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2.0 RESPONSES TO THE QUESTIONS IN THE REFINED ISSUES AND OPTIONS CONSULTATION DOCUMENT

Planning for the Future

- 2.1 This consultation document sets out a proposed timetable for the production of the Local Plan, which includes a number of non-statutory additional stages of consultation. In light of the Government's recently published White Paper: Planning for the Future, which sets a direction of travel to significantly amend the current planning system, we recommend TVBC revise their timetable to align with the Government's intention to speed up plan making to take a maximum of 30 months.
- 2.2 Under the current system, the Government expects local plans to be reviewed every five years so they are up-to-date; for Test Valley this would be 2021. Adoption of the new local plan is anticipated in Q3 2024, three years after the adopted local plan becomes five years old. This puts TVBC at risk of speculative, unplanned development, at a time where the adopted Local Plan could be considered out of date.

Plan Period

- 2.3 The consultation document also acknowledges that the plan period for the new Local Plan will be set out in the forthcoming Preferred Options consultation (anticipated Q1 2021). The proposed plan period should be for a minimum of 15 years, albeit this may reduce to 10 years as suggest by the Government White Paper. In defining this timescale, TVBC should have regard to the date in which the Council fixes its evidence on housing need using the Government's standard methodology. The base date for the local housing need and affordability evidence should not pre-date the start of the plan period. The plan period should also allow for sufficient time for submission, examination and adoption of the plan.

Housing Requirement

- 2.4 Following the publication of the TVBC's consultation document, the Government has published their proposed revisions to the Standard Method, as part of the 'Planning for the Future' consultation. These proposals are set to increase the starting point estimate of housing need nationally to 337,000 homes per annum, which equates to a 75,000 homes per annum increase from the existing method.
- 2.5 For Test Valley, the proposed Standard Method (2020) sets a figure of 813 homes per annum, which is an increase of 263 homes per annum (48%) from the current standard method figures.

2.1 The current standard methodology determines a minimum housing need for the Borough when preparing their emerging Local Plan, as set out in NPPF Paragraph 60 and national planning guidance (NPPG) Reference ID: 2a-002-20190220. The NPPG (ref 2a-010-20190220) is clear that Local Planning Authorities should plan for higher amounts of housing where possible in order to accommodate unmet needs from neighbouring authorities, support strategic infrastructure improvements and encourage economic growth, particularly where population projections are indicating higher levels of growth is anticipated.

2.2 It is imperative that Test Valley, as a relatively unconstrained district with excellent transport links to London, Basingstoke, Salisbury, Southampton and Winchester should accommodate an appropriate proportion of wider needs within their Emerging Local Plan currently required by the Duty to Cooperate. Furthermore, by accommodating such homes in Test Valley, there would be a great opportunity to provide a range of type and sizes of homes (such as family housing) that accommodate those who work within the wider area, but cannot find suitable or desired accommodation.

2.3 For this reason, TVBC within their Local Plan Review should pursue as a minimum the higher housing requirement set out in the proposed standard methodology.

Housing Distribution Q1-Q3

2.4 The 2019 NPPF has removed the need for the assessment of housing need to be based on Housing Market Areas (HMAs). In order to meet the tests of soundness, new homes need to be located in sustainable locations, close to where the demand arises in order to minimise the need to travel, support economic growth and maintain social relationships.

2.5 TVBC could maintain their existing two HMAs or merge them into a single HMA. In either scenario, the HMA should be informed by a spatial strategy which defines the most sustainable locations for growth, such as Andover.

2.6 Providing development as an extension to an existing settlement, such as Bere Hill, would be in accordance with paragraph 72 of the NPPF which acknowledges that the supply of large numbers of new homes can often best be achieved through planning for larger scale development, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

2.7 Andover's sustainable location within the Borough should also be maximised, in line with national policy intentions to locate development in sustainable locations. The town has

public transport links to Salisbury, Basingstoke, Winchester and London and lies on the strategic A303 trunk road that offers wider connections to the A34, the M3 and the South West. It acts as the supporting urban centre for much of the northern part of the Borough through the provision of services, education facilities and community infrastructure and is a major employment location within the Borough. Development sites that lie in accessible, sustainable locations, such as Bere Hill, can support Andover's current role and make use of sustainable transport connections and employment opportunities.

