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# Regulation 18 Stage 1 Consultation

## Test Valley Draft Local Plan 2040

### Representations

Prepared on behalf of Wates Developments Ltd

April 2022

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<b>Project Ref:</b>	28383
<b>Status:</b>	FINAL
<b>Issue/Rev:</b>	2
<b>Date:</b>	07/04/2022
<b>Prepared by:</b>	RS
<b>Checked by:</b>	RS
<b>Authorised by:</b>	RS

Barton Willmore, now Stantec



Tel:

Email:



Ref: 28383/A3/RS

Date: 7 April 2022

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**CONTENTS**

**PAGE**

**1.0 INTRODUCTION ..... 1**

**2.0 RESPONSE TO REGULATION 18 STAGE 1 CONSULTATION  
DOCUMENT ..... 5**

**3.0 SUMMARY ..... 16**

## 1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore, now Stantec on behalf of Wates Developments Ltd in response to the Regulation 18 Stage 1 Consultation on the Test Valley Draft Local Plan 2040 which is currently subject to public consultation.
- 1.2 Wates Developments is generally supportive of the Draft Local Plan and wishes to highlight a number of matters which we would encourage Test Valley Borough Council (TVBC) considering and incorporating into the Local Plan.
- 1.3 Wates Developments has an interest in land at Velmore Farm, which is located immediately to the south of Valley Park, within Chilworth Parish, as shown on the plan below.



- 1.4 The site comprises 62 hectares and lies on the southern side of Templars Way, adjacent to Valley Park and Chandler's Ford, and in close proximity to Chilworth and North Baddesley. Housing development and Templars Way is to the north; Valley Park retail and employment area is immediately to the east and Hut Wood which is designated as a Forest Park is to the south. To the west is open countryside. The site is closely located to the M27 and M3.

1.5 The site abuts Valley Park which is a Tier 2 Key Service Centre in the Local Plan Settlement Hierarchy. Key Service Centres have access to identified services and facilities including shops, bus routes, primary schools, employment, and public houses. The site is also in close proximity to both Chilworth and North Baddesley, which are also Key Services Centres. It is also adjacent to Chandler’s Ford which is a higher order settlement, but technically sits just outside the boundary of Test Valley in Eastleigh Borough. The site is also within walking distance of employment at the adjacent Hampshire Corporate Park as well as Asda supermarket and a gym at the recently completed Village Hotel. The site is served by a range of bus routes providing services to Eastleigh, Chandlers Ford, Southampton and beyond. In addition, Chandlers Ford railway station is within walking distance.

1.6 The table in Appendix 1 of the Draft Plan provides a summary of the Settlement Assessment Outcomes as follows:

Settlements	Number of key facilities	Number of other facilities	Good public transport	Tier as set out in Settlement Hierarchy
Valley Park	6	9*	H	2
Chilworth	4	2	M	2
North Baddesley	6	11*	H	2

*\*= For information, settlements with superfast broadband.*

*Key facilities include: food store; public house; primary school; outdoor sports facilities; community or village hall and a place of worship*

1.7 The site is, therefore, in a highly sustainable location, well connected to local key service centres, public transport higher order settlements, major economic hubs and employment areas including Southampton, Winchester, Romsey, and Eastleigh. This makes it an ideal location for future growth.

1.8 The site’s potential was identified in the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA, 2021), where in Appendix 9 (Southern Test Valley Mixed Use sites) it was identified as Site 82, concluding that the mixed use site “*could contribute to the housing supply in Southern Test Valley that would require a change in policy.*” It was considered to be available, suitable, and achievable, and therefore deliverable for 750 new homes, leisure, and employment to be delivered over the lifetime of the plan.

1.9 These representations set out how development at Velmore Farm can contribute to the Council's objectives as set out in the Draft Local Plan 2040. A Vision Document is being updated and will be submitted separately to TVBC. This sets out how a mixed use development can provide:

