

It is clear on the basis of this that the Government fully recognises the need for growth in rural villages to make sure that they can survive and become sustainable in the long term. As set out below, the site provides a good opportunity to help achieve this in the village of Wherwell as there would be limited impacts on the local area, including nearby residents. The development of the site also provides an opportunity for improvements in the area which will deliver benefits for the wider village.

We respond to relevant questions which are posed within the Issues and Options consultation document as follows:

***“Question 1: Should the two existing HMAs be retained or amended?”***

Due to its administrative boundaries, TVBC has two clear centres: Andover in the north, and Romsey in the south. Approximately 46% of the population of the Borough is concentrated within these two locations.

Andover has a high degree of self-containment, and the adopted Local Plan states that 70% of the residents living in the town also work there. Southern Test Valley, however, is less self-contained due to its strong relationship with South Hampshire and its good transport links, meaning it experiences much more in- and out-commuting for both employment and other facilities such as leisure and retail.

The Planning Practice Guidance (PPG) states that three different sources should be considered when identifying housing market areas (HMAs), namely:

- House prices and rates of change in house prices
- Household migration and search patterns
- Contextual data including Travel to Work Areas (TTWAs), retail and school catchment area

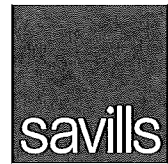
The Issues and Options consultation states: *“A HMA is a broad geographical area in which generally most people both live and work”* (Paragraph 5.11). Based on this definition, as well as the contextual data recommended by the PPG, then TTWAs are a suitable method to identifying HMAs, as these define approximate self-contained labour market areas. These are areas where most people both live and work, therefore relatively few people cross a TTWA boundary on their way to work, and they are based on statistical analysis, rather than administrative boundaries.

The Office for National Statistics (ONS) has identified 228 TTWAs in the UK, of which 151 are in England. Test Valley is covered by two TTWAs: Andover and Southampton. The Southampton TTWA covers Southern Test Valley, the New Forest Authority Area and National Park, Eastleigh and Winchester.

Given the geography of the Borough, and the key differences between the north and south, and the identified TTWAs that separate the Borough, it is felt that the division of Test Valley into two HMAs is the correct approach. This has been the consistent approach in previous planning policies and the currently adopted Local Plan.

***“Question 6: Should we consider groups of rural settlements together, where these are closely related to each other?”***

Local Plans should be prepared to take account of local needs and reflective of local trends.



Many rural communities have historically been linked together, sharing vital facilities, services and amenities, and sharing the responsibility of their upkeep. This is more important than ever, as the country's rural areas are becoming less affordable, affecting those who have grown up in the community, and forcing them to move out of the area when purchasing a property of their own or starting a family.

The NPPF also recognises the role that shared facilities have for these rural communities, stating that: "*Where there are groups of smaller settlements, development in one village may support services in a village nearby*" (Paragraph 78).

Therefore, the Local Plan should recognise the relationship between nearby settlements, such as Wherwell and Chilbolton, and relevant policies should consider them together in order to ensure the rural communities that they support continue to grow and thrive in a sustainable way.

***"Question 8: In updating the settlement boundaries to reflect recent development which has been built and development with planning permission, should we also include new allocations?"***

Housing allocations should be used to demonstrate how the Local Plan will meet the identified housing requirement across the plan period. According to the NPPF, once identified, they should be published within adopted policies maps.

Given the importance of allocating appropriate land for housing in order to meet identified local housing needs in the Borough, it is imperative that they are included within emerging Settlement Boundaries in order to demonstrate a sound strategy that these objectively assessed needs can be met

### **The Site and its surroundings**

The site has an area of circa 0.52 hectares and is currently part of an agricultural field located between Beech Grove and New Barn Lane in the northern part of Wherwell. Whilst outside of the current defined village settlement, the site lies immediate adjacent to it, and adjacent to existing residential development in Beech Grove. It is therefore not isolated nor detached from the village. Beech Grove currently contains a number of existing dwellings, both detached and semi-detached in nature, and all which front onto the highway with relatively deep rear gardens. Due to topography of the area, Beech Grove is also set at a higher land level than The Old Hill and High Street which lie to the south east.

The site is relatively unconstrained. It is located in Flood Zone 1 (lowest risk of fluvial flooding), and outside of the Wherwell Conservation Area. No listed buildings are located onsite and any nearby heritage assets would be considered accordingly as part of any future development. The site is also located outside of a designated Area of Outstanding Natural Beauty (AONB) or Area of Great Landscape Value (AGLV).

Within the village of Wherwell there are a number of local facilities, all of which serve the existing community and would be capable of addressing daily needs of future residents of the site. This includes a public house, primary school and pre-school, sports club and bus stop. The facilities are within walking distance of the site.

### **Proposals for the Site**

The site is being proposed to the emerging local plan for a residential development of eight new homes, equating to 15.4 dph. This is a relatively low density but is proposed to reflect the character and appearance



of the existing village, existing development patterns and the site's location on the edge of the current settlement boundary.

