

## Test Valley

# Draft Local Plan 2040 – Regulation 18 Stage 1

Representation on behalf of Peel L&P Investments (North)  
Limited

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Authors: Graham Lamb & Kerry Walker

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## Document Management

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# Contents

1. Introduction.....	3
2. Site Context and Proposed Development.....	6
3. Andover Settlement Analysis.....	10
4. Economic Growth in Test Valley.....	23
5. Introduction, Vision, Key Challenges and Objectives (Chapters 1 & 2).....	26
6. Spatial Strategy (Chapter 3) & Andover Settlement Analysis.....	30
7. Strategic Policy Framework (Chapter 4).....	32
8. Meeting our Needs (Chapter 5).....	35
9. Conclusions.....	45

# Appendices contents

- Appendix 1: Summary Development Framework
- Appendix 2: Landscape Statement
- Appendix 3: Preliminary Ecological Assessment



# 1. Introduction

- 1.1. Pegasus Group are instructed by Peel L&P Investments (North) Limited ('Peel') to make representations to the 'Draft Local Plan 2040 - Regulation 18 Stage 1 Consultation', which ran from 11<sup>th</sup> February to 8<sup>th</sup> April 2022.
- 1.2. These representations follow on from those previously submitted by Peel, also prepared by Pegasus Group, in response to the 'Next Local Plan - Refined Issues and Options Consultation' (August 2020) and the 'Issues and Options Consultation for the next Local Plan' (September 2018). These previous consultations were more informal in nature, with the current document representing the first formal Regulation 18 consultation.
- 1.3. We also reiterate our support for this Local Plan Review, and the Council's proactive approach in starting the review process back in September 2018 when 5-year review requirement (as per paragraph 33 of the NPPF) did not kick in until early 2021. This process has obviously taken longer than originally anticipated, and also included a 'Five Year Review'<sup>1</sup> that was endorsed by Council's Cabinet in March 2021, which found that the strategic policies in the adopted plan were still sound and did not need updating.
- 1.4. That said, the 'Five Year Review' made it clear that a new Local Plan was still being prepared and that it would inform how the plan moved forward, a position we wholly support, to ensure that ongoing development needs are met, particularly beyond 2029 when the current plan expires, and that policies remain in line with national policy and strategic growth priorities.
- 1.5. To achieve this, it is critical that the emerging plan maintains the timeline set out in the latest Local Development Scheme below, as signed off by the Council's Cabinet on 29<sup>th</sup> September 2021 with adoption date in late 2025, as this would already comprise a 7-year process, which leaves just 3.5 years of the adopted plan period, where the housing supply is due to dip significantly:
  - Consultation on Regulation 18, Stage 1 (2022 Q1) (current stage).
  - Consultation on Regulation 18, Stage 2 (2022 Q4).
  - Consultation on Regulation 19 (2023 Q4).
  - Submission (2024 Q3).
  - Examination (2024 Q4).
  - Adoption (2025 Q3).

## Peel's Land Interests & Proposed Development

- 1.6. Peel have legal control of c. **52.6 Ha (130 acres)** of agricultural land at Bere Hill, to the south east of Andover, and are seeking to promote it for residential development through the emerging Local Plan process for 700 + units. The full extent of the site is illustrated overleaf..

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<sup>1</sup> Also known as a footnote 39 review in the 2021 NPPF.

- 1.7. We provide more detail on the proposed development within the Summary Development Framework (October 2019) attached at **Appendix 1**. This document ultimately demonstrates that the site is entirely suitable, available and achievable for residential development.
- 1.8. We also provide the following technical reports:
- Landscape & Visual Statement prepared by Pegasus Group (May 2019) – **Appendix 2**; and
  - Preliminary Ecological Assessment prepared by TEP (Ref: May 2019) – **Appendix 3**.
- 1.9. Please note, all 3 of these appendix documents have been submitted previously to the Refined Issues and Options Consultation in August 2020 and the SHELAA process, but are reattached for comprehensiveness, given this forms the first formal Regulation 18 consultation.
- 1.10. It is also pertinent that Peel has an established housebuilding arm, Northstone<sup>2</sup>, which allows Peel to open up sites ensuring immediate delivery working with partners, rather than simply being a promoter. This also allows them to partner up with Registered Providers earlier in the process if required, to ensure delivery of the required levels of affordable housing.

Figure 1.1 – Peel Ownership



- 1.11. To clarify, details of this site have previously been submitted to the following ‘call for sites’ processes:
- **2014 SHLAA (Site ref: 198)** – for up to 1,000 units across a larger 111 Ha (274 acres) site; although it was not allocated within the adopted Local Plan (2016).

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<sup>2</sup> [www.northstone.co.uk](http://www.northstone.co.uk)

- **2017 SHELAA (Site ref: 247)** – for up to 700 units, across the current 52.4 Ha (129 acres) site (of which 18.9 Ha (47 acres) was considered deliverable). This concluded that change in policy would be required to allow the site to come forward.
- **2019 SHELAA (Site ref: 247)** – for 700 + units. The submission was accompanied by the attached Summary Development Framework which confirms that the site is entirely suitable to deliver this amount of residential development.
- **2021 SHELAA (Site ref: 247)** – for 700 + units, with an assumed delivery rate of 50 dph with commencement in year 3 (we noted this delivery rate was conservative but acceptable at this stage). We also provided approximate distances to key destinations by various modes, demonstrating that it is a highly sustainable site within easy walking distance of the Town Centre, schools, convenience stores and bus stops.

1.12. As such, we continue to promote this site on the basis of 700 + dwellings, which we have shown to be entirely achievable as demonstrated in the Summary Development Framework enclosed at **Appendix 1**. 700 dwellings should be viewed as the minimum figure on site, as recent technical work undertaken is based on 750 dwellings, and confirms no issues with this development capacity.

### **Representation Structure**

1.13. The remainder of this report follows a similar structure to our previous representations, by first setting out the context of the Bere Hill site, Andover as a settlement and economic trends across Test Valley; before addressing the chapters and draft policies of the plan in turn.

1.14. Accordingly, the report is structured as follows:

- In **Section 2** we describe the site, its surroundings and the proposed development in more detail;
- In **Section 3** we provide an updated settlement profile of Andover, and its recent and projected housing growth;
- In **Section 4** we look at economic growth within Test Valley in recent years, and how this compares with the Council's draft plan and evidence base;
- In **Section 5** we comment on Chapter 1 'Introduction' and Chapter 2 'Vision, Key Challenges and Objectives';
- In **Section 6** we comment on Chapter 3 and the proposed 'Spatial Strategy' focussing on Andover's role in the settlement hierarchy, with reference to section 3.
- In **Section 7** we comment on Chapter 4 'Strategic Policy Framework';
- In **Section 8** we comment on Chapter 5 'Meeting Our Needs' which includes a detailed review of the draft housing policies; and
- In **Section 7** we summarise and conclude our representations.