- 2.8 This consolidation of Andover's role as the largest settlement in the Borough is important as continued housing development in the town helps to secure the growth and diversification of the local economy. Andover plays a vital role as an employment centre and service provider for smaller rural communities which the Local Plan should be seeking to maintain.
- 2.9 A significant proportion of the Borough's residents live and work in Andover, and the provision of additional housing at Bere Hill is an opportunity to provide sustainable development within proximity of existing public transport links, existing services and Andover town centre. Close to the Site lie existing schools, supermarkets, sports facilities at Picket Twenty and the A303 strategic trunk road offering connections to the A34, M3 and the south west. Additionally, Bere Hill presents the opportunity for the provision of a Country Park, increasing the quality of life for Andover's residents and according with the aspiration to improve the quality of the green space in Andover as set out in the Andover Vision.
- 2.10 Test Valley Borough when compared with neighbouring authorities such as Wiltshire, West Berkshire and the New Forest has much lower levels of constraint including Area of Outstanding Natural Beauty (AONB), National Park and Special Protection Area (SPA). Only the very northern part of the Borough lies within the North Wessex Downs AONB and only a small area in the southwest lies within the New Forest National Park. This lower level of constraint indicates that Test Valley can have an important role in meeting housing need within the wider south Hampshire area without impacting upon designated areas, by accommodating overspill from neighbouring authorities through the Duty to Cooperate process.
- 2.11 We recognise that TVBC are preparing a masterplan for the redevelopment of Andover town centre, which will seek to accommodate residential development. Whilst we commend the redevelopment of brownfield land, in a sustainable location, there are limitations on the mix of housing which can be provided in town centre locations, including the amount of both public and private amenity space. We, therefore, consider that the Council needs to promote

a range of sites throughout the town and its edges in order to accommodate a range of housing types to meet the needs of all its residents.

Settlement Hierarchy Q4-Q7

- 2.12 L&Q believe that the majority of the Borough's strategic growth should be supported at Andover as the most sustainable location, as it contains the highest level of services and access to employment opportunities. It also has the greatest ability to provide sustainable development and a mix of housing, which can meet the wider needs of the market, which is much more difficult to achieve with proportional or piecemeal development. This approach is at the heart of national planning policy, as set out at Paragraph 103 of the NPPF (2018):

"Significant development should be focused on locations with are or can be made sustainable, through limiting the need to travel".

- 2.13 A focus of strategic development at the Borough's largest settlements promotes both development in the most sustainable locations and the retaining of existing services. Land at Bere Hill provides an opportunity to cater for the development needs of Andover in a location close to its town centre, with the Site having opportunities to link into existing public transport networks alongside having access to the services at the nearby urban extension of Picket Twenty.
- 2.14 It is understood that some growth is required at rural settlements in order to support rural communities and services, but development needs to be focused in the most sustainable areas. Test Valley, outside of Andover and Romsey is a largely rural Borough and it, therefore, needs to focus growth where there is existing infrastructure, or opportunities to enhance existing infrastructure. Given the ability of the Borough's two largest settlements to support new development, they should be the focus of development within the emerging Local Plan.
- 2.15 There is no specific national planning guidance on how a settlement hierarchy should be defined but the NPPF does provide some key issues that need to be addressed. The NPPF explicitly states that Local Plans must address the spatial implications of sustainable development by setting out clear policies on what will or will not be permitted and where (NPPF paragraph 154).
- 2.16 In order to determine where settlements sit within the hierarchy, the site assessment process will be fundamental to ensure the sites being taken forward are suitable, available and deliverable. Specifying growth in the rural areas is a step change compared to the

adopted Local Plan and ultimately these locations must be demonstrated as sustainable as informed by a spatial strategy.

- 2.17 In planning terms, it is important to be able to define those places capable of hosting future development, and those that are not, on a logical basis. This is an important part of promoting overall sustainable development and of protecting sensitive parts of the area from excessive or inappropriate levels of development
- 2.18 TVBC must also recognise that development in smaller settlements is often piecemeal and does not provide the same opportunities or planning gain as larger, well planned sites such as affordable housing, strategic open space and education contributions. Small sites can create a negative impact on a settlement, alone or in combination, because the combined effects cannot always be assessed comprehensively nor can the planning benefits be combined to offer sufficient mitigation.

