

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

By email only

6th April, 2022

Dear Sir / Madam

Response to TVBC Draft Local Plan 2040 – Regulation 18 Stage 1 on behalf of the Faberstown Trust

On behalf of my client, the Faberstown Trust, I write in response to the Council's public consultation on the Regulation 18 Stage 1 draft Local Plan 2040. This letter and supplementary appendices together respond to the Stage 1 draft of the Local Plan 2040, and to specific Assessments and Topic Papers published in support of it. The Stage 1 plan focusses on strategic matters including a spatial strategy for guiding the distribution of housing development, informed by supporting evidence. The Stage 2 plan to be published later this year will then include proposed site allocations and development management policies. As the outcome of the Stage 1 consultation will directly inform the content of the Stage 2 plan, it is necessary for us to again promote our client's proposed housing allocation site "East of Ludgershall" at this stage and to consider it in the context of the strategic approach taken in the draft Stage 1 plan.

Land East of Ludgershall

As detailed in previous promotional submissions since 2017, our client owns land which lies immediately to the east of the town of Ludgershall, within Test Valley. The site is on the edge of the town and abuts the administrative boundary between Test Valley and Wiltshire. The residential area of Faberstown lies to the immediate west and there is commercial development along the A342 Andover Road to the south – which itself is within Test Valley Borough.

The site has the capacity for about 350 new homes, and it is of a scale which can be delivered by a single housebuilder within 5 years. It is within walking distance of a wide range of local amenities in Ludgershall. It will be accessed from a new priority junction with the A342 Andover Road. The A342 forms part of the high

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frequency route of Stagecoach bus service 8 Salisbury to Andover which operates 7 days a week. The A342 also connects to the A303 dual carriageway at Andover.

The site has been promoted continually for development through the Council's SHELAA since 2017, then again in 2020 (refined Issues and Options consultation) and most recently in 2021 – where we prepared a "Vision" document and masterplan in response to your authority's latest Call for Sites. These are provided as **Appendix 1** and **2**.

The site is sustainably located, deliverable, and has no environmental / ecological / landscape or other constraints that would be a barrier to its development. Nevertheless, in the Council's latest SHELAA, it continues to be described as a 'countryside' site with no access to facilities, services or public transport provision. This misleading impression is due to the fact that the assessment disregards the site's location adjoining Ludgershall because the town lies outside of the Test Valley authority area.

This is an inconsistent approach, given the previous decisions of the Council to allocate land for housing development adjacent to other settlements outside of but immediately adjoining the Borough, such as Valley Park, Stoneham Park, Nursling and Rownhams. Further representations are made on this matter below.

Settlement Hierarchy Assessment (February 2022)

It is understood from the Assessment document that the review was in order to provide updated evidence on the sustainability of the settlements in the Borough. This is welcomed.

The previous Settlement Hierarchy – which was used to inform Policy COM2 in the TVBC Revised Local Plan (2016) – has not proved to be a successful basis for the spatial distribution of development. It placed an overreliance on settlements in the southern half of the Borough to accommodate major and strategic development, despite many of those settlements being unable to accommodate this. In the northern half of the Borough, strategic-scale development was focussed on Andover. Andover has been the subject of repeated and increasingly unsustainable strategic extensions to its east (Picket Twenty and Picket Piece) which are progressively further from the centre of Andover and its key services and facilities. These matters have already been highlighted in our response to your Refined Issues and Options consultation, in August 2020 (**Appendix 3**).