- a high quality modern sustainable community, for Test Valley Borough, in a highly sustainable location;
- sustainable mix of uses, including up to 850 new homes, 5000sqm employment, co-working space, a new primary school, local shops, and community uses, to complement those close by to optimise convenience and enable easy active travel to a variety of services, facilities, and job opportunities;
- the opportunity to phase the development to provide circa 500 new homes initially, with an appropriate proportion of open space, SANG and community facilities, with further homes and associated open space provided in the future;
- a new development that will be resilient to climate change, meeting the Council's latest carbon policies;
- new homes for sale and affordable homes both for rent and shared ownership, as well as First Homes;
- new homes designed to the latest space standards and will be adaptable for all, as well as including some properties for wheelchair users;
- a landscape-led layout that nestles development within the wider landscape, without detriment to the local gap;
- a form of development to optimise healthy and active lifestyles, encourage the use public transport and minimise private car use;
- all the public open space requirements of a new community of its size;
- a connected and integrated green infrastructure network that optimises its greenfield nature;
- integration of key heritage features, such as the Roman road into the green infrastructure network;
- protection to the nearby sites of nature conservation interest, the sites' ecology, including tree preservation orders, and the opportunity to enhance biodiversity;
- on-site suitable alternative natural green space (SANG) within easy walking distance of all residents to minimise impact on the New Forest SPA;
- options nutrient neutrality that will evolve as the proposals progresses;
- financial contributions to compensate for any increase in pressure on the Solent SPA;
- carefully considered mitigation and exclusion of any flood risk on site;

- potential to accommodate unmet need from the PfSH area;
- significant economic benefits to Valley Park, Chilworth, North Baddesley and Test Valley.

## **2.0 RESPONSE TO REGULATION 18 STAGE 1 CONSULTATION DOCUMENT**

- 2.1 Wates Developments is generally supportive of the draft Local Plan and wishes to highlight a number of matters which we would encourage Test Valley Borough Council (TVBC) considering and incorporating into the Local Plan.

### **Plan Period**

- 2.2 The Council's proposed extension of the plan period from 2036 to 2040 is supported as this offers the opportunity to plan more effectively and comprehensively for the needs of Test Valley and the PFSH area.

### **Regional Context and the Duty to Cooperate**

- 2.3 Wates Developments is pleased to see TVBC engaging with its neighbouring authorities as set out in paragraphs 2.16 to 2.20. In particular, Wates is encouraged to see the work being undertaken with authorities across south Hampshire, including the County Council and PFSH, particularly in respect of the joint Statement of Common Ground. Clearly, in relying on the work undertaken by PFSH, TVBC will need to ensure this work has also been subject to sufficient consultation and independent examination so as to ensure the strategy for TVBC is sound.

### Unmet Need in Neighbouring Authorities in PFSH

- 2.4 The Statement of Common Ground identifies a significant amount of unmet housing need in the PFSH area. It will be necessary to ensure that these needs are met across the PFSH area and TVBC will need to undertake the necessary work to consider the extent of this housing need that can be accommodated within the Borough.
- 2.5 With the various Local Plans across the PFSH area at different stages in the statutory making process, and environmental and physical constraints of some local authorities, the choices of where this unmet need can/should go is inevitably limited. Within the currently identified Southampton HMA, the options for meeting unmet need which cannot be provided for within the defined urban areas, including Southampton, are limited to south Test Valley and south Winchester City.



- 2.6 The southern part of Test Valley, including the site at Velmore Farm, lies within the PfSH boundary, as currently defined, and therefore plays a key role in helping meet that unmet need. It is also our understanding that PfSH has considered the land at Velmore Farm to accommodate strategic development. We would be pleased to discuss this further with TVBC and PfSH so as to consider the form of development that may best meet both the needs of TVBC and the wider PfSH area in the most sustainable way.
- 2.7 “Housing need” extends far beyond merely housing numbers, ensuring the social, economic, and environmental needs of the Borough are met in full. If the full housing needs across the PfSH area are not met in full, it would lead to increasing patterns of unsustainable development which will harm the environment and prevent social progress.
- 2.8 The provision of housing also needs to consider the type of housing that is required. The majority of new housing need in the area is for family housing, which can often be more difficult to provide within the cities and constrained urban areas, where the majority of new housing stock is typically biased toward smaller apartments.
- 2.9 As part of its plan-making process, TVBC will therefore need to consider how to accommodate a fair proportion of the unmet need that has been identified by PfSH, taking into account the Borough’s location within and adjacent to the PfSH boundary and the relative unconstrained nature of its Borough.
- 2.10 The proposed development at Velmore Farm provides one of only a very limited number of opportunities to provide sustainably located new family homes adjacent to several key services centres and in close proximity to higher order settlements, where there is a wide range of facilities, services, transport infrastructure and employment and a fantastic relationship with the wider PfSH area.

