



Our ref: 1721/KM/SP

Your ref: Regulation 18 Stage 1

Planning Policy and Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

By email: [REDACTED]

08 April 2022

Dear Sir / Madam

**REPRESENTATIONS ON BEHALF OF THE TRINLEY ESTATE
TEST VALLEY BOROUGH COUNCIL CONSULTATION FOR LOCAL PLAN 2040 REGULATION 18 STAGE 1**

I write on behalf of our client, the Trinley Estate, in response to the Test Valley Borough Council Draft Local Plan 2040 Regulation 18 Stage 1 consultation. This letter follows earlier representations made to the Strategic Housing Land Availability Assessment (SHLAA) in 2015, the Issues and Options consultation and the Strategic Housing and Economic Land Availability Assessment (SHELAA) in 2018 and to the Refined Issues and Options Consultation in August 2020, to promote land within our client's ownership at Finkley Farm, Andover.

[REDACTED] Strategy and Growth

We understand that the focus of the current stage of the Local Plan 2040 (Stage 1) is to set out the vision and objectives for the Borough Council, the spatial strategy, and to consider development needs and certain strategic policy areas, such as housing.

Within the document, the council sets out that the proposed objectives of the Local Plan 2040 include:

- *"Our Communities: Deliver and strengthen sustainable, cohesive and healthy communities in our towns and villages. Secure enhancements to social, green, health, educational and other local infrastructure through new development in sustainable locations. Support the viability of the Borough's town and local village centres in meeting many of the daily needs of our communities and residents.*
- *Housing: Provide a range of homes that are fit for purpose and designed to meet the needs and aspirations of different groups within the community, including a range of affordable housing and homes that meet the needs of an ageing population."*

Spatial Strategy

In respect of a proposed growth strategy, we note that at the Issues and Options stage, various options were put forward, including community-led distribution, proportionate distribution to parishes, local plan allocations, new village(s) or a mixed approach which could include a combination of the options. The draft Local Plan considers that a 'hybrid approach' of the following three options is the preferred option for distributing future development across the Borough:

- Option C – Concentrating development at key economic or employment centres
- Option D – Focusing development in the towns of Andover and Romsey
- Option E – Distributing development in order to support the largest settlements in the Borough (incorporating more urban and rural locations).

The Spatial Strategy Topic Paper expands on the approach: *"This reflects a slightly more dispersed growth approach than is currently the case in the Adopted Local Plan, through focusing growth not only at our largest range of sustainable settlements (both at towns and local service centres), but also at our larger and more sustainable rural settlements. Development at these locations can help to maintain and enhance vitality of the settlements and the range of facilities that they can support."*

In principle, a hybrid approach to growth is supported, particularly as it includes opportunities for growth in Andover which is one of the Borough's largest settlements and main towns and is noted as being generally urban in nature. As such, we note and support that Andover is classified as a 'Tier 1' settlement and is recognised for being the most sustainable locations in NTV, with a full range and number of services and a high level of accessibility by public transport. As a 'Tier 1' settlement, Andover is identified as playing a key role in supporting the needs of the wider population in Test Valley and potentially beyond.

We note that the majority of housing growth across the borough is required within the Northern Test Valley (NTV), which includes Andover, with a residual requirement to plan for 3,505 in this area up to 2040. In meeting housing requirement, we support the council's commitment to modify its strategy and distribute development to a mixture and range of sites. This of course will include smaller sites, however in order to deliver the infrastructure and facilities needed to support an increased population within the Borough, it is clear that the Council will need to make strategic allocations of land for large sites through the Local Plan.

Paragraph 73 of the National Planning Policy Framework (NPPF) (2021) recognises 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 (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way."*

The NPPF also considers that *"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should*

be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.”

Furthermore, it encourages *“Broad locations for development [to] be indicated on a key diagram, and land use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.”*

As noted above, since 2015, The Estate has promoted part of its land for residential development through the TVBC’s Strategic Housing (and Economic) Land Availability Assessment (SHLAA 2015 site reference 300; SHELAA 2018 site reference 231; and SHELAA 2019 site reference 231) and Local Plan consultation exercises.

The 2015 SHLAA assessment indicated that the Trinley Estate’s land (Land South of Finkley Farm) could be a suitable broad location for an urban extension to Andover Town, given the proximity of the site to East Anton and existing amenities and public transport links.

██████████ and the site in Appendix 4 which recognised that a change in policy would be required to bring this site forward for development. However, TVBC reached a different conclusion in the 2018 SHELAA assessment, indicating that the Trinley Estate’s land is a rural location and unsuitable for development. On behalf of our client, Pro Vision has previously raised concerns with the Council’s inconsistent assessment. Council officers made a commitment to review its assessment.