## 2. Site Context and Proposed Development

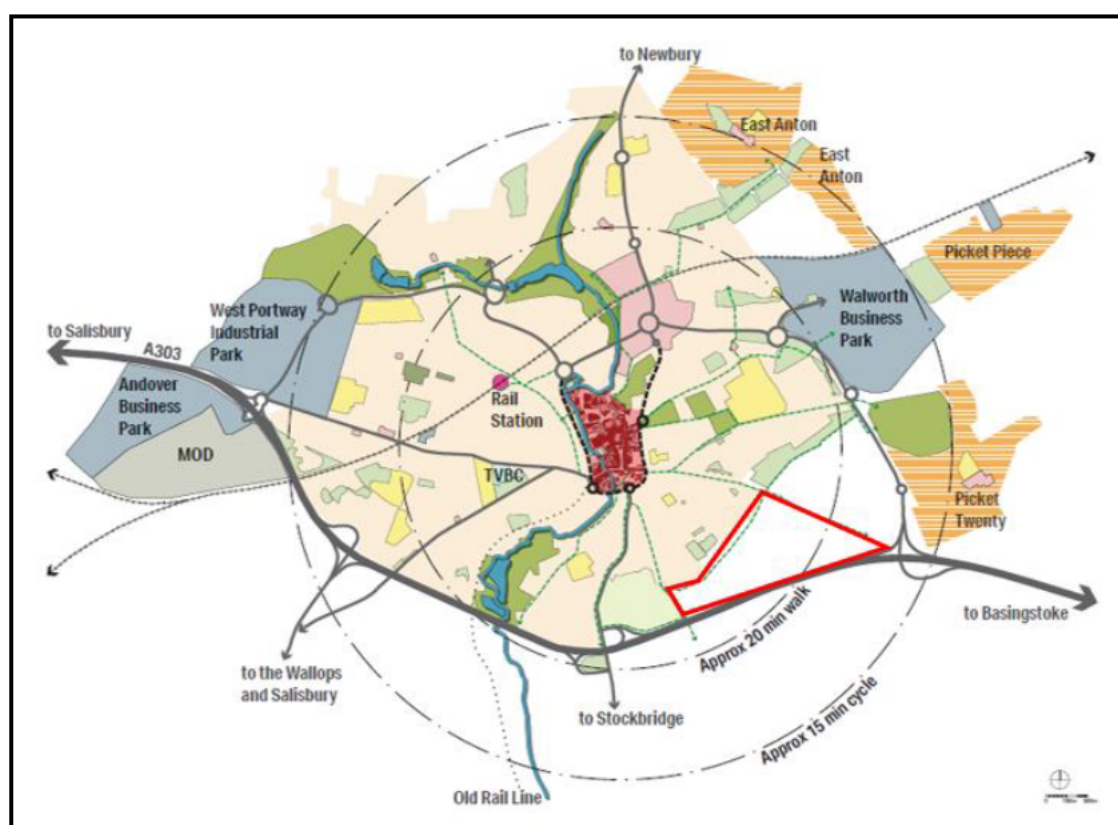
### The Site and Surroundings

- 2.1. As noted in section 1, and set out in more detail in **Appendix 1**, the site comprises c. 52.6 Ha (130 acres) of agricultural land at Bere Hill, adjoining the built-up area to the south of Andover, to the north of the A303 Andover Bypass, and designated as countryside in the adopted Local Plan (dated 2016) under policy COM2.
- 2.2. The site is bound by existing residential development to the north, the A303 Andover Bypass to the south, Andover Golf Club to the west, with a small complex of residential dwellings called the Grange, surrounded by agricultural fields to the east. The field to the north of the Grange is being promoted for development by L & Q Estates Ltd (formerly Gallagher Estates); with the field to the south (known as Bailiffs Bottom) owned by the Council. The Picket Twenty residential development is further east beyond the A3093 road.
- 2.3. In terms of access, the site connects with Micheldever Road to the north east and Old Winton Road to the north west; there are two PRowS crossing the site (one running north south and one east west past the existing Bere Hill Farm) and one, Ladies Walk that traverses the northern boundary, and is lined with a thick stand of mature trees creating a key local recreation feature.
- 2.4. Whilst the land is slightly elevated from the main settlement to the north, topography within the site is relatively flat and perfectly developable for residential dwellings, and the thick tree stand around Ladies Walk provides a large amount of visual containment, screening the site from the key views southwards from the town, and preserving the effect of the 'Andover Bowl'. The tree cover towards the southern boundary of the site along the A303 has also matured and provides effective screening in this direction too.
- 2.5. Furthermore, the landscape and visual analysis contained in the Summary Development Framework notes that despite being above the 90m contour, the unique situation of the site in terms of its topography, surrounding landform, and strong existing vegetation framework presents a site that could be delivered with minimal effects on landscape character or visual amenity.
- 2.6. The site is not in a Flood Risk Zone and is not subject to any statutory or local environmental designation. There are some sites of local nature importance (SINCs) and TPOs adjacent to the site, but these can be incorporated into the development without any impact. The agricultural land classification for the site is predominantly Grade 3a, however this is the case for all the land around Andover.
- 2.7. In terms of ecology, TEP have undertaken a Preliminary Ecological Assessment, as summarised in the Summary Development Framework. The technical work confirms that the development of this site will not impact upon any statutory or non-statutory designated sites. Furthermore, the site does not contain any ponds or other key habitat features and is instead characterised by habitats of low ecological value including arable fields and semi-improved grasslands, with higher value hedgerows and woodland largely retained. Further ecology surveys will be required in support of any future planning application, to include some or all of the following - bats, reptile, dormouse, nesting birds and pre-construction checks for badgers. It is also important to note that Peel have also already instructed wintering bird

surveys which have now been completed. The PEA report ultimately concludes that there are no ecological or arboricultural constraints preventing the development of the site.

- 2.8. In heritage terms, whilst there is a Grade II Listed Iron Bridge immediately bordering the site to the north, this can be integrated with the development with minimal impacts, and there are no other Listed Buildings or other heritage designations within or adjacent to the site.
- 2.9. The site is located in a very sustainable location within 900m of Andover Town Centre, which includes five supermarkets, a range of other national retailers, a Leisure Centre, College and various office and employment developments. There are also 2 doctor's surgeries on the edge of the Town Centre and a hospital within 2.5km.
- 2.10. The sustainability of the site, and compact nature of Andover as a whole in terms of accessibility is well demonstrated within the Council's Town Centre Masterplan (adopted September 2020)<sup>3</sup>, which shows that the majority of the site is within the 20 minute walking catchment. It is also pertinent that this forms the one of very few undeveloped areas within this catchment, even though there has been significant residential development beyond this, and even beyond the 15 min cycling catchment, through the East Anton, Picket Piece and Picket Twenty allocations.

Figure 2.1 – Andover Sustainability Plan



- 2.11. Furthermore, there are two convenience stores within 350m of the site which are accessible by foot; whilst Walworth Business Park, a major employment area, is just 1km to the north east.

<sup>3</sup> Plan showing 'A compact town' page 17, Andover Town Centre Masterplan (September 2020)



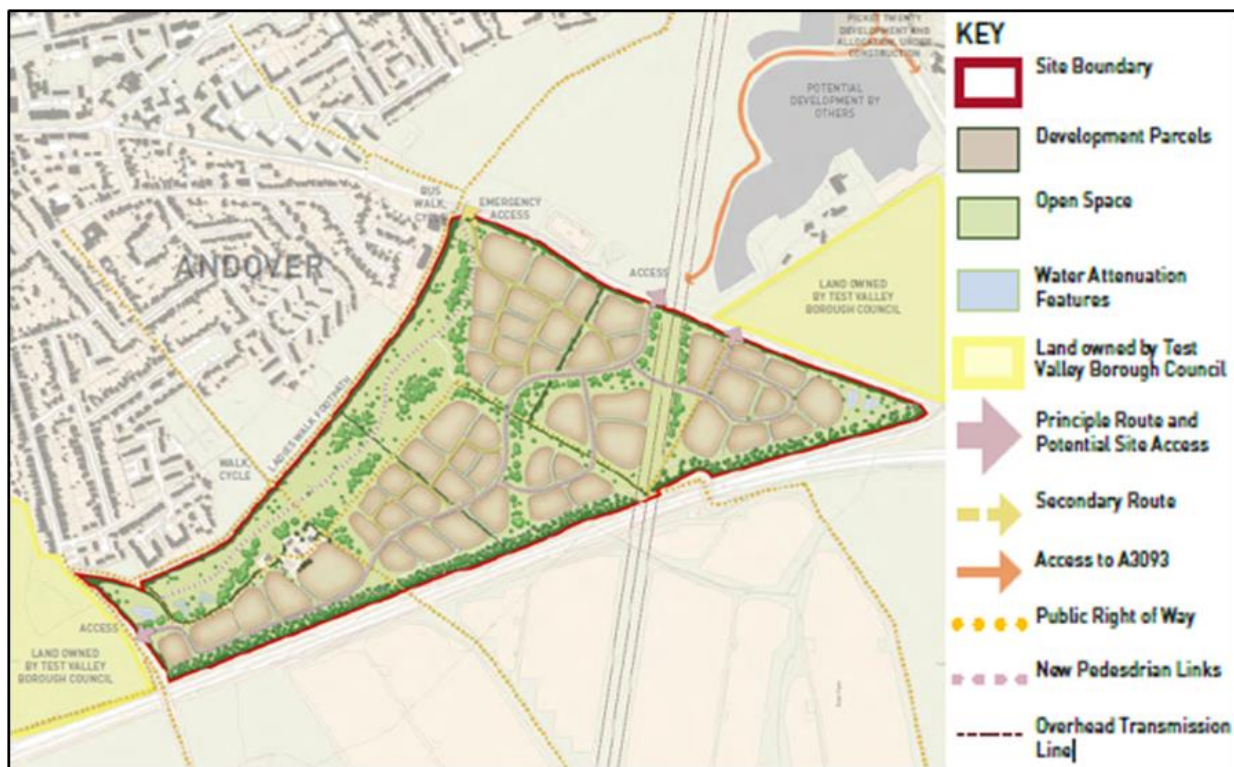
In respect of education, there are a total of 6 schools within 1.5km of the site and 20 within 5km.