### **The Council’s Vision, Key Challenges and Objectives**

- 2.11 Wates Developments supports the objectives set out in the Local Plan and considers they collectively meet the objectives set out in the NPPF which recognises the interdependence of economic, social, and environmental objectives, and the need for them to be pursued in mutually supportive ways. The proposals at Velmore Farm will assist the Council to achieving ALL of its objectives:

- Climate Change
- Our Communities
- Town Centres
- Built, Historic and Natural Environment
- Ecology & Biodiversity
- Health, Wellbeing, Culture, Leisure, and Recreation
- Design
- Housing
- Economy, Employment and Skills
- Transport & Movement

2.12 In particular, Wates Developments recognises the Council's emphasis on countering climate change. As paragraph 2.27 of the Draft Plan states, the Local Plan 2040 will influence the location of development, shape, design, and orientation of development. It will facilitate and support sustainable transport modes, sustainable sources of energy used, reduce our vulnerability to weather conditions, integrate nature-based solutions and aid the transition to a low carbon economy. Collectively these can have a significant impact on reducing our carbon emissions.

2.13 The proposals at Velmore Farm will provide a new development, community and environment that is in a highly sustainable location and will be laid out, shaped, designed, and orientated to be adaptable and resilient to the changing climate. It will facilitate more sustainable living and manage the risks of flooding (which is only a very small part of the site in any event) whilst seeking to protect our water resources and reduce emissions, in accordance with latest national and TVBC policies.

2.14 In terms of 'Our Communities' objective, Velmore will deliver a sustainable, cohesive, and healthy community, whilst strengthening the sustainability and range of services and community offering at Valley Park, Chilworth and North Baddesley. The proposal will enhance the social, green, health, educational and other local infrastructure through new development in this highly sustainable location. In turn, it will support the viability of the Borough's key service centres in helping to meet many of the daily needs of the new community and existing residents.

- 2.15 With regard to the town centre objective, Wates Developments supports the regeneration strategies and masterplan process to optimise Andover and Romsey as a brownfield first objective. However, it is recognised that such sites are complex and constrained. By their very nature they will not provide for all housing needs in the Borough nor mitigate the impacts of increasing the population in such confined areas. As such, a variety of sites: brownfield and greenfield, large, and small, across the Borough will be required to fulfil the full housing needs, support its settlements and to assist in meeting the unmet needs of its neighbouring authorities, particularly taking account of the significant shortfall through PfSH.
- 2.16 The Vision Document to be submitted separately will set out how mixed use development at Velmore Farm can fulfil the Councils objectives as set out in the draft Local Plan.

### **Spatial Strategy**

- 2.17 One of the tasks in preparing the Local Plan will be considering how sustainable development can be achieved spatially and at different scales, so as to meet the housing, social and economic needs of an area, maximising environmental opportunity, whilst also 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) and relationships across the wider geography the area.
- 2.18 As advocated within the NPPF, the Local Plan should also identify a spatial strategy that provides for healthier lifestyles by ensuring that new development provides all types of new homes in sustainable locations with good access to major economic hubs, large employment areas and key social infrastructure such as schools via means of walking, cycling and/or public transport. This way, the reliance on the car could be reduced, which would also support the Council's Climate Emergency Action Plan and Vision and Objectives for the Local Plan.
- 2.19 This is particularly important in a Borough such as Test Valley which has acknowledged very high levels of car use in comparison to the national average. Whilst it is recognised that Test Valley's car ownership is likely to remain above the national average due to the rural nature of the borough, the spatial strategy should focus growth where reliance on the car can be minimised and genuine alternatives to the private car can be offered. For example, in locations with excellent access by sustainable modes to the largest range of services, facilities and employment, where residents have a choice not to use their car.