We suggested in those representations that Key Service Centres (as they were previously referenced in the settlement hierarchy) needed to be reviewed in terms of the availability of their services and facilities, job availability or ease of access to jobs beyond the settlement, and public transport. In addition, we

suggested that any future assessment should take the environmental constraints of each settlement into account. For example, both Stockbridge and Valley Park were defined as Key Service Centres. However, large areas of land around Valley Park are designated as a local nature reserve and SINC, whilst the river valley floor around Stockbridge is subject to flood risk and its Conservation Area is a valuable heritage asset with a sensitive setting. Similar constraints exist in Chilworth which is largely surrounded by areas of forest, woodland and common land covered by a number of nature conservation designations. Chilworth also has a limited range of key facilities. It is therefore clear that, while settlements may exhibit a higher level of facilities and services, it does not follow that they also provide opportunities for strategic growth because – in a number of instances – environmental constraints impose limitations on the ability of those settlements to expand further. This effectively renders unsound the use of the Settlement Hierarchy as a basis for guiding the spatial distribution of housing development between settlements.

The new Settlement Hierarchy Assessment (SHA 2022) has unfortunately maintained a similar approach. Indeed, the Topic Paper focuses even more on the number of facilities within each settlement, with 'key facilities' being identified as:

- Food store, such as a village shop;
- Outdoor sports facility, such as a playground or sports pitch;
- Village or Community Hall;
- Primary School;
- Public house or Social club;
- Place of worship; and
- A good level of public transport.

The result is that a similar list of settlements find themselves in Tiers 1 and 2 of the settlement hierarchy for the draft Local Plan 2040 as those in the settlement hierarchy for the previous, adopted Local Plan.

Romsey and Andover are the only Tier 1 settlements. It is accepted that they are clearly the largest towns in Test Valley with the greatest variety of services, facilities, access to employment and public transport provision. They naturally form Tier 1 settlements.

Tier 2, however, features the same settlements as those labelled 'Key Service Centres' in the previous settlement hierarchy, with the addition of Wellow, Hurstbourne Tarrant and Ibthorpe, and Shipton Bellinger.

In response to the Settlement Hierarchy Assessment (Feb 2022) and its outcomes, we have prepared a Settlement Hierarchy Review Paper (**Appendix 5**) which critically analyses the new proposed settlement hierarchy and makes recommendations for its amendment. This is important, given that the settlement

hierarchy has informed the proposed spatial strategy (discussed later in this letter) and it will inform decisions on proposed strategic site allocations which will be identified in the Regulation 18 Stage 2 plan.

Of primary concern is the continuing failure of the latest SHELAA to take into account that the town of Ludgershall lies against but immediately outside the Borough boundary. This is evidenced in the assessment of SHELAA Site no.61 – Land east of Ludgershall. The unsound assessment of my client's site is detailed below.

SHELAA 2021 – Land east of Ludgershall (Site 61)

Following our continued promotion of the subject site and its formal submission through the August 2021 'Call for Sites', Land east of Ludgershall has once again been assessed by Officers in the latest SHELAA. Whilst the SHELAA does not allocate sites for development, it does form an important part of the evidence base for the next Local Plan as it identifies which sites are developable, available and deliverable, and are therefore suitable to be allocated in the emerging plan.

My client's site is site 61 in the 2021 SHELAA. It is provided as **Appendix 4** to this letter, for reference. Unfortunately, and as with previous assessments, the site has not been assessed taking into account its geographical context. This is clear in the site summary, which is quoted in full below and reproduced at **Appendix 4**:

'The site is available and promoted for development by the land-owner, with interest from a developer.'

The site is located outside of the settlement boundary of the TVBC Revised Local Plan DPD. The site is adjacent to the town of Ludgershall which is located outside of Test Valley. The closest settlement to the site in Test Valley is Redenham which is identified as Countryside in the Local Plan Settlement Hierarchy.

Development away from the defined settlements is unlikely to meet all the elements of sustainable development considering access to a range of facilities.' (TVBC SHELAA 2021 – site 61.)

Curiously, it is acknowledged that the site lies adjacent to the town of Ludgershall, but the site is then assessed in terms of its relationship to the small village of Redenham (approximately 2km east of the site). The site is physically unrelated to Redenham and is clearly a potential extension to the town of Ludgershall.