- 2.12. The nearest Railway Station to the site is Andover, which is approximately 2.2 km to the north west of the site and provides direct services to London and other major towns; whilst the bus stops on Leigh Road and Shepherds Row within 350m of the site, offer localised services between Andover and its suburbs.
- 2.13. The site therefore benefits from a highly sustainable location in relation to Andover’s existing facilities and services.

### Proposed Development

- 2.14. As explored in detail in the Summary Development Framework, Peel are promoting this site for allocation within the emerging Local Plan for a minimum of 700 units, with the capability to provide in excess of this. The plan below presents the latest scheme for the site.

Figure 2.2 – Illustrative Masterplan



- 2.1. As noted in section 1, in addition to their traditional role as a promoter, Peel also has the ability to enable immediate delivery of this site themselves through their housebuilding arm, Northstone, working with partners; thus providing a guaranteed end user for the site if required, which boosts the deliverability credentials of the site. This could also allow Peel to partner up with a Registered Provider at the outset, if required, to ensure delivery of the required levels of affordable housing.
- 2.2. The masterplan focusses the development on the southern and eastern sections of the site to avoid the higher ground to the north west and to provide a generous buffer to Ladies Walk footpath and the Iron Bridge. This also ties in with the development proposed by L & Q

Estates on the land to the north east, and the land owned by the Council to the east and west, and therefore offering an integrated design across the wider area.

- 2.3. This illustrative plan, which will be subject to review and refinement over time, shows a net developable area of approximately 20 Ha (49 acres), giving net densities of 35 dph. The development will have a clearly legible hierarchy of streets providing connectivity and access to local facilities.
- 2.4. SCP Transport have prepared an Access Assessment which has fed into the Illustrative Masterplan. Suitable primary vehicular access into the site can be taken from one of the three options, noted below and as shown above:
- Via the A3093 to the east, through Council owned land and via the existing Picket Twenty roundabout which has an available arm allowing direct connection;
  - Via the A3093 to the east, via a new roundabout proposed to serve the Grange Development (to north of existing roundabout/ Council land); and
  - From Winchester Road to the west through Andover Golf Club (owned by Test Valley Borough Council), via a priority junction with right turn ghost lane.
- 2.5. All three of these accesses are achievable, but only one is required to serve the site on capacity grounds, subject to suitable internal access loops, which are included on the Illustrative Masterplan. Secondary and emergency access is proposed through Micheldever Road to north, with associated pedestrian and cycle connections to Ladies Walk and the wider footpath network.
- 2.6. A full consultant team has been appointed to investigate a range of environmental and technical matters, and further reports and detail will be submitted to the Council as the Local Plan process progresses. This includes additional work on highways, landscape and ecology which have been undertaken and as summarised in the October 2019 Summary Development Framework (with the Landscape and Ecology reports attached at **Appendices 2 & 3** respectively). In particular, the Illustrative Masterplan has been very much influenced by the landscape and visual analysis undertaken for the site, which has identified the most sensitive areas in landscape terms and has informed the extensive landscape buffer in the north of the site.

### 3. Andover Settlement Analysis

3.1. This section updates the settlement profile of Andover which we have included within our previous representations to provide some context around our site proposals at Bere Hill, and includes reference to the Council’s Settlement Hierarchy Paper (February 2022) which we revisit in section 6.

#### Andover’s role within Test Valley

3.2. Andover<sup>4</sup> is the largest settlement in Test Valley and is located in the north of the Borough. It had an estimated population of 40,504 in 2011, which increased to 48,350 in 2020. This equates to growth of 7,846, or 19.4%. In comparison, Test Valley saw its population increase by 10,500 (9%) between 2011 and 2020, from 116,700 to 127,200. Andover’s growth was therefore significantly higher than the Borough’s and the area now accounts for 38% of Test Valley’s population. Furthermore, it is expected to grow a further 10% towards 55,000 by 2026, according to the Andover Town Centre Masterplan.

3.3. Andover has direct train access into London Waterloo and the A303 Andover Bypass also forms a direct road route to London via the M3, making it an attractive commuter location. It is also close to the A34 trunk road which connects the south coast ports of Southampton and Portsmouth with the Midlands, via the M40. It is within a 30 minutes’ drive of more than 50,000 business sites and 520,000 people including 380,000 of working age.

3.4. Andover has a resident workforce of about 27,000, reflecting the Borough’s high economic activity rate participation in the labour market of 82%. Much of the employment is concentrated on the business parks, close to the strategic road network. Major employers include the MoD, Stannah Stairlifts, Le Creuset, Abel & Cole and Ocado. Andover also has numerous smaller businesses, and many new businesses are growing in Andover’s Enterprise Centres at Basepoint (East Portway) and Walworth<sup>5</sup>.

3.5. Andover’s high level of sustainability is acknowledged in the Council’s Settlement Hierarchy Paper (February 2022). Paragraph 4.2 of the Paper outlines how Andover and Romsey stand out as being the most sustainable settlements in the Borough, with a full range of services and a high level of public transport accessibility. It is then noted how there are no other settlements within the Borough which offer such a complete range of facilities, with good access to jobs, key services and infrastructure. This position is summarised in Table 2, extract below.

Figure 3.1 – Facilities in Andover

Settlement	Key facilities	Other facilities	Public transport
Andover	6	17*	H
Romsey	6	16*	H

\* Denotes Superfast Broadband

<sup>4</sup> Andover is defined as the following 2019 electoral wards: Andover Downlands; Andover Millway; Andover St Mary’s; Andover Harroway; Andover Romans; and Andover Winton. This is consistent with the definition used in Andover Town Profile 2021, produced by Test Valley Borough Council.

<sup>5</sup> According to the Andover Town Centre Masterplan (September 2020).

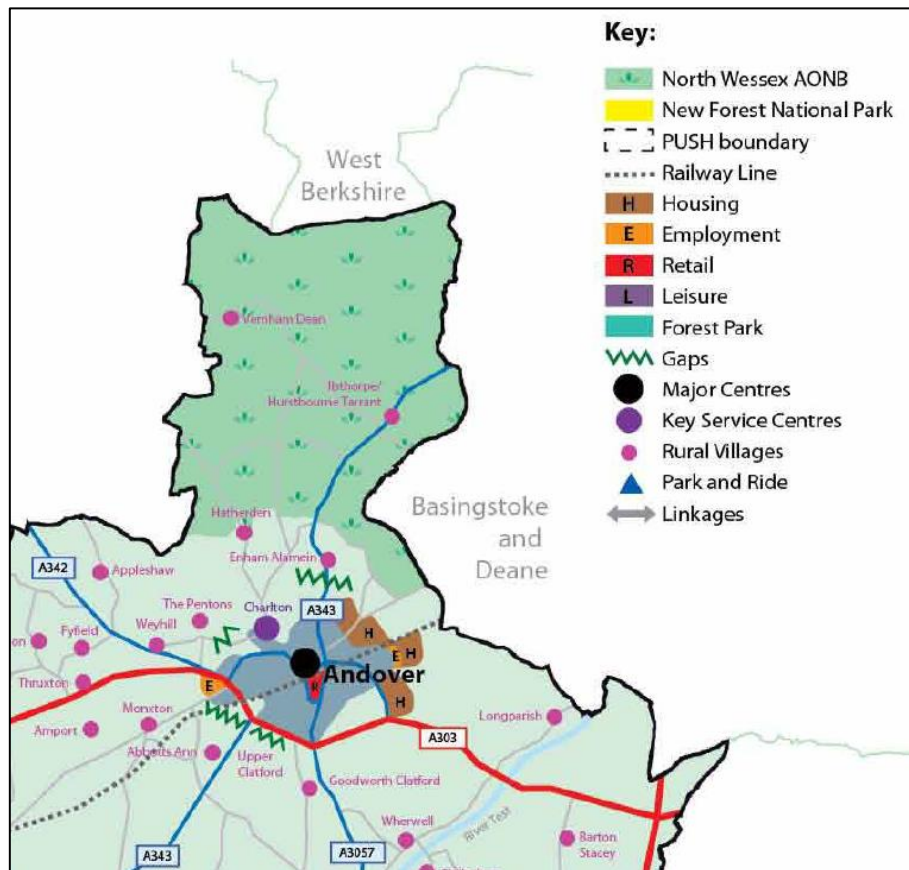
- 3.6. As a result, Andover and Romsey remain in the top tier of the settlement hierarchy (now referred to as Tier 1 settlements) as they are in the adopted plan (where they are referred to Major Centres).
- 3.7. However, it is worth reiterating here that Andover is the dominant settlement in the Borough, as this is not completely clear from the table above or the fact they occupy the same settlement tier in the adopted and emerging plan. Indeed, Romsey is less than half the size of Andover (estimated at 20,549 in 2020), although it does form a wider urban area in the south of the Borough with several smaller settlements classed as Key Service Centres/ Tier 2 Settlements (Chilworth, North Baddesley, Nursling & Rownhams and Valley Park); whilst the remainder of the Borough is made up of small rural villages.
- 3.8. The Council employ a split housing requirement for Northern and Southern Test Valley and have done since the 1980's reflecting the different housing market areas, as Southern Test Valley, which comprises the urban area around Romsey and surrounding villages, has a close relationship with the South Hampshire sub-region and is included in the Partnership for South Hampshire (PfSH) SHMA; whilst Northern Test Valley (i.e. the remainder of the Borough further north) is more of a self-contained Housing Market Area centred around Andover.
- 3.9. The Adopted Local Plan directs 67% of housing growth to Northern Test Valley, of which 90% is apportioned to Andover itself (so approximately 60% of the Borough total), based on job forecasts and to allow Andover to support new retail and leisure facilities.
- 3.10. That said, we note the current consultation proposes to change the boundaries and housing split of the two HMAs, increasing the area and associated apportionment of Southern Test Valley, and we comment on this in more detail in Section 8.
- 3.11. Overall, this demonstrates that Andover is the dominant settlement and employment centre within Test Valley, and the only significant settlement within Northern Test Valley. It has a fast-growing population and as such it is the obvious focus for further growth.