- 2.20 In addition, the Local Plan will need to provide affordable housing in sustainable locations with good accessibility to public transport to help reduce the reliance on the private car. Indeed, focusing new development in highly accessible, sustainable locations may increase the use of public transport.
- 2.21 Velmore Farm is in a highly sustainable location, being very close to major centres, major areas of employment and facilities and is highly accessible via public transport.
- 2.22 The Council's proposed spatial strategy appears to be a hybrid of three options presented in the Issues and Options document, as informed by the Sustainability Appraisal (SA):
- *focus on supporting regeneration of Andover and Romsey town centres,*
  - *supporting growth at our key employment areas*
  - *supporting growth at our larger urban and rural communities throughout the Borough.*
- 2.23 This approach prioritises the regeneration of the two market towns along with a wider distribution of development to a larger number of settlements than the previous Local Plan. It is acknowledged that such an approach appears to be supported by the responses received to the Refined Issues and Options.
- 2.24 It is obviously important for any town, urban area, or village to receive proportionate levels of growth, providing they are in a sustainable location and have, or could have, services and facilities to support a growing community throughout the plan period and beyond. Development should enhance the community and not just impact on it; therefore, size and location must be carefully considered. Not every settlement in Test Valley will have the appropriate level of services and facilities to be considered appropriate for development under a sustainable spatial strategy, particularly given that many of the Borough's settlements are comparably small. TVBC will therefore need to ensure that opportunities for sustainable patterns of development are provided for through locating development in the most sustainable locations, such as at Velmore Farm.

- 2.25 Further, in the southern part of the Borough, there is the additional need provide mitigation for impacts on the New Forest SPA, nutrient neutrality, *and* biodiversity net gain. In considering where development should be provided, TVBC will need to consider the ability for sites to be able to provide on-site mitigation, alongside consideration of the ability of the Council to provide strategic mitigation opportunities in this part of Borough.
- 2.26 It is noted in the NPPF, paragraph 73, that "*the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.*"
- 2.27 These types of large greenfield sites, such as Velmore Farm, can not only provide opportunities for sustainable, resilient, and healthy mixed new communities alongside wider social, environmental, and economic benefits, but also to provide the green infrastructure that can help that community 'consume its own smoke' on site in terms of impact on the New Forest SPA (by providing on-site SANG) nutrient neutrality and biodiversity net gain.
- 2.28 The Covid-19 pandemic has led to a new way of working, living, shopping, and getting exercise. In the housebuilding industry there has been a notable increase in demand for houses as opposed to flats, flexible living and working space, good size private outdoor space and easily accessed public open space which provides variety and interest for all ages and the opportunity to exercise from the front door. Large sites, such as Velmore Farm, can offer all this as well as accommodating other needs of a new community, which may not be possible in town centres or on small sites.

### **Settlement Hierarchy & Settlement Assessment**

- 2.29 Wates Developments supports the settlement hierarchy and settlement assessment as set out in the draft Local Plan, (including Appendix 1).
- 2.30 In response to the Council's request in summer 2021, the following table was completed, demonstrating just how well located Velmore Farm is in relation to the key services and facilities identified in the Draft Plan, in relation to Valley Park and Chandlers Ford:

Key Destination	Name/Address of closest provision	Distance via			Key Destination proposed as part of the development of the site (Yes/No)
		Road (km)	Dedicated footpath separate from road (if applicable) (km)	Dedicated cycleway separate from road (if applicable) (km)	
Town Centre	Chandlers Ford	3 (6 mins)			YES
Local Centre	Asda Eastleigh Bournemouth Road, Chandler's Ford	0.5			YES
Railway Station	Chandlers Ford	2			YES
Bus Stop <sup>1</sup>	Templars Way bus stop Bluestar Service 5	Adjacent to site			YES
Primary School	St Francis C of E Primary School Pilgrims Close, Eastleigh	0.7			YES
Secondary School	Toynbee School Bodycoasts Road, Chandler's Ford	2.7			YES
Convenience Store	Asda Eastleigh Bournemouth Road, Chandler's Ford	0.5			YES
Doctors Surgery	St Francis Surgery Pilgrims Close, Chandler's Ford	0.5			YES
Business Park/Industrial Estate	Hampshire Corporate Park	Adjacent to site			YES
Leisure Facility	Knightwood Leisure Centre Skys Wood Road, Chandler's Ford	1			YES

- 2.31 In order to provide for sustainable communities, opportunities to integrate housing with employment through mixed use development should also be maximised. This is particularly relevant where there is the opportunity to support already successful employment locations alongside housing and community facilities within easy walking and cycling distances, such as at Velmore Farm.
- 2.32 Furthermore, consideration should be given to the potential for new development to provide key additional social and community infrastructure that can complement and enhance existing services and facilities, including parkland and access to open space, for the benefit of new and existing residents, to help create social cohesion and a resilient, healthy, thriving community.