Nevertheless, the SHELAA summary concludes by suggesting that the site is situated 'away from defined settlements' and is therefore an unsustainable location for development; lacking access to a range of facilities. This is not the case, and we would refer Officers to **Appendices 1, 3 and 5** – all of which demonstrate the sustainable credentials of Land east of Ludgershall.

Spatial Strategy Topic Paper (February 2022)

We have reviewed the Spatial Strategy Topic Paper (February 2022) and related text in Chapter 3 of the draft Local Plan in order to understand the proposed direction for growth and sustainable development in Test Valley.

It is noted that the plan is not proposed to include a policy which sets out the presumption in favour of sustainable development (paragraph 3.5 draft LP 2040), but instead will define what sustainable development looks like in Test Valley. This approach is welcomed. However, in order to be justified and effective, the plan should include targets for market housing and affordable housing and related strategic allocations of land which are sufficient to sustain housing delivery during the entire Local Plan period, and beyond.

Potential issues with deliverability of sites should also be accounted for in finalising housing targets. The strategic allocation at Whitenap (Romsey) has encountered significant delays in coming forward during the current Local Plan period. The draft Local Plan makes direct reference to this (para 3.11). Similar issues and delays in future Local Plans should – as far as possible – be avoided to reduce the risk of shortfalls in housing delivery. This is discussed further in the next section (*Housing Need*).

We welcome the preferred option, which is a hybrid of the following three approaches:

- **Option C** – Concentrating development at key economic or employment centres;
- **Option D** – Focussing development in the key towns of Andover and Romsey; and
- **Option E** – Supporting growth at the largest settlements in the borough (incorporating more urban and rural locations)

We consider that this approach is justified because the spatial strategy of the current and previous Local Plans has continually concentrated strategic scale development in the northern part of the Borough on Andover. Repeated strategic extensions to the east of Andover (such as Picket Twenty and Picket Piece) have been counter to sustainable development principles and have promoted a car-reliance for residents, given their distance from services and facilities in Andover town centre (being in excess of 3.0km from the

town centre). The new draft Spatial Strategy identifies a wider distribution of development than set out in the current Local Plan 2029 which is supported.

In further justifying the proposed spatial strategy, the Topic Paper and the draft Local Plan (at paragraph 3.21) recognises that rural areas are facing housing supply challenges, particularly around affordability. In this regard, we would again highlight that Ludgershall is a more affordable place to live than Andover, with lower average house prices. In the previous 12 months to March 2022, the average house price in Andover is £345,812, whilst the same period for Ludgershall was £259,891 (Zoopla, 2022). **The average house price in Ludgershall is therefore £85,921 cheaper than in Andover.** A housing allocation on the eastern edge of Ludgershall will therefore make a significant contribution to improving the affordability of housing in the northern and north-western part of the Borough.

Draft Local Plan 2040 – Regulation 18 Stage 1

We are grateful for the opportunity to comment on the high-level policies which are provided in the Stage 1 plan.

Regional Context and the Duty to Cooperate

Paragraphs 2.16 – 2.20 of the Stage 1 plan discuss the duty placed on local planning authorities to co-operate with neighbouring authorities on strategic matters that cross over boundaries. Figure 2.1 of the draft plan illustrates that Test Valley shares boundaries with 8 neighbouring local authorities.

The draft Local Plan endorses a coordinated approach to strategic issues, through cooperation with neighbouring authorities. At the most basic level, we consider that this should include the identification of opportunities and constraints which exist between neighbouring LPAs, particularly instances where settlements rely on services and facilities which lie outside administrative boundaries. This is not uncommon and is discussed further in **Appendix 5**.

Housing Need and Affordable Housing Delivery

The draft Local Plan expresses the importance of providing a range of homes that are fit for purpose and designed to meet the aspirations of different groups within the community, including a range of affordable homes. As touched upon earlier in these representations, housing affordability is a significant challenge facing the Borough. Therefore opportunities to improve affordability through the allocation of appropriate sites – such as our client's site – should be actively explored.