### **Growth within Andover**

- 3.12. In terms of existing growth and development patterns within Andover, the key diagram from the Adopted Local Plan provides a useful overview of the existing position and expected growth up to 2029.
- 3.13. In headline terms this shows a large urban area, with the retail core slightly to the south of centre, the A303 bypassing the town to the south and the railway line running through the centre. The Key Service Centre of Charlton abuts the town to the north west, with several smaller rural villages just beyond to the west and south west (including Penton Mewsey and Upper Clatford), with fairly small levels of separation. There are protected local gaps to maintain separation to the south west, north west and north. Notably, the Bere Hill site is not located within a protected local gap.
- 3.14. The land surrounding the urban area is designated countryside (under Policy COM2) with some Sites of Importance for Nature Conservation (SINCs) to the south, beyond the A303, and to the south east, beyond the existing residential development at Picket Twenty.
- 3.15. Beyond the Town Centre there are key employment locations at West Portway Industrial Estate and Andover Airfield Business Park to the west and Walworth Business Park to the east. Andover Airfield Business Park is allocated under Policy LE9 for B1, B2 and B8 uses across

approximately 48 Ha (119 acres); whilst an extension off 11 ha (27 acres) to Walworth Business Park is proposed for B1(b), B1(c), B2 and B8 uses. These are both continuations of allocations from the previous 2006 Local Plan.

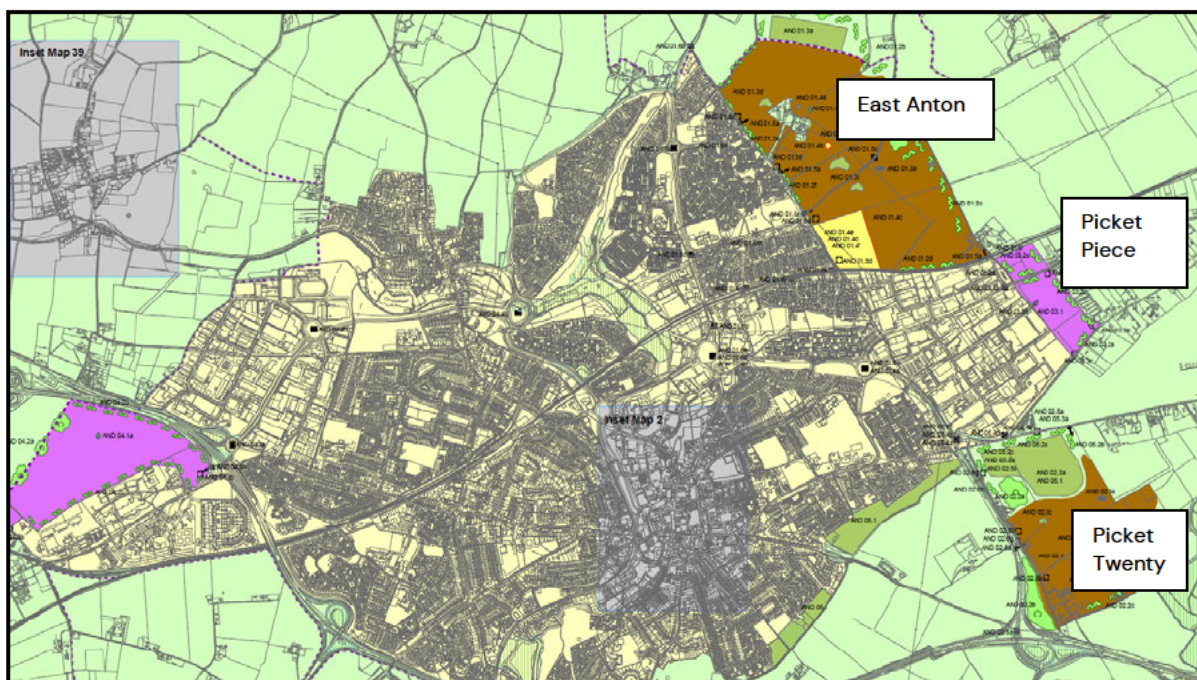
Figure 3.2 – Extract from Key Diagram – Adopted Local Plan 2011–2029



- 3.16. In terms of housing, growth is focussed to the east of Andover with two allocations at:
- **Picket Piece (Policy COM6)** – 400 dwellings and associated facilities
  - **Picket Twenty (Policy COM6A)** – 300 dwellings and associated facilities (extension to existing Picket Twenty Development)
- 3.17. There is a further mixed-use allocation within Andover Town Centre ‘George Yard/ Black Swan Yard’ (Policy LE14) which is proposed for retail, offices and up to 100 residential units. The remainder of the housing requirement in Northern Test Valley is to be delivered via committed developments, SHLAA sites and windfall developments.
- 3.18. As with the employment allocations, the pattern of housing growth to the east of Andover was largely established by the previous 2006 Local Plan, which ran until 2011, and allocated 3,700 across the following two sites (shown on the proposals map overleaf):

- **East of Icknield Way/ East Anton (AND.01)** – 2,500 dwellings together with a range of associated facilities.
- **Picket Twenty (AND.02)** – 1,200 dwellings together with a range of associated facilities.

Figure 3.3 – Proposals Map- 2006 Local Plan



3.19. Based on the last two adopted plans, there are three significant residential developments east of Andover and we assess these in more detail below, based on our own research and detail within the 'Councils Housing Implementation Strategy as at April 2021' (published December 2021), hereafter referred to as the '2021 HIS'.

Figure 3.4 – Overview of Andover Housing Sites (in relation to Bere Hill site)



### Picket Twenty – Persimmon Homes

- 3.20. This site has been brought forward by Persimmon Homes, who obtained Housing outline consent for 1,200 homes in 2008 (Ref: TVN.09275), which was brought forward through multiple phased RM applications. A further additional phase of 14 units (Ref: 16/O1461FULLN) was granted in December 2016. According to the 2021 HIS, site delivery was completed in the year 2018/19 totalling 1,202 homes, with the Picket Twenty Development Update (October 2018) confirmed that all homes had been sold.
- 3.21. An additional 17 units (Ref: 17/O3027/FULLN) were also granted in May 2018 and completed in the 2020/21 year according to the 2021 HIS, suggesting an overall capacity of 1,219 dwellings in Picket Twenty.
- 3.22. The development includes a local centre with an operational primary school, nursery and community centre. A large area of open space and playing fields, known as Harewood Common is located to the north, on an area of higher ground.

Fig 3.5 – Picket Twenty development



- 3.23. Persimmon Homes are also bringing forward the Picket Twenty extension, after gaining outline consent for 520 further dwellings in January 2018 (Ref: 16/03120/FULLN). The 2021 HIS confirmed that this began construction in 2018/2019 and had achieved 352 completions by April 2021, with the remaining 168 expected to be completed during the 2023/24 year.
- 3.24. An application for a further 78 dwellings on the north eastern section of the site (Ref: 18/02584/OUTN) remains undetermined.
- 3.25. There was a previous commitment to the north of Picket Twenty (between London Road and Ox Drove) on land at Harewood Farm for 180 dwellings (Ref: 14/00774/OUTN) which gained outline consent in 2015, however this expired because no Reserved Matters were submitted within the required 3 year timescale and is not referenced in the HIS. A revised December 2017 scheme is currently pending determination (Ref: 17/03153/OUTN), and appears to be subject to ecological/ HRA issues and negotiation with Natural England. Furthermore the application was submitted by Mr M Raymond and we understand there is no housebuilder connected at present.
- 3.26. Confusingly the 2021 HIS includes two entries for Harewood Farm in its identified supply, with the 2017 application above expected to deliver 50 units and the wider site 113 between 2021/22 and 2025/26, equating to a total of 163 dwellings. However, given this application is still undetermined and has no housebuilder attached we would question whether this is deliverable.