### **Strategic Policy Framework**

- 2.33 It is recognised that the draft Local Plan does not set out a complete suite of the required strategic policies. This will come forward in the next version of the plan. Wates Developments acknowledges that the Council is seeking support for the policy stance it has set out in regard to key policy areas such as climate change, zero carbon development and the environment. Wates Developments supports such aspirations, whilst noting that policies will need to be drafted in accordance with the prevalent planning and environmental law, National Planning Policy and Guidance and case law at the time. If the Council wish to go further, then it will be necessary to provide robust evidence to justify its position at any Examination.

- 2.34 It is good to see in paragraph 4.41 of the Draft Plan, that the Council recognises that there is no reference to local gaps in the current NPPF, and as such has no formal basis for inclusion in the Local Plan, notwithstanding any local support for such policies to be retained. If "gaps" are to be included in the Local Plan it will be necessary for TVBC to provide sufficient evidence to demonstrate the need for such policies and designations, justifying why the land / area designated is necessary to prevent the coalescence of settlements having regard to maintaining their physical and visual separation, providing the minimum land necessary to achieve these objectives. Any criteria-based policy will also need to accord with the NPPF.
- 2.35 In this regard, it is worth highlighting that in order to minimise impact and create a high quality, sustainable, thriving living environment, the proposed development at Velmore Farm would be landscape-led in its layout and design, responding to its context, and assimilating itself into the wider landscape; providing significant tree and landscape planting, buffers of open space and a green infrastructure network; protecting and enhancing natural landscape and biodiversity features and the footpath; and strengthening the site's links and relationship with its surroundings.
- 2.36 In this regard, the form of proposed development at Velmore Farm has been designed to meet the following criteria - and can evolve to meet the other requirements as the proposals progress:
- Strategic Policy 1: Countering Climate Change; in particular:
    - b) Opportunities have been taken to maximise the potential for active and sustainable travel and minimise unnecessary travel;
    - c) The development, including associated facilities and infrastructure, is designed to be adaptable to changing needs, technologies, and a changing climate;
    - d) It is designed to provide appropriate resilience and reduce vulnerability to extreme weather conditions (including drought), flooding and overheating, and makes efficient use of water;
    - e) It conserves and enhances coherent and resilient ecological networks and green infrastructure networks, while delivering net gains for biodiversity; and
    - f) Appropriate opportunities have been taken to use or reuse land efficiently, minimise the use and promote the sustainable use of resources and promote a circular economy.

- Strategic Policy 2: Delivering Healthy, Well-Designed Development
  - A. Development is based on comprehensive design principles, derived from a contextual analysis of the site and its surroundings;
  - B. Development will maintain or enhance the sense of place and distinctive character of the locality, through taking account of the individuality of the Borough's settlements, landscapes, buildings, and heritage assets;
  - C. Development will contribute positively to, and not detract from, the distinctive character of the immediate and wider landscape.
  - D. Development will take opportunities, wherever possible, to improve the public realm and minimise opportunities for anti-social behaviour and crime.
  - E. Development will be designed to be resilient to the changing climate by adopting sustainable design practices.
  - F. High quality green and blue infrastructure will provide resilient hard and soft landscaping and integrate biodiversity enhancements.
  - G. The layout of new developments will be permeable and legible allowing for suitable access and movement for all users. Development will need to be designed to prioritise sustainable and active travel.
  - I. Major development will need to take account of and respond positively to relevant local and national design guidance and codes. Applicants will be expected to produce a masterplan, design code or design and access statement as part of the planning application depending on the nature and scale of development.

### **Meeting Our Needs**

- 2.37 Wates Developments supports TVBC in accommodating its full housing and employment needs for all parts of the community, in addition to any unmet needs from nearby districts, such as across the PFSH area. Such needs are not merely "numbers" but real people and households – existing and emerging – in need of a real home and places to work. If such households are not provided with a home in the area they need it, or employment space close to their home, they do not simply disappear; rather they are forced to find homes and work elsewhere. This not only has social consequences of separating people from their support networks, family and the additional time and cost of travel, but also economic consequences through people choosing to also work elsewhere, harming the very economy that is already lagging behind the rest of the South East. Furthermore, such forced choices have environmental consequences,



through the additional transport of these people between their home and their support network or place of work.