Settlement boundaries Q8-Q11

- 2.19 Generally, settlement boundaries define where open market housing will be allowed provided that the development is in keeping with the form and character of the area and can be appropriately accessed and serviced. By defining settlement boundaries, the areas outside of the boundary are recognised for the purposes of planning policy as countryside where new development will be strictly controlled.
- 2.20 The role of settlement boundaries has shifted at a national and regional level in terms of being a mechanism to secure sustainable development. Focusing new market housing development to locations with reasonable day-to-day facilities is seen as a key way in which the planning system can help reduce contributions to climate change, protect the countryside and landscape and increase the proportion of homes which have access to services and facilities by means other than the private car.
- 2.21 The NPPF at paragraph 157 provides guidance on setting boundaries around different land uses. Plans should '*indicate broad locations for strategic development on a key diagram and land use designations on a proposals map*'. In addition, Plans should '*allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate*'.
- 2.22 Paragraph 17 of the NPPF, on core planning principles, requires Plans to '*take account of the different roles and character of different areas, promoting the vitality of our main urban areas...*' which is generally taken as requiring the differentiation of areas for different uses such as settlements and the Open Countryside. In addition, they should '*actively manage*

patterns of growth to make fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable...' which can be interpreted as encouraging the focusing of development into settlements as they are the most sustainable places.

- 2.23 L&Q believe that the emerging Local Plan should consider reviewing settlement boundaries so that land parcels that present opportunities to meet housing need in sustainable locations can be included within them. Bere Hill was assessed in the 2019/20 SHELAA by the Council and was concluded to be available immediately, likely to be achievable and deliverable but not suitable due to its location outside of the current settlement boundary. It is, therefore, appropriate to seek alterations to the settlement boundary to include the Site within Andover's settlement boundary.
- 2.24 The Landscape and Visual Appraisal (LVA) submitted at Appendix 2 alongside these representations determine that Bere Hill's character has significantly altered over the last decade through the development of the adjacent Picket Twenty urban extension, a development of 1200 homes directly to the east of Bere Hill which breaks the Bere Hill/Tinker's Hill landscape ridge to the north of both Picket Twenty and Bere Hill. The development of the area that forms the Picket Twenty allocation and its further expansion to the east has urbanised the land to the south of the Bere Hill/Tinker's Hill ridge, and as such Bere Hill is now surrounded by residential development on three sides, with the A303 bordering the adjacent land parcel to the south. The Site is deemed to no longer lie in a rural setting, offering the opportunity to accommodate housing growth at Andover without a significant extension into the countryside. As such, Bere Hill warrants inclusion within an amended settlement boundary.
- 2.25 We support updating settlement boundaries to reflect recent development which has been built, subject to planning permission or allocated for development. In each of these scenarios, the land has been demonstrated as being capable of accommodating sustainable development and therefore should be within the boundary of a settlement. For those settlements that are not compact in nature, applying a settlement boundary could lead to large areas of white land being included that is not in a sustainable location.

Housing Mix and Affordable Housing

- 2.26 In the absence of any up to date evidence from the Council, it is difficult to judge whether a target of 40% affordable homes being sought within the Borough is still deliverable. Affordable housing targets should reflect local housing market needs but should be flexible enough to accommodate for individual site viability, as well as assessed housing needs (paragraph 004 Reference ID: 23b-004-20190901 of the NPPG).
- 2.27 The Council should seek the provision of affordable housing to be in line with paragraph 62 of the NPPF (2019):
- “Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:*
- a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and*
- b) the agreed approach contributes to the objective of creating mixed and balanced communities.”*
- 2.28 The trigger for the seeking of affordable housing should reflect national policy. Paragraph 63 of the NPPF (2019) states:
- “Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer).”*
- 2.29 The policy that sets out the trigger for affordable housing should also include a clause acknowledging that the required provision is subject to the viability of individual sites. A blanket approach for triggers and the provision of affordable housing is inflexible and would not reflect market evidence for the housing needs of the Borough.
- 2.30 It is noted that the Council intend to prepare a Strategic Housing Market Assessment (SHMA) as part of the next stage of the Local Plan. We reserve the right to comment on this evidence and whether it adequately determines an appropriate level of affordable housing provision for the Borough. It is also noted that the Council intend to update their evidence on affordable housing viability, which will include a review of CIL.
- 2.31 As per paragraph 005 ID: 23b-005-20190315 of the NPPG, plans should be informed by a proportionate assessment of viability, taking into account all policies. Therefore, the affordable housing requirement should be subject to viability when considered against other

policies in the plan, including the draft proposals for enhanced energy efficiency standards, zero-carbon measures, increased biodiversity net gain, space standards and other community facilities or infrastructure requirements/contributions identified