3.27. Overall, committed development on this allocated site is 1,739 dwellings, against a plan requirement of 1,500 dwellings, therefore a surplus of 279 dwellings. If the additional Picket Twenty Phase (78 dwellings) and Harewood Farm site to north of Picket Twenty comes forward as suggested, for between 163 and 180 homes, the surplus could be as much as 537 dwellings.

**Picket Piece –David Wilson Homes**

3.28. Wates Developments achieved outline consent for 530 units on this site in June 2011 (Ref: 10/00242/OUTN & APP/X3025/A/10/2140962) following an appeal. This has been built out in phases by David Wilson Homes through several Reserved Matters consents.

Fig 3.6 – Picket Piece Reserved Matters Phases

Application Reference	Application Description
13/00323/RESN (approved)	Development of 139 dwellings associated access streets, car parking, public open space, including local equipped area of play, allotments, landscaping and new wildlife habitat
13/00768/RESN (approved)	Development of 100 dwellings, associated access streets within the site, car parking, public open space including local equipped area and landscaping
14/01382/RESN (approved)	Development of 51 dwellings, associated access streets within the site, car parking and landscaping
14/01624/RESN (approved)	Development of 111 dwellings, associated access streets within the site, car parking, landscaping and access from Ox Drove for use by buses and emergency vehicles
15/01377/RESN (approved)	Development of 129 dwellings, local centre, football pitch, pavilion, children’s play area and tennis court with associated access streets, car parking and landscaping - Phase 3 East Area
<b>Total</b>	<b>530</b>

Source: Planning Statement supporting app ref 19/01485/FULLN

Fig 3.7 – Picket Piece development



- 3.29. The 2021 HIS confirmed that the original Picket Piece scheme has been delivered in full.
- 3.30. David Wilson Homes are also bringing forward the Picket Piece Extension. An additional 424 dwellings on site have been secured through a series of outline and full applications, as summarised below.

Fig 3.8 – Additional consents at Picket Piece

Address / Application Reference	No. of Units
Landfall Walworth Road Picket Piece - 14/00670/OUTN	24
Land adj Depot Ox Drove - 14/01174/FULLN	6
r/o 22 & 22a Walworth Rd - 14/01176/FULLN	9
School site - 14/01341/OUTN	63
r/o 8A Ox Drove - 15/00667/OUTN	25
Land at Picket Piece Ox Drove - 15/01377/RESN	129
'At Last' Ox Drove - 15/02013/FULLN	2
North of Walworth Rd - 15/03150/OUTN	53
Land North of Walworth Road - 16/00544/OUTN	30
Land Adj 10 Walworth Road - 82 dwellings - 16/01329/OUTN	82
Land Between 17 And 17A Walworth Road - 18/00602/FULL	1
<b>Total</b>	<b>424</b>

Source: Planning Statement supporting app ref 19/01485/FULLN

- 3.31. However the 2021 HIS suggests a capacity of just 384 within the plan period, with 236 completions at April 2021, and a further 148 expected by 2028/2029.
- 3.32. A further planning application for 16 additional dwellings on the site (Ref: 19/01485/FULLN) from 2019 is still awaiting determination and appears to be subject to negotiation with Natural England. There have also been various other small scale applications through 2019–2021 that are either live or have been refused, suggesting there is still demand for growth off this site, but that it might have reached its deliverable capacity.

- 3.33. Overall, committed development on this site is expected to deliver a total of 914 dwellings in the plan period against a plan requirement of 400 dwellings, a surplus of approximately 514 dwellings. If the live planning application is approved, this will be a surplus of 530 dwellings.

#### East Anton – Taylor Wimpey

- 3.34. Taylor Wimpey gained outline consent for 2,500 dwellings and associated employment, schools, local centres and other developments, back in 2008 (Ref: TVN.09258), with Reserved Matters totalling 2,484.

Fig 3.9 – East Anton development

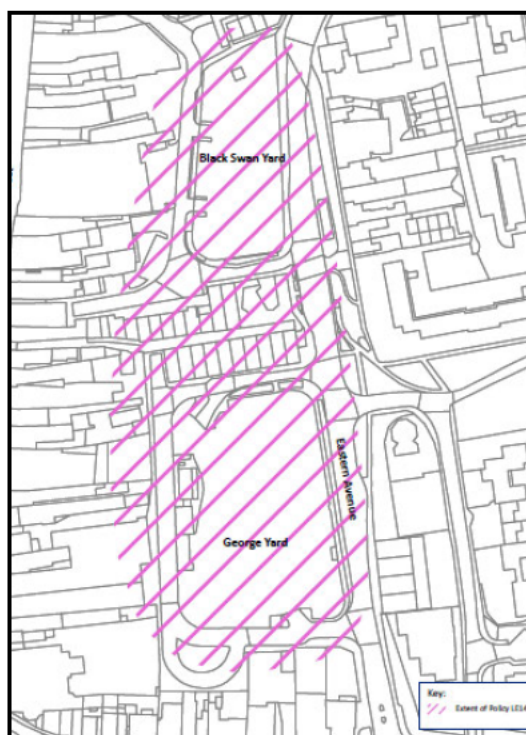


- 3.35. This has been built out in phases, and according to the 2021 HIS, 1,900 dwellings have been completed with 193 remaining as of 1<sup>st</sup> April 2021, suggested committed development of 2,093 dwellings. This equates to a delivery rate of 190 dpa over the last 10 years, which is projected to slow, with the remaining plots to be complete by the 2022/2023, and this position has been endorsed by the developer.
- 3.36. Outline consent for a further 350 units was granted in 2015 on surplus land which had previously been set aside for a secondary school (Ref: 12/O2497/OUTN). Reserved Matters approval (18/O3140/RESN) was granted in March 2019 for 314 dwellings. The 2021 HIS confirms construction is underway and indicates that there were 50 completions in the 2020/2021 year, with the remaining 264 expected within the next 4 years, with completion due by 2024/2025 (equating to an average rate of 63 dwellings per annum).
- 3.37. Another 20 units were also granted consent as part of the development of the Northern Local Centre within East Anton (Ref: 15/O0729/FULLN) and these were built out during 2017.
- 3.38. So, overall, committed development on this wider site is expected to deliver a total of 2,427 dwellings against a plan requirement of 2,500 dwellings, a shortfall of 73 dwellings.

## Other Developments

- 3.39. Sentinel Housing and Foreman Homes delivered an 85 residential unit scheme (Ref: 16/00872/RESN) at Land at Goch Way, Andover, which was completed in summer 2019.
- 3.40. There are 3 further smaller developments within Andover which are contained within the 5-year supply, 1 of which was already under construction in April 2021 (therefore assumed to now be complete) and the other two (totalling 104 dwellings) expected to commence towards the end of the 5 year period:
- Vespasian Road (Ref: 16/00474/FULLN) – 9 dwellings under construction and due to complete 2021/2022; and
  - Guilbert House, Greenwich Way (Ref: 19/01057/PDON) – 66 dwellings due to complete in full in 2025/2026; and
  - Crown Buildings, 6-8 London Street (Ref: 20/01791/PDON) – 38 dwellings due to complete in full in 2024/2025.
- 3.41. Allocation LE14 'George Yard/ Black Swan Yard' (for up to 100 dwellings) does not have permission yet and is not expected to begin delivering until 2027/28, with 60 dwellings due within the adopted plan period.

Figure 3.10 – Allocation LE14 – George Yard/ Black Swan Yard' – Town Centre Residential Site



## Andover Town Centre Masterplan

- 3.42. The current consultation (paragraphs 1.20–1.22) confirms that the Plan will assist delivery of the Andover Town Centre Masterplan, which was adopted in September 2020<sup>6</sup>, and there is an Andover and Romsey Town Centres Topic Paper which provides further detail on this matter.
- 3.43. Both the Masterplan and Topic Paper highlight the importance of new residential development within Town Centres, with multiple references to this (see key number 1, 3, 8, 11 and 12 below) however no specific sites are identified in the Masterplan. Even more pertinently, the only site specifically allocated for residential redevelopment in the adopted plan (LE14 ‘George Yard/ Black Swan Yard’ –for up to 100 dwellings noted above) is mostly retained as a car park (see key number 15 below which seeks enhancements to the car park on the George Yard section) with some minor residential proposed as part of a mixed use scheme with shops and public space on the Black Swan Yard section, which seems highly unlikely to yield anywhere near 100 dwellings, or even the 60 suggested in the 2021 HIS between 2027 and 2029. Indeed it is unclear from this whether the Town Centre as a whole will yield 100 new dwellings over the emerging period.

