



08 April 2022

Our Ref: OJ/18.254

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

Dear Sir/Madam

Draft Local Plan - Regulation 18 Stage 1

I am writing on behalf of Hallam Land Management Limited.

Hallam has previously responded to the Issues and Options Consultation in 2018 and the Refined Issues and Options Consultation in 2020. In those previous representations we have drawn attention to the suitability of Andover in accommodating new development in this emerging Local Plan and its plan period.

Hallam has also responded to the various Call for Sites Exercises over recent years and has prepared and submitted a Vision Document drawing attention to the opportunity that exists at Littlebridge to provide a sustainable mixed use development. That material remains relevant to this current consultation response and for convenience has been included as Appendices so as to not to repeat information unnecessarily.

This present consultation identifies a number of policy areas that the Council intend would form part of the Local Plan and we comment on these in the following sections.

Vision and Strategic Priorities

We agree that the Local Plan should ensure that there is access to good quality homes that meet a range of needs and aspirations.

The Government's Standard Method for calculating a Local Authority's housing requirement suggests that 540 new homes need to be built in Test Valley each year. We agree that the Local Plan should aim to meet this need in full; we do not believe there are exceptional circumstances to warrant any reduction. Indeed, as the consultation document refers, the strength of housing demand locally is evidenced by the higher rates of development experienced over recent years following adoption of the Local Plan.

Moreover, it is possible that neighbouring authorities within the local sub-regions may not be able to meet their identified needs giving rise to unmet need that could be accommodated within Test Valley.

That is a matter the Council will need to consider as part of the statutory Duty to Co-operate and the required Statement of Common Ground.

We agree with the importance afforded to the future consideration of climate change. This requires measures to reduce climate change and adapt to its effects. The Climate Change Act 2008 as amended obliges the UK Government to bring all greenhouse gas emissions to net zero by 2050. 'Net zero' refers to achieving an overall balance between emissions produced and emissions taken out of the atmosphere.

It is widely accepted that CO₂ emissions from transport contributes to climate change. In this context, the land-use planning system - and this Local Plan - has a particular role in ensuring that the location of new development contributes to the principle of reducing the need to travel so as to reduce emissions.

This will require a distribution of development that is focused at the District's large settlements where there is a wide range of facilities and services and employment. It is unanswerable the Andover represent the most sustainable settlement within the plan area and should be the focus of new development.

We disagree therefore with the suggestion that the Local Plan should have a more dispersed pattern of development as this would increase, rather than reduce, travel. We discuss this further in relation to the Spatial Strategy in the following section.

In addition, the ability to achieve nature-based solutions to a range of environmental considerations and adaptation to climate change, including biodiversity net gain, can be better achieved at a large scale as compared to a number of smaller and more dispersed proposals. In such instances, a comprehensive green infrastructure strategy can be devised and implemented and importantly monitored and managed and maintained when this is part of a large-scale proposal.

Taken together, **these important considerations suggests that strategic scale development at Andover should remain part of the Local Plan's strategy in order to meet a number of its strategic priorities.**

Spatial Strategy

As the consultation document acknowledges, Andover and Romsey stand out as the most sustainable settlements, each with a full range and number of services and a high level of accessibility by public transport (emphasis added). This analysis is entirely consistent with the submissions made in 2018 as regards the suitability of Andover.

Andover is an important urban area which provides a range of services and facilities. It benefits from bus and rail based public transport and is astride the strategic A303 corridor.

The consultation document also rightly acknowledges that the pattern of new development will enable the prioritisation of walking, cycling, and use of public transport to minimise the need for unnecessary travel by car. This is an approach which is entirely consistent with the NPPF which identifies that:

- the planning system should actively manage patterns of growth in support of sustainable transport objectives.
- significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.
- planning policies should support an appropriate mix of uses across an area and within larger scale sites to minimise the number and length of car journeys needed for employment, shopping, leisure, education and other activities.



In this context, large scale development adjacent to Andover can play an important role in delivering this spatial strategy; it allows for an internalisation of trips, walkable neighbourhoods and investment in active travel and public transport to the town centre and other key destinations. The proximity of new development in the south of the town to established employment locations underscores this approach.

As has been identified in previous submissions, Andover has always been a very self-contained settlement reflecting the balanced development of housing and employment. A dispersed approach to growth could have the effect on undermining this equilibrium.