The Local Housing Need (LHN) for the Borough is derived from the standard method, at 541 dwellings per annum (dpa). However, the draft plan identifies that this number could change as a result of the variables used in calculating the standard method during the preparation of the Local Plan (paragraph 5.13). Nevertheless, the figure reflects the minimum need for the Borough. The full housing need figure during the plan period to 2040 is 10,820.

The LHN is, however, just a starting point and a higher housing requirement can be identified where there are good reasons to do so. One such example exists in the Planning Practice Guidance which states the Council may consider an uplift in the total housing figure to respond to affordable housing need.

The SHMA (January 2022) for Test Valley identifies an acute affordable housing need for both affordable/social rent and home ownership properties. This need is quantified as being 437dpa for affordable/social rent and 215dpa for affordable home ownership products. In short, there is a total affordable housing need within the borough for 652dpa. This figure alone is more than the Local Housing Need figure of 541 dpa. There is a severe need for affordable housing in Test Valley.

In recent years, Test Valley has delivered around 30% of all housing as affordable over the plan period (1,300 affordable dwellings against 4,300 dwellings in total), and therefore one can reasonably assume that a housing requirement of 541dpa would deliver around 163 affordable dwellings per annum. This leaves a shortfall of nearly 500 affordable homes per year against the identified need.

Despite this acute need, the Sustainability Appraisal for the draft Local Plan 2040 suggests that testing a higher level of housing need to help meet an identified affordable housing need was not considered a reasonable alternative because, "The output of the standard method for housing need and the outcome of the assessment of affordable housing need are not directly comparable figures. The need for affordable housing does not generally lead to a need to increase overall provision."

Whilst it is accepted that addressing affordable housing need is not as simple as increasing the provision of general needs housing to deliver this need, we do not believe that the Council are justified in simply reverting back to the LHN figure derived from the Standard Method.

The Borough has sustained housing delivery rates of between 800–1,000 dwellings per year since 2014/15 against a housing requirement of 588 dwellings per annum. It is therefore reasonable to assume that the market would be able to sustain a higher rate of housing delivery than 541dpa. As such, a higher housing requirement could be an effective way of boosting affordable housing delivery to meet the identified acute need.

This is not to say that it would be reasonable to expect the Council to meet this affordable need in full through an uplift to the housing requirement, as this would be unsustainable. However, to discount the identification of a higher housing requirement at this stage when it could be a viable option to partially meet the acute affordable housing need in the borough is very premature. We would urge the Council to reconsider this conclusion and undertake further evidence base work to understand:

- What level of housing provision could realistically be supported by the market over the plan period (this is clearly not capped at 541dpa);
- The impact that this would have on affordable housing delivery and addressing the identified need;
- Policy initiatives to boost affordable housing delivery, relative to market housing; and
- The environmental, social and economic impacts of a higher housing requirement in the context of the Sustainability Appraisal.

At present, the proposed strategy is not considered to be justified on the basis that reasonable alternatives have not been considered in light of the evidence (paragraph 35 of the NPPF).

Allowance should also be made within the LHN figure to account for issues likely to be encountered with deliverability of some sites, and construction supply chain issues in recent years since the COVID-19 pandemic. This is touched upon in Paragraph 5.28 of the draft Stage 1 plan, which identifies the risks and hurdles associated with the delivery of housing, and the mechanisms required to manage such risks. An allowance for additional housing over and above the LHN figure is one such mechanism that we would endorse.

Strategic Policy 6 and Table 5.2 of the Stage 1 plan identifies that housing need is more acute in the north of the Borough based on the Strategic Housing Market Assessment. The north is therefore set to deliver 57% of the homes needed in the Borough (10,820 homes) over the plan period, totalling 6,167 homes. When account is taken of committed current supply totalling 6,367 homes, this leaves a residual requirement for the Borough of 4,453 homes, of which 3,505 homes (over 78%) must be delivered in Northern Test Valley.