Figure 3.11 – Andover Town Centre Illustrative Masterplan



<sup>6</sup> As well as the South of Romsey Town Centre Masterplan.

- 3.44. Accordingly, the number of dwellings that could be delivered by the redevelopment of Andover Town Centre is unknown at this stage, and we reserve the right to comment on this matter at a later date. That said, based on the current evidence it is clearly not going to make a significant contribution to meeting Andover or Test Valley's emerging needs, and will not obviate the need for further greenfield development and settlement extensions, particularly to provide the range and mix of family housing required in the SHMA.

### **Housing Delivery Summary**

- 3.45. This section has demonstrated that Andover has seen substantial and consistent housing delivery in recent years, with commitments well above those planned for in the adopted plan, with this delivery expected to continue in the next 2 to 3 years. This is reflected in the relatively strong 5-year supply position put forward by the Council in the 2021 HIS, which indicates a 5.72 year supply in Northern Test Valley and 7.18 year supply for Southern Test Valley as of April 2021 (or 6.42 years overall).
- 3.46. These accelerated delivery rates and extensions to large allocations also suggest a buoyant housing market area with strong demand for new build homes, both for existing residents and people moving to the area.
- 3.47. That said, the trajectory in the Local Plan shows a significant reduction in delivery towards the later years of the plan period, with boroughwide deliver expected to drop from 637 in 2023/2024 to 330 in 2026/2027 onwards. This is particularly notable in Northern Test Valley, where the projected supply does not exceed the requirement in any year from 2021 onwards (with a cumulative shortfall of 1,280 over this period), however this has yet to show up within the 5 year supply position, due to the methodology the Council use to calculate supply which allows over delivery in the earlier years of the plan to off-set future shortfalls.
- 3.48. Either way, this could leave the Council in a vulnerable position on five-year supply in the coming years, both in Northern Test Valley and the Borough as a whole, unless additional housing land is identified.

### **Summary and Conclusions**

- 3.49. This section has demonstrated that Andover is the key settlement within Test Valley and has been the major focus for growth in successive Local Plans, and this has resulted in housing delivery in excess of Local Plan targets in recent years suggesting a robust and dynamic housing market within the town with the capacity for further growth.
- 3.50. It is clear from the plans presented that growth has focussed towards the east of the settlement in recent years, with the East Anton, Picket Piece and Picket Twenty allocations comprising approximately 5,153 dwellings of committed development, with over 4,764 of these having already been delivered (92.5%). We understand this distribution has been largely driven by a restriction on building above the 90m contour line within the Andover Bowl, which we address in more detail in the Development Framework at **Appendix 1**; as well as other local factors and constraints including the maintaining local gaps.
- 3.51. In spatial distribution terms, East Anton and Picket Piece are connected to the main urban area to the north west and west respectively, although they are some way from the shops and services of the Town Centre. However, Picket Twenty is slightly disconnected from the settlement, with the separation actually provided by the Peel land at Bere Hill, alongside the



adjacent L & Q's and Council land. Indeed the Bere Hill site and these surrounding parcels are far better connected to the Town Centre than these historic allocations.

- 3.52. In light of the Picket Twenty development to the east, and the containment provided by the A303 to the south, the Bere Hill land represents an obvious infill opportunity and the next logical location for growth in Andover.

## 4. Economic Growth in Test Valley

- 4.1. Chapter 5 of the consultation document discusses the housing and economic needs of Test Valley. Before we comment on this chapter, we set out below a contextual analysis of the economic growth trends seen in Test Valley to date.

### Employment Trends in Test Valley and Andover

- 4.2. Data published by the Office for National Statistics (ONS) allow for analysis of past trends in employment between 2015 and 2020 in Andover and Test Valley.
- 4.3. The six 2019 electoral wards that make up Andover are: Andover Downlands; Andover Millway; Andover St Mary's; Andover Harroway; Andover Romans; and Andover Winton. This is consistent with the definition used in *Andover Town Profile 2021*, produced by Test Valley Borough Council.
- 4.4. Between 2015 and 2020, employment in Test Valley remained flat at 60,000. Andover saw employment decline by 0.6% per annum over this period, although all of the decline occurred between 2019 and 2020. This is likely to be a reflection of the Covid-19 pandemic and the impact it had on the labour market. Between 2015 and 2019 for example, employment in Andover increased by 1.2% per annum, higher than the growth in Test Valley of 0.8% per annum and Great Britain (also 0.8% per annum).

### Employment Growth Assumptions

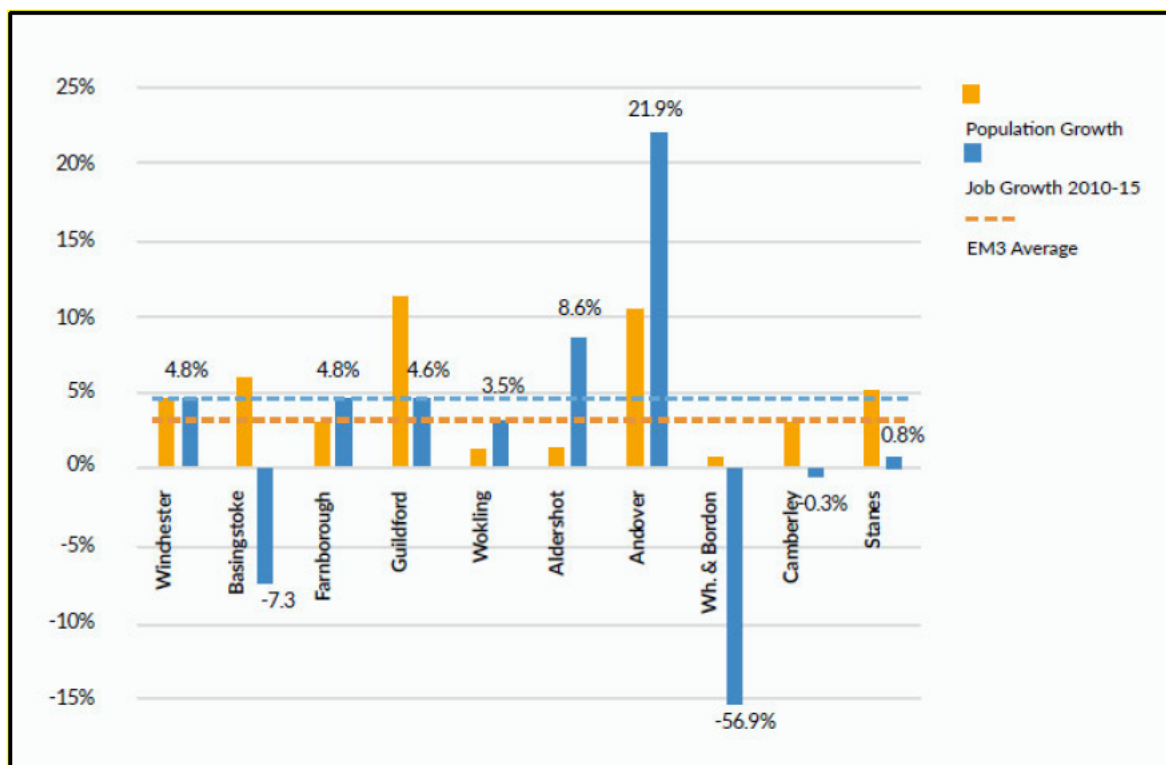
- 4.5. The Reg 18 Draft Local Plan refers to a local housing need of 541 homes per annum, which is based on the government's standard method. This is in turn based on the updated SHMA, which also concludes that there are no exceptional circumstances to justify using an alternative approach.
- 4.6. It is important to note that the standard method is identified in Planning Policy Guidance as providing the minimum number of homes to be built and does not take into account economic growth aspirations (see section 8 for more detail).
- 4.7. As already noted, between 2015 and 2020 employment in Test Valley remained at the same level. However, if the data is analysed for the period 2015-19 (i.e. before than Covid-19 pandemic began), job numbers grew by 0.8% per annum, in line with Great Britain. Andover saw even faster annual growth of 1.2%.
- 4.8. Andover also saw strong jobs growth prior to 2015, as highlighted in the Strategic Economic Plan of the Enterprise M3 Local Enterprise Partnership, which the area is part of. The SEP notes that Andover saw jobs growth of more than 20% between 2010 and 2015 – this is total growth, rather than the annual growth discussed above. The SEP also highlights the role that towns can play in a stronger economy and presents employment growth from 2010-15 for a number of towns that are in the LEP area. Andover's growth is significantly higher than any of the other towns, as shown in Figure 4.1<sup>7</sup>.