Concentration of development at Andover also ensures that the built, historic and natural environment in other, more sensitive and rural parts of the District are conserved. In particular, Romsey is a historic market town and whilst there are existing commitments at the town the extent to which it can continue to grow and expand is limited by its environmental characteristics and constraints.

It is evident therefore that **Andover should be afforded a greater strategic significance than Romsey in the new Local Plan because it is less constrained than Romsey and is better able to accommodate new development.**

The above considerations give rise to **a spatial strategy that is more, not less, concentrated on the District's main settlement – Andover.**

As such, the current delineation of the housing market areas may require adjustment so that new housing can be directed to the locations best able to accommodate new development in a sustainable manner.

Equally, Andover is well positioned in terms of its relationship to other large settlement, both in the South Hampshire area and also the east-west corridor including Basingstoke – Hart – Rushmoor. In this regard Andover could play a greater sub-regional role. Indeed, Andover's historic role has been to fulfil this sub-regional role.

As set out in previous representations, **Littlebridge provides the opportunity to accommodate a large-scale mixed use development in a sustainable manner**, than can complement the regeneration of the town centre.

Strategic Policy Framework

Each Local Plan must set out its Strategic Policies. The scope of these are defined in paragraph 20 of the NPPF.

Strategic Policy 1: Countering Climate Change. We agree that the Local Plan should take the opportunities to maximise the potential for active and sustainable travel and minimise unnecessary travel – this naturally leads to a greater concentration of new development at Andover. Moreover, large scale development provides the opportunity for a range of adaptation measures to avoid the effects of climate change.

Strategic Policy 2: Delivering healthy, well-designed development. Previous submissions made in respect of Littlebridge have illustrated the extent to which large-scale development in this location can be designed to achieve these listed objectives.

Strategic Policy 3: Delivering development and regeneration in Andover and Romsey town centre. Continued growth at Andover beyond the existing Local Plan allocations will afford a continued momentum to the regeneration initiatives, providing a growing population to support its vitality and



viability. Development on the edge of the town, but well-related to it and connected by active and sustainable travel, will complement the town centre masterplan.

Strategic Policy 5: Delivering Infrastructure. New development will give rise to additional infrastructure requirements. Such investment can also benefit existing residents and achieve wider objectives, for example, new pedestrian and cycle routes or improvements in public transport that are facilitated by major development will also support changes to travel behaviour for existing residents. This is an important consideration in where best to locate new development.

Strategic Policy 6: Housing Provision. The consultation document identifies the residual housing and employment needs across the District as a whole. It is widely understood that whilst a priority should be afforded to the use of previously developed land, future development needs cannot be met solely on such land, and the need for greenfield development is a legitimate approach in this context and the importance of a sustainable pattern of development is of particular significance. For the reasons given previously, maintaining the partition between north and south may no longer be appropriate and certainly the proportionate split needs to be amended to take account of, firstly, the constrained nature of Romsey and, secondly, the greater potential and future role of Andover.

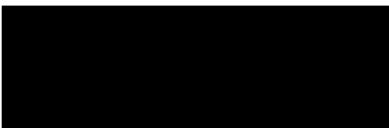
As such, a greater scale of development and proportion of the residual requirement in Table 5.3 should be directed to Andover.

In respect of employment, we infer from Tables 5.4 and 5.5 that there is a need to provide some 3.15 hectares of land for B1a/b uses and 47.25 hectares of land for B1c/B2/B8 uses in Northern Test Valley. **Plainly, sustaining the economic vitality and role of the node along the A303 is an important strategic priority. Given the success and momentum achieved at Andover Business Park, continuing with south-western growth of the town is eminently sensible. Littlebridge is well suited to contributing towards growth in that broad location and benefits from existing travel corridor to the town centre via Salisbury Road.**

Littlebridge

In the context of the above representations, we propose a mixed use allocation at Littlebridge. Given the evidence of employment need we have considered how Littlebridge could contribute towards this, and the attached plan at Appendix 5 illustrates a further option for a mixed use development with an enlarged area for employment. We would welcome the opportunity to discuss this with you and in particular the balance of land uses.

Yours faithfully,



Owen Jones
Director

Appendix 1: Response to Issues and Options September 2018
Appendix 2: Response to Refined Issues and Options August 2020
Appendix 3: Littlebridge Vision Document 2018
Appendix 4: Call for Sites Response 2021
Appendix 5: Site Wide Concept Plan April 2022



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