It is currently anticipated that the development would be accessed off New Barn Lane, with additional access, transport and infrastructure improvements being made to the road, which would not only benefit the development site but also those currently living, accessing or visiting the village. Specialist transport advice will be sought in relation to this, in addition to early engagement with the Highway Authority.

As highlighted above, the topography of the area means that Beech Grove is at a higher land level than the main village centre and High Street. As a result, the design of the development on the site will take this into account, ensuring a sensitive, appropriate form with a soft edge to the settlement being created by this site. This will be enhanced through the use of appropriate materials and landscaping that will be established in liaison with the Council as the design for the site is progressed. However, the site is well screened from the surrounding rural area and, due to its location adjacent to existing residential properties, future development would be capable of successfully integrating into the settlement without significantly changing the character of the village.

### **Delivery of the Site**

The NPPF is clear of the importance of ensuring sites are deliverable within the plan period to ensure housing needs are met and to boost significantly the supply of housing. As part of this, Paragraph 67 states that planning policies should identify a sufficient supply and mix of sites *"taking into account their availability, suitability and likely economic viability"*. The paragraph goes on to require that policies identify specific, deliverable sites for years 1-5 of the plan period, and specific, deliverable sites, or broad locations for growth for years 6-10 and, where possible, 11-15 of the plan.

In this case, the site is considered to be deliverable within years 1-5 of the emerging plan and this was also confirmed in the earlier SHELAA submission made in relation to this site. In detail, the PPG advises on what factors can be considered in relation to suitability, availability and achievability of a site. These are broadly examined below.

### Suitability

Paragraph 018 (Reference ID: 3-018-20190722) of the PPG identifies that a site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated. This includes having regard to, for example, national policy and potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation. The PPG also advises that plan makers need to identify different forms of development, where appropriate, taking into account the range of needs for housing, economic and other uses.

In this instance the site is relatively unconstrained and is adjacent to existing residential development within a village setting. The site is well screened by existing planting and is able to gain access to the existing highway network. Any impacts of development, including in terms of infrastructure, landscape and heritage can be appropriately mitigated as a result of the scale of development proposed, size and location of the site, and relationship to the existing settlement.



### Availability

Paragraph 019 (Reference ID: 3-019-20190722) of the PPG states that a site can be considered available when, on the best information available, there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.

This representation and the earlier SHELAA submission was made on behalf of the landowner. It is therefore evident that the site is available.

### Achievability

Paragraph 020 (Reference ID: 3-020-20190722) of the PPG states that a site is considered achievable where there is a reasonable prospect of a development being developed on the site at a particular point in time.

As above, this representation and the earlier SHELAA submission was made on behalf of the landowner. There are no known factors that would prevent the site coming forward and being delivered with a 1-5 year period.

On this basis, it is considered evident that the site is deliverable within a five year period and therefore should be included as an allocation in the emerging plan. The site is capable of helping to address local housing needs in the village, delivering a range of homes in a sensitive, well designed manner that will add to the character and prosperity of the village in the long term.

### **Conclusion**

This representation has been prepared in response to TBVC's second Regulation 18 consultation on the emerging Local Plan. The Council has demonstrated that previous strategies in relation to housing development and allocation have provided sufficient housing within the current adopted Local Plan, however changes to the Government's Standard Methodology for the calculation of Local Housing Need indicate that the Council needs to plan for significantly more homes within the emerging Local Plan.

The Borough has a strong history of being divided into two Housing Market Areas (HMA) recognising the differences that the two centres of Andover and Romsey have and the differences between the north and south of the Borough in terms of household migration, travel to work areas and catchments for retail and services. In light of Government guidance on how HMAs should be identified, this approach should be continued within the emerging Local Plan and should therefore be used to set out the housing figures for the future plan period.

The Borough also has a strong rural community, spread across a number of villages and smaller settlements. However, these settlements should not be treated in isolation, and the emerging Local Plan should look to identify where rural villages share amenities, and therefore should be considered together in relation to future development proposals.

Looking toward the allocations in the emerging Local Plan, these representations have been submitted on behalf of land at Beech Grove. The document has represented how the site is suitable, available and achievable in accordance with the requirements of National Planning Policy.

A modest development of eight dwellings could serve to provide much needed new homes within Wherwell, whilst still retaining and respecting the rural density, character and appearance of the settlement. The site



could deliver these dwellings within the early part of the plan period, bolstering the early supply of housing within the first five years of the plan.

I would be grateful if you would take these representations to the Regulation 18 Consultation into account and I look forward to receiving your confirmation of receipt. I would highlight that Savills and The Wherwell Estate reserve the right to comment fully on all aspects of the plan going forward, including on any evidence base documents and the Regulation 19 consultation that may not have been addressed in this response.