- 2.32 Overall, L&Q are supportive of providing affordable housing on the Site, and as far as possible would seek to provide a policy compliant scheme, provided the percentage of affordable housing to be provided is fully evidenced and justified in terms of viability and need, and subject to other infrastructure requirements required within any allocation policy.

Self Build and Custom Build Q13-Q16

- 2.33 The consultation document contains several detailed questions in respect of self build and custom build. L&Q recognise there is a requirement for Local Authorities to maintain a register of interested parties.
- 2.34 In respect of the need of a specific policy on this matter, this is in principle supported. However, we reserve the right to comment on the actual policy wording when published and will seek to ensure it is not too prescriptive, and allows sufficient flexibility for development to come forward.

Design standards and density

- 2.35 The Government has previously set out nationally described space standards within their statutory guidance. The NPPG at Paragraph 020 (Reference ID: 56-020-20150327) states that Local Planning Authorities should provide justification if an internal space standards policy is required. The Council is required to adhere to national policy regarding internal space standards and any future Local Plan policy requirements should also be consistent with the statutory guidance. L&Q consider the most appropriate approach is to review any evidence determining the need for internal space standards and to adhere to national guidance to avoid becoming out of date if new standards are introduced.
- 2.36 It is important that developments promote an efficient use of land to accommodate for housing need, but also that they consider and respond to the character of an area. Any policy relating to density should be flexible enough to allow for sites to reflect local market conditions and viability as well as the availability of infrastructure and the establishing of good design.
- 2.37 Paragraph 122 of the NPPF (2019) states that:

“Planning policies and decisions should support development that makes an efficient use of land”.

On this basis, L&Q wish to resist a prescriptive policy for density, and instead propose that density issues are considered on a site-specific basis.

Local Green Space

- 2.38 The identification and designation of Local Areas of Green Space should be informed by an up to date evidence base that reflects local needs for green space and should be in accordance with national policy. Paragraph 100 of the NPFF (2019) states:

“The Local Green Space designation should only be used where the green space is:
a) in reasonably close proximity to the community it serves;
b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
c) local in character and is not an extensive tract of land.”

- 2.39 We understand that TVBC has commissioned evidence based studies regarding playing pitch provision, green space strategy and sport facility strategy. Following publication of these, we will review comment as deemed appropriate.

- 2.40 In this regard, the Andover Vision sets out aspirations for improvements to, and additional, green space provisions around the town. Whilst the Vision is not statutory policy it has identified a need which should be taken into account by the Council in the preparation of the emerging Local Plan. To help achieve this, L&Q have incorporated a Country Park into the proposals for Bere Hill which would provide a different and independent offer, but is still able to be linked into the town’s network of green and open spaces.

The Council should also seek to improve the resident’s access to high quality green space in and around the larger settlements in the Borough. The Andover Vision identifies a need to enhance green and recreational spaces and to acquire additional green spaces and parkland as the town grows. Test Valley does not currently have any Country Park provision, and so through the provision of a Country Park at Bere Hill there is the opportunity to provide new high-quality green space.

- 2.41 The evidence base for the emerging Local Plan needs to identify if there is an existing deficit in open space provision within the Borough to determine if there are opportunities for sites to provide for new open space within their proposals. There is an identified (although not

quantified) need in the Andover Vision for enhanced green and recreational spaces to support the future wellbeing and sustainability of the town. The proposals for development at Bere Hill include proposals for the provision of a Country Park alongside housing, creating a high-quality green space that takes advantage of northern Test Valley's chalk downland landscape for which there is no current Country Park provision.