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<sup>7</sup> The geographical definition of Andover may differ slightly in the Strategic Economic Plan.



Figure 4.1 – Employment Growth in Towns within the Enterprise M3 LEP area, 2010–15



Source: Enterprise M3 Strategic Economic Plan, 2018–2030

4.9. In considering whether to go with the standard method for housing need, it is worth considering whether there are any strategic growth strategies that may lead to faster growth in Test Valley and the wider LEP area (see section 8 for more detail). This in turn could lead to increased housing demand. One such document is the M3 LEP’s Revive and Renew report<sup>8</sup>, published in 2020, which provides an economic recovery and renewal action plan in response to the covid-19 pandemic. The report identifies a number of strategic priorities for the LEP area, including:

- Job creation and skills for employment
- Digitisation and ultra-fast digital infrastructure for business resilience, innovation and growth
- Growth in the low carbon economy
- Supporting business led-innovation, entrepreneurship, high-tech, scale-up businesses and international trade.

4.10. It is not unreasonable to expect that if the priorities above are realised, labour market growth in the M3 LEP area is likely to be significant over next 10–20 years. If more jobs are created, it is logical to expect an increase in the number of people wanting to live in LEP area, including Test Valley and Andover. This will lead to increase demand for housing. At the very least,

<sup>8</sup> Revive and Renew: An Evidence and Intelligence-Based Economic Recovery and Renewal Action Plan for the Enterprise M3 Area.



consideration needs to be given as to what housing provision could be needed as a result of this. Simply going with the standard method will not reflect the potential impact of the covid-19 recovery plan. Prior to the pandemic, the Andover and Test Valley labour markets were performing well and given the UK economy is recovering better than expected from its impact, work needs to be undertaken to model economic growth scenarios for Test Valley to test the implications on housing need. The updated SHMA does not do this.

- 4.11. Over the last five years the Council has delivered just over 4,300 homes and over 1,300 affordable homes. Housing delivery meets the housing needs of the community and supports delivery of associated infrastructure. In 2019, Test Valley was ranked 31 out of 326 local authorities in England for housing delivery. There is therefore a compelling case to continue these high levels of housing growth in the future, to align with economic growth.

## 5. Introduction, Vision, Key Challenges and Objectives (Chapters 1 & 2)

### Plan Period

- 5.1. Paragraph 1.37 notes how the Plan Period will now start in 2020 and have a proposed end date of 2040 (extended from 2036 in the previous consultation). This equates to a 20 year plan with 15-year forward period from the expected adoption date in 2025, which aligns with paragraph 22 of the NPPF, a position we wholly support as it will allow the plan to anticipate and respond to long-term requirements and opportunities.
- 5.2. This also aligns with the wider timescales for the Partnership for South Hampshire (PFSH)<sup>9</sup> as noted in paragraph 2.18, which is a voluntary partnership of a 12 authorities that deals with a range of strategic planning matters across the sub-region, as they are preparing an updated Statement of Common Ground which looks forward to 2040 with a possible long-term vision to 2050.

### Evidence Base

- 5.3. Peel fully support the Council's intention to align the evidence base with the 2020 plan start date (as set out in paragraph 1.39), as this will provide a consistent basis for the analysis of development needs and wider technical matters.
- 5.4. We note that several key evidence documents have been published alongside this consultation (notably Sustainability Appraisal, Habitats Regulations Assessment, Equalities and Health Impact Assessments) and that others are still being updated, which is understandable at this stage of the plan.
- 5.5. That said, we would flag up the following areas of the evidence base that have not been updated for some time, and will be important inform the next Stage of the Plan, particularly if this is going to identify sites as expected.
- Strategic Flood Risk Assessment – has not been updated since 2007
  - Infrastructure Delivery Plan – has not been updated since 2014.
  - Brownfield Register – whilst latest version is 2020, the PPG suggests these should be updated on an annual basis.
- 5.6. Peel reserves the right to comment further on these documents once they are updated.

### Regional Context and the Duty to Cooperate

- 5.7. Paragraphs 2.16 – 2.20 highlight the need for Council's to co-operate with neighbouring authorities on strategic matters that cross over boundaries, including meeting housing needs,

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<sup>9</sup> PFSH – comprises Test Valley together with East Hampshire, Eastleigh, Fareham, Gosport, Hampshire County, Havant, New Forest, Portsmouth, Southampton, and Winchester Councils and New Forest National Park.

with Figure 2.1 illustrating that Test Valley shares boundaries with 8 neighbouring local authorities, including several within the PfSH area mentioned above.

- 5.8. However, it is unclear from the current consultation if this duty has been properly considered in respect of unmet housing need. In chapter 5 of the plan the Council state that there is no evidence of unmet housing, and this issue is not addressed/ tested in the Spatial Strategy Topic paper or Sustainability Appraisal. However a recent meeting of the PfSH Joint Committee in October 2021, in relation to their Statement of Common Ground, suggested that unmet housing need in the PfSH area could be as high as 13,000 dwellings based on current supply assessments.<sup>10</sup> We address this issue in more detail in section 6 of this report.

## Vision

- 5.9. At paragraph 2.21, the consultation document outlines the current Vision for the emerging Local Plan (**bold text added by Pegasus for emphasis**):

*“By 2040, Test Valley Borough’s communities will be prosperous and resilient by:*

***Providing access to good quality homes that will meet a range of needs and aspirations, including affordable housing.*** *Countering our changing climate through mitigation and adaptation and delivering well designed developments to a high standard that encourage inclusivity, health and security. High quality of life will be experienced by our communities, and they will enjoy a strong sense of identity. Development will take place in sustainable locations and support the delivery of infrastructure.*

*The Borough’s economy will be thriving and supported by a skilled workforce. The economy will experience sustainable growth across a range of sectors, including the high technology and green industries and the visitor economy. Residents will have access to training, education and work opportunities and enjoy well-connected working environments. The Borough will continue to be known for its varied, green and distinctive landscapes, heritage and rich ecology.*

*Our natural, built and cultural resources will be safeguarded for future generations to enjoy. The character of our individual settlements will be maintained and their sense of place enhanced. **The market towns of Andover and Romsey will have thriving town centres, offering high quality connected green and public spaces and a mix of leisure, shopping and cultural facilities and homes, with sustainable transport connections.** The smaller local centres will provide for the needs and aspirations of residents and visitors. The vibrancy of our rural communities will have been retained through sustaining access to facilities and services they need to support healthy, active lifestyles and wellbeing and enjoy access to our diverse and outstanding countryside.”*

- 5.10. Peel are generally supportive of this Vision, as it is broadly in line with the NPPF paragraph 16b, which outlines how Plans should be prepared positively in a way that is aspirational but deliverable. However, whilst the Vision is aspirational, we are concerned that the remainder of the Local Plan as drafted will not deliver the outcomes it is looking to achieve, notably:

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<sup>10</sup> <https://www.push.gov.uk/wp-content/uploads/2021/10/Item-11-Statement-of-Common-Ground-Revisions-and-Update.pdf>

- The currently proposed strategy to pursue the Local Housing Need figure of 541 dwellings per annum, which is the absolute minimum requirement, is not aligned with the economic growth aspirations of the Borough. Indeed, the LHN figure does not take account of economic growth, therefore the housing and economic growth strategies in Test Valley are in danger of misalignment.
- The specific reference to Andover within the Vision is welcomed and supported, given it is the highest performing settlement in the Borough as demonstrated throughout these representations. However, the Town Centre development of Andover should not be considered a panacea that will meet all or even the majority of Andover's needs. Indeed, there will be a need to identify and allocate other development sites outside of Andover Town Centre in order to ensure emerging development requirements are met.

5.11. Therefore, whilst Peel support the ambition of the Vision, we are concerned that the Local Plan as drafted will not deliver on these aspirations.