In the 2020 SHELAA assessment, the Trinley Estate’s land (site reference 231) was placed back into Appendix 4 recognising that a change in policy would be required to bring this site forward for development. The 2020 SHELAA indicated once again that the Trinley Estate’s land could be a suitable broad location for development.

It is therefore established that the Estates’ site is within a broad location for potential development to help meet the development needs of the next plan period. We understand that a change of policy is needed for this site to come forward, and we consider that the Local Plan 2040 provides that vehicle since settlement boundaries and policies will necessarily need to be reviewed to enable the housing and employment needs to be met.

The Draft Plan now clarifies that Andover falls within NTV which, as its own HMA, will be expected to deliver 57% of the total housing requirement of the Borough. It is essential therefore, that the council allocate sites for strategic growth to meet this local need, particularly in suitably identified ‘sustainable’ locations. These representations confirm that land within our client’s ownership at Finkley Farm, Andover, remains available for consideration and provides a unique opportunity to masterplan an urban extension which can assist the Council in meeting the objectives identified in the consultation document in relation to creating cohesive and healthy communities. We therefore encourage the council to continue to consider this opportunity to contribute to meeting the future needs of the borough and remain willing and ready to engage with the Council through the Local Plan process.

The paragraphs below provide a brief description of the site and its characteristics. In addition, previous representations - which provides further detail of, and includes, and technical assessments undertaken to date - are appended to this letter.

Development Opportunity at Finkley Farm, Andover

The Trinley Estate is located in north Hampshire and is approximately 3 miles (5km) to the north east of Andover Town Centre (Northern Test Valley). The Estate straddles the administrative boundaries of Test Valley Borough Council and Basingstoke and Deane Borough Council.

The total area of the Estate being promoted is circa 157 hectares comprising c.26ha of land to the north of Finkley Road and c.131ha of land to the south of Finkley Road. The southern part of the site is located between Finkley Road to the north and the Basingstoke – Salisbury railway line to the south. A plan identifying the location of the site can be found within the appended 'Site Promotion Document' prepared in August 2020.

Noting the constraints around the town, the logical broad location for growth continues to be eastwards. [REDACTED] 'Promotion for strategic development', development of this site could be delivered either as a town extension, or a separate garden village settlement, well connected to the town.

Initial assessments and masterplanning work indicate that the Site provides a number of opportunities to deliver a high quality sustainable new community for Andover and contribute towards the enhancement of the town and the improvement of its facilities. The appended promotion document presents a concept and vision for the development opportunity. It demonstrates the site could be developed to create a distinctive new community, with opportunities for a mix of uses, including residential, educational, recreational, retail, commercial and open space. There is even potential scope for a new mainline rail station. It is envisaged that the site could provide:

- Circa 2,500 new dwellings;
- A local centre / community hub with new employment and retail opportunities (10-15ha) which can contribute to the identified needs for significant additional employment floorspace within the Borough.
- A 6ha education hub which would include a school.
- A country park with opportunities for formal and informal recreation – reinforcing the setting of a Scheduled Ancient Monument in the south eastern corner and existing woodland.
- Appropriate buffer to the railway line with new strategic landscape planting belt.
- Significant opportunity for a net gain in biodiversity through strategic planting and landscaping, including sustainable drainage features providing new and varied habitats.
- Strategic pedestrian and cycle links connecting to Andover Town Centre and existing public rights of way in the area.
- Opportunity to provide space for a new local train station serving the significant 21st century growth on the eastern edge of the town.
- New pedestrian connection to link residential areas north and south of the Railway.

It is possible that the site could be delivered as two 'parcels' or 'phases' with the smaller, northern parcel, coming forward ahead of the larger, southern parcel.

Conclusions

This site is a logical strategy for significant future growth in the Borough by following and respecting a pattern of growth that has occurred over the past plan periods. Whilst the principles of the Council's proposed 'hybrid' approach to growth is generally supported, this site should be given serious consideration and identified as an opportunity for a strategic development as a key part of the spatial strategy or as a 'broad location for growth' as part of longer term aspirations.

We trust that the above, and appended, will be taken into account when preparing the next stage of the Local Plan and the Estate wishes to reiterate that it welcomes further discussions with stakeholders regarding ways in which this strategic development site can come forward through the Local Plan within the next plan period.

We would be grateful if you could acknowledge receipt of this letter and if you have any other questions or comments please do not hesitate to contact us.

Yours sincerely

[Redacted signature]

KATHERINE MILES BA (HONS) MSc MRTPI
PLANNING DIRECTOR

[Redacted contact information]

cc. The Trinley Estate

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