- 2.38 In order to achieve sustainable patterns of development, a wide variety of homes, employment space and community facilities should be located in close proximity to each other, providing people with genuine choice and opportunity to live in a sustainable way.
- 2.39 In considering employment needs, notwithstanding the requirements of the NPPF, how people work has changed significantly since the Covid-19 pandemic. There is therefore a risk of merely replicating historic employment trends, which may well not be fit for purpose in the forthcoming decades. Wates Developments would therefore encourage TVBC to undertake research and prepare evidence to justify the type, range, and location of employment floorspace that is likely to be needed, taking account of the post-pandemic working patterns.
- 2.40 Wates Developments recognises the different housing market areas across the Borough and the revised percentage division of housing proposed between northern and southern Test Valley (from 67%:33% to 57%:43% respectively) and would encourage TVBC to ensure the approach proposed in “Strategic Policy 6: Housing Provision” maximises opportunities for patterns of sustainable development.
- 2.41 Table 5.3 of the Draft Plan highlights a potential conflict between where housing is needed and where it is proposed to be provided:

Table 5.3: Housing Requirement and Supply<sup>47</sup>

	Borough wide	Southern Test Valley	Northern Test Valley
	2020 to 2040	2020 to 2040	2020 to 2040
Housing Requirement	10,820	4,653	6,167
Total Housing Supply	6,367	3,705	2,662
Residual Requirement	4,453	948	3,505

- 2.42 In addition to Romsey, the southern part of Test Valley has six out of the nine of the Tier 2 Key Service Centres and is in closer proximity to higher order settlements such as Chandlers Ford, Eastleigh, and Southampton. Furthermore, these settlements are well connected via sustainable transport networks to other higher order settlements such as Winchester and London, as well as being in close proximity to main line railway stations at Southampton Parkway and Winchester in addition to proximity to Southampton Airport. In seeking to plan for sustainable forms of development, consideration will need to be given to placing development close to economic drivers, such as existing and future major employment, for example Solent Freeport. In addition, consideration will need to be given to the type of housing provided in each area, which may will be different, depending on who will be living there, albeit with a predominant need for family housing.
- 2.43 It is noted that since the 2019 NPPF (and continued in the latest July 2021 version) there is no longer a requirement to base housing needs on HMAs. Therefore, Test Valley is able to meet its own minimum housing needs *anywhere* in the Borough if that approach is considered to be the most sustainable approach. It is therefore suggested that a more holistic approach should be taken which considers the social, environmental, and economic needs of the wider area; and how development across Test Valley can help meet those needs.
- 2.44 Further, in considering the unmet need of its neighbouring authorities, TVBC will need to assess how much of the unmet need of its neighbours in PFSH it should accommodate when considering the distribution of housing across the Borough.
- 2.45 With the above in mind, whilst the evidence and approach undertaken to date is a helpful starting point, a more detailed assessment will need to be undertaken which considers the needs of each community, settlement, and area, with appropriate policy responses provided. In this regard, a settlement by settlement / area by area analysis should be undertaken as part of the Local Plan evidence base to consider both the needs of each area / place alongside the sustainability considerations outlined above. Having undertaken such work, this may well determine that a different housing distribution is proposed which places a higher number of homes within the Southern Test Valley area. This distribution will obviously then need to be tested against reasonable alternatives in the sustainability appraisal.

### **3.0 SUMMARY**

- 3.1 Wates Developments is generally supportive of the Draft Local Plan and has highlighted a number of matters which we would encourage Test Valley Borough Council (TVBC) considering and incorporating into the Local Plan.
- 3.2 Wates Developments is promoting land at Velmore Farm for a mixed use development. The form of development and how it will deliver a sustainable high quality development will be set out in the Vision document to be submitted to TVBC separately. Velmore Farm is in a highly sustainable location and is able to provide for a range of housing, employment and community needs, securing a highly sustainable, healthy and thriving community.
- 3.3 The proposed extension of the plan period is supported.
- 3.4 In considering the extent of housing and employment needed within the Borough, Wates Developments would encourage TVBC to meet its full needs, so as to ensure sustainable patterns of development are planned for in the emerging Local Plan.
- 3.5 In this regard, consideration will need to be given to the proportion of unmet housing need that should be provided for within the Borough from the wider PfSH area, so that the full needs of the sub-region are met.
- 3.6 In considering the spatial strategy and distribution of housing and employment needs, TVBC should undertake a robust assessment of the needs of each settlement, which will be different. In doing so, it should also consider proximity to a wide range of employment, housing, and community infrastructure to support sustainable patterns of living. Such an assessment will ensure the most sustainable patterns of development are provided for.

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