Land East of Ludgershall provides an important clear opportunity to contribute to this figure, given that it is a site of such scale (350 homes) that can be delivered by a single housebuilder within 5 years, and in a location which can make a significant contribution to improving affordability in the northern part of the Borough outside Andover.

Transport and Movement

The draft Local Plan seeks to encourage active and sustainable modes of transport and reduce the impact of travel by private car. We suggest that this approach is insufficiently ambitious, and that the Council should additionally seek to reduce *the number of private vehicle journeys* by households, not just their impact. Paragraph 2.60 identifies that some rural areas in the Borough have an under-provision of access to public transport. This is not the case for Ludgershall, which benefits from high frequency bus services between Andover and Salisbury.

As touched upon in Paragraph 2.63 of the draft plan, we agree that the best way to increase demand for new sustainable transport modes and services is by locating new development in sustainable locations which already benefit from reasonable bus routes. This can enable providers to upgrade and increase provision through improved demand for services.

Summary and Recommendations

This letter and its appendices form our response to the Regulation 18 Stage 1 draft Local Plan 2040.

As detailed, we consider that the proposed Settlement Hierarchy, Spatial Strategy and defined housing target will fail to meet the housing needs of the Borough including its affordable housing needs. We are concerned that the proposed Settlement Hierarchy as drafted is an unsound basis for a spatial strategy, as alternative sustainable options are currently being overlooked and insufficient strategic allocations of land will be identified due to environmental capacity constraints at a number of the higher tier settlements in the Hierarchy. The Settlement Hierarchy should take into account the extent to which land around settlements is constrained by restrictive designations in reaching conclusions regarding the suitability of each settlement for strategic allocations of land for development.

We have also highlighted the anomalous way in which our client's site East of Ludgershall has been assessed in the Council's SHELAA; assessed in relation to the small village of Redenham some 2km east, but not to the town of Ludgershall which it directly abuts. This contrasts with previous residential allocations at Valley Park, Stoneham Park, Nursling and Rownhams.

On this basis, the following recommendations are made:

Recommendation 1: that the Council, in determining its Local Housing Need figures, takes account of the acute levels of affordable housing need in the Borough, of the affordability of housing and customer choice in the housing market across the Borough, of the Council's consistent recent delivery of 800 – 1,000

dwelling completions per annum, and of potential future issues relating to site deliverability and build-out rates especially for any potential large strategic allocations similar to Whitenap. The allocation of a mix of site sizes, rather than heavy reliance on one or two very large site allocations, is strongly recommended to improve the certainty of delivery; an uplift in the housing target to improve affordable housing delivery is also strongly recommended; and site allocations should include locations which will improve affordability in the local housing market.

Recommendation 2: that the new Settlement Hierarchy should take environmental constraints around settlements into account in guiding the spatial distribution of development; and that the availability of services and facilities in all settlements outside but adjoining Test Valley's administrative boundary (so including Ludgershall) should be taken into account.

Recommendation 3: that the Council's SHELAA should be amended in relation to Site 61: Land East of Ludgershall to properly reflect the accessibility of that site to services and facilities in Ludgershall and to the high frequency bus route between Salisbury and Andover.

I look forward to continuing to contribute to the preparation of the Local Plan 2040 and to discussing the potential allocation of Land East of Ludgershall in the Stage 2 draft plan.

Yours sincerely,



Jeremy Gardiner

Senior Director (Planning)

Email 

Encs.

Appendix 1 – Vision Document (2021), Pegasus Group

Appendix 2 – Illustrative Masterplan (2021), Pegasus Group

Appendix 3 – Refined Issues & Options Consultation response 2020, Pegasus Group

Appendix 4 – SHELAA Site 61 Assessment 2021 (Land east of Ludgershall), Test Valley Borough Council

Appendix 5 – Settlement Hierarchy Assessment Review Paper 2022, Pegasus Group