- 2.42 The provision of a Country Park at Bere Hill also gives access to a different kind of open space within the town, whilst benefitting from the site's location within proximity of the town centre and public transport links. Provision also offers the opportunity to create an alternative recreational destination, potentially relieving pressure from the area of Ancient Woodland and Site of Importance for Nature Conservation (SINC) at Harewood Forest to the southeast of Andover. A new Country Park as part of the proposals for Bere Hill is a key opportunity to provide the high-quality green space that the residents and stakeholders of the town aspire towards and will positively address both the wider deficit in provision of Country Parks and local recreational pressures.
- 2.43 Any policy for the provision of open space needs to be adaptable to allow for off-site provision where appropriate, which in turn can reap benefits through the pooling of contributions towards the provision of larger-scale facilities.

Sustainable Construction and Renewable Energy

- 2.44 This matter should be kept under review throughout the preparation of the Local Plan, in light of the Government's Future Homes Standards consultation. This consultation states at paragraph 2.28 that the Government is exploring whether to commence the amendment to the Planning and Energy Act 2008 that would restrict local planning authorities from setting higher energy efficiency standards for new homes than the Future Homes Standard.

Biodiversity

- 2.45 We recognise the Government promotion for development to achieve biodiversity net gain. The need to achieve both net gain and mitigation for the impact of development needs to inform the Council's spatial strategy, to understand where sustainable development can be provided and how the needs of the borough can be met. This, on a borough-wide level, includes SANG, nutrient neutrality and biodiversity net gain.
- 2.46 The Country Park as part of the proposals at Bere Hill is an opportunity to provide formalised open space, and to enhance the green space offerings at Andover for the benefit of its

residents, whilst also providing opportunities for biodiversity net gain and nutrient neutrality.

Working in Test Valley

2.47 L&Q consider that the provision of more housing at Andover, the largest settlement within Test Valley, could help to attract more skilled workers, which is a key demographic needed to ensure economic prosperity. The attraction of skilled workers may help to rebalance the current economic provisions in Andover, which is currently focused towards manufacturing than office-based employment. Andover's key role as an employment centre can only be supported through the continued allocation of housing development to ensure the town meets its existing economic requirements and sees future growth.

2.48 At present TVBC's evidence base does not provide up-to-date evidence to show the number of homes required to support job growth, or what the number of jobs being targeted is. The most recent forecast to have been considered in the evidence base appears to be the Experian forecast set out in the Test Valley Economic Assessment (TVEA), March 2016. This is over four years old and requires updating. Notwithstanding this, the forecast showed projected growth of 6,100 jobs, 2015-2035 (305 jobs per annum). It is unclear whether the number of homes required to support such growth has been considered, and whether this level of job growth is considered sufficient to achieve the ambitions of the TVBC emerging Local Plan. This should be looked at fully by the Council through the preparation process of the emerging Local Plan. It is vital to provide economic growth in tandem to housing provision to ensure the Borough grows and functions sustainably.

2.49 The Local Industrial Strategy for Enterprise M3 area, which includes Andover, states that housing is fundamental to the character and nature of the area and the success of the economy. The lack of affordable and suitable housing has a significant impact on businesses and in particular on attracting and retaining skilled labour. This is critical to support inward investment and the wider analysis undertaken by Enterprise M3 has shown that the area as a whole is becoming less competitive.

Infrastructure and community facilities

2.50 In order for the Local Plan to truly reflect the needs of the Borough, an updated Infrastructure Delivery Plan needs to be published. The emerging Local Plan can, however, at this point consider opportunities to improve connectivity and movement and it may be appropriate to create policies to ensure increased connectivity where possible.

- 2.51 Policies would need to be flexible enough to allow for individual sites to respond to the needs and opportunities specific to their locations. The Council should seek to promote sustainable transport by locating growth in sustainable locations such as at Bere Hill, close to existing transport facilities, or in places where the opportunity to enhance existing options is available. It is very difficult to achieve a modal shift in the use of sustainable modes of transport if development is located in rural areas where residents and occupants are reliant on the private car.
- 2.52 The proposals at Bere Hill provide an opportunity to create pedestrian and cycle links along Micheldever Road from the Site into the neighbouring suburbs within Andover and to link into the existing networks that connect to the town centre. Established public transport links at Picket Twenty also provide opportunities for linking immediately adjacent services to the Site as well as providing access to Andover town centre and train station.