of the White Paper: Planning for the Future). A common thread in all of the documents is that land use, and the planning system, will need to be more market-led, more responsive to market changes, and will need to be more flexible than any time in the past to provide for growth and prosperity.
- 2.21 To thrive, existing and important sites such as the site will need to become increasingly multi-functional and flexible to support the mix of commercial, leisure, recreational and tourism uses. This needs to be supported by an ambitious, forward thinking, and flexible planning policy.
- 2.22 Currently, the site is only identified in the draft Neighbourhood Plan. As the emerging Local Plan moves forward, the site should be identified for further development. This would build on the current uses whilst recognising an appropriate amount of flexibility moving forward to allow for businesses to invest, expand, and adapt. This would optimise the site's contribution to the job market and employment offer in this part of the borough.
- 2.23 Indeed, we believe that the site is appropriate for significant development over the plan period, building on its history and reputation to support Andover (and its continued growth), and promoting the area as being attractive for further inward investment and maintaining its commercial competitiveness.
- 2.24 In this regard, Western Air (Thruxton) Ltd would welcome discussing this with the council and how it could be best achieved through a long-term masterplan for the site.

3.0 SUMMARY

- 3.1 The Local Plan should be ambitious and seek to plan to ensure that existing and future communities thrive.
- 3.2 Western Air (Thruxton) Ltd have an aspirations for the site to further contribute to the residential and commercial needs of the borough.
- 3.3 The site is an existing recreation, leisure, tourism and employment site located with easy access on to the A303, the key distributor road in Test Valley.
- 3.4 The site is available and suitable for further development and therefore deliverable to accommodate some of the identified and future needs of the borough.
- 3.5 It is essential that the Local Plan not only plans for the right amount of housing, but also for the requisite amount of employment and commercial opportunities for those growing community across the borough.
- 3.6 When considering needs of this sort a more strategic view needs to be taken as to how a strategic road such as the A303 operates in the distribution network and requirements that may evolve at key locations along it, such as the site.
- 3.7 In order to thrive, the site will need to become increasingly multi-functional and flexible to support the mix of commercial, leisure, recreational and tourism uses. This needs to be supported by an ambitious, forward thinking, and flexible planning policy. This would optimise the site's contribution to the local job market and employment offer for this part of the borough.
- 3.8 Western Air (Thruxton) Ltd would welcome discussing this with the council and how it could be best achieved through a long-term masterplan for the site.
- 3.9 We trust that the representations are helpful. If the Council would consider it beneficial to discuss the representations provided, we would welcome working with the Council as part of the Local Plan preparation process.

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