### Objectives and Challenges

5.12. The plan goes on to set out 10 draft objectives by theme (in paragraphs 2.24–2.64), and we comment on the following:

- **Our Communities** – We wholly support this objective and the need to support the viability of the Borough's town and village centres, but would highlight the role that new housing plays in this, by generating new footfall and expenditure to support local businesses, and suggest that this is noted in the wording.
- **Town Centres** – We welcome and support the aspiration to create vibrant Town Centres in Andover and Romsey, to include regeneration schemes and mixed use developments with a residential element, and acknowledge the work that has already progressed on the Andover Town Centre Masterplan. However, we would highlight that the need and capacity for new residential development within the Town Centre should not come at the expense of retail, cultural or leisure uses, as these are still the principal drivers of footfall and economic growth within Town Centres, and particularly in Andover given it is the main Town Centre in the Borough.
- **Built, Historic and Natural Environment** – In relation to the natural environment, the supporting text to this objective notes the need to achieve nutrient neutrality in new developments through mitigation, as advised by Natural England to combat high levels of nitrogen and phosphorous entering the Solent. We fully endorse this and acknowledge that this is a critical issue across the Borough. In light of this it is our view that nutrient neutrality should form its own objective or be central in the wording of at least one of the objectives (either Climate Change, Built, Historic and Natural Environment and/or Ecology and Biodiversity). This should also acknowledge the Local Plans role in seeking to address this issue at a strategic scale, rather than relying on ad hoc mitigation through individual development schemes.
- **Housing** – We fully support this objective in principle, but do raise concerns later in this report over the proposed housing need figure and other detailed policy approaches around meeting the needs of different groups.

- **Economy, Employment and Skills** – As with the communities objective above, we would ask that this text recognises the contribution that new housing makes to the local economy, and the need for housing needs and economic growth aspirations to be aligned (and based on robust, up to date evidence).
- **Transport and Movement** – We fully support this objective, but would stress that satisfying this will be contingent on the Council having a robust and up to date Infrastructure Delivery Plan (i.e. and update on the 2014 version currently available).

5.13. Finally we would stress that the proposed development at Bere Hill will make a contribution to, or have negligible impacts on, all 10 of these objectives as demonstrated within section 2 of this report and the associated Appendices 1 – 3 and that must be viewed as a positive of the proposal.

## 6. Spatial Strategy (Chapter 3) & Andover Settlement Analysis

6.1. Chapter 3 of the consultation document sets out the proposed spatial strategy and settlement hierarchy for the emerging Local Plan, and is supported by the following evidence base documents:

- Spatial Strategy Topic Paper (February 2022); and
- Settlement Hierarchy Assessment (February 2022).

### Spatial Strategy

6.2. The supporting text (paragraph 3.5) confirms that the plan will not include a specific policy that sets out the presumption in favour of sustainable development, but will instead define what sustainable development looks like in Test Valley through the Spatial Strategy.

6.3. We support this localised approach to avoid unnecessary duplication of generic national policy, however in order to be justified and effective, the spatial strategy must set clear housing requirements for the different tiers of the settlement hierarchy and identify allocations to support and sustain housing delivery through the entire Local Plan period, and beyond. At present the actual policy wording is more general and vague and more in keeping with a Vision/ Mission Statement.

6.4. Paragraphs 3.8 – 3.15 go on to explain how the preferred spatial strategy is a hybrid of three set out at Issues and Options stage, namely:

- **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).

6.5. We are broadly supportive of this hybrid approach, as per our previous representations, as it seeks to ensure that the most sustainable settlements (i.e. Andover and Romsey) continue to receive the most growth, whilst also supporting other settlements and rural communities with capacity to grow in full accordance with the NPPF. However, we do raise some issues and caveats that must be considered.

6.6. Firstly, we would reiterate that Andover is the dominant settlement in the Borough, and is over twice the size of Romsey and growing at a faster rate and should therefore continue to receive the highest level of growth.

6.7. Secondly, the distribution of growth will need to include a detailed understanding of the deliverability and capacity of each settlement and potential allocation. Indeed it is pertinent that the majority of the strategic allocations in Andover (Picket Twenty, Picket Piece and East Anton – see section 3) have over delivered against their original housing trajectories and/or requirements in the current plan period demonstrating the strength of the housing market in Andover for large volume housing sites.

- 6.8. However the strategic allocation at Whitenap in Romsey from the 2016 plan has encountered significant delays in coming forward, as referred to in paragraph 3.11 of the plan, with delivery now not expected to begin until 2025/2026 according to the 2021 HIS, over 9 years after adoption. The emerging plan should seek to avoid similar issues and delays by undertaking a robust review of site deliverability to reduce the risk of shortfalls in housing delivery.
- 6.9. To that end, we welcome the acknowledgment in paragraph 3.10 that Andover will require further greenfield sites to be released and cannot rely solely on Town Centre development to deliver the scale or mix of housing that is likely to be required (as per our comments in section 3).
- 6.10. Finally, this assessment of deliverability must prioritise locational sustainability, particularly in respect of Andover, where it is clear that historic allocations to the east of the settlement have largely been supported to avoid building on higher ground (90+ m) but have arguably led to more fragmented landscape character and urban sprawl, creating car-based developments beyond walking distance of the Town Centre (see Figure 2.1).

### **Settlement Hierarchy**

- 6.11. Whilst we have largely covered the settlement hierarchy, and Andover's place within it (both in the adopted and emerging plans) in section 3 we provide more general comments here on Spatial Strategy Policy 1 (SSP1): Settlement Hierarchy and the supporting paper.
- 6.12. Firstly, we wholly endorse Andover being retained in the top tier of the settlement hierarchy, although would reiterate its predominance over Romsey, both in terms of size and function, and therefore question whether it should form its own tier (or at the very least be recognised as the primary settlement that should receive a higher proportion of growth).
- 6.13. Secondly, the assessment paper only considers the current position with facilities and public transport accessibility within the settlements; whereas there are a number of other relevant factors which will help consider a settlements capacity for future service growth considerations including housing market conditions, past delivery rates and land constraints and availability.
- 6.14. This narrow consideration of services has arguably downplayed Andover's importance in the emerging plan and is likely to have done for other settlements as well.



## 7. Strategic Policy Framework (Chapter 4)

- 7.1. Chapter 4 of the consultation document discusses a series of other topics, including key environmental matters for Local Plan policy to consider such as climate change, biodiversity and design.

### Climate Change

- 7.2. Due to the consultation being Regulation 18 in nature, at this stage, there are no detailed policies regarding how climate change matters will be addressed in the Local Plan. However, 'Strategic Policy 1: Countering Climate Change' does outline broad principles by which the Council intends to tackle climate change matters. The policy notes how development will only be permitted provided it meets certain criteria, which we have paraphrased below:
- Minimisation of Greenhouse gas emissions, including reduced energy demand and utilisation of renewable and low carbon technologies;
  - Maximising the potential for active and sustainable travel;
  - Development designed to be adaptable to changing needs and technologies;
  - Development designed to provide appropriate resilience and make efficient use of water;
  - Delivering net gains for biodiversity; and
  - Opportunities to use or reuse land efficiently.
- 7.3. At the outset we would reiterate the point raised by the HBF that whilst development can 'support' the delivery of a zero-carbon future through the phased improvements to technical standards and reducing the need to travel, it will take individuals changing their behaviour in order for the country to meet its net zero target.
- 7.4. The supporting text to the policy confirms that the next Local Plan consultation will provide further detail on these policies, with paragraph 4.3.1 noting changes to the 2022 Building Regulation requirements. At this point, we would highlight that any emerging climate change/environmental policies should be consistent with the latest Building Regulation requirements, which includes the proposed introduction of mandatory electric car charging points. This will ensure consistency across the board and to ensure that local planning policy is in line with central Government's environmental aims and policies.
- 7.5. We welcome the text at paragraph 4.34, which states that it is recognised that some policy proposals may increase costs for delivering development and that a viability assessment of the Local Plan 2040 will be undertaken to ensure policies are deliverable. It is critical that if optional technical standards (such as water efficiency) are proposed to be introduced, or indeed any other environmental policies which may increase construction costs, they must be fully assessed as part of the Viability Assessment and fully justified.

## Environment

- 7.6. Paragraph 4.38 onwards refers to the recent Environment Act 2021, which includes a series of targets and policies including the introduction of mandatory Biodiversity Net Gain (BNG) for certain planning applications (minimum 10% net gain on new schemes).
- 7.7. Given the current transitional arrangements for BNG, there is a need for further guidance to be published which the Government are currently preparing. We welcome the recognition at paragraph 4.39 that it will be essential that BNG is considered from a very early stage of development, including consideration of opportunities to meet the requirement where this is appropriate to do so. Indeed, this is a matter that needs to be considered as part of the site allocation process, and Peel are keen to actively engage with the Council on this matter in relation to their land interests at Bere Hill, Andover. It is important to ensure that proposed allocations can adequately meet BNG requirements, including viability considerations, therefore early engagement is important.
- 7.8. In respect of the environmental topics listed in paragraph 4.41 we note the following:
- **Local Green Spaces** – If such designations are to be made then the criteria and decision process for identifying them needs to be made clear. Furthermore, as with local gaps, these should only be considered once it has been demonstrated that development needs can be met in full.
  - **Protected Sites Habitats and Species** – Includes the example of excess nitrogen reaching the Solent, and as with our comment in section 5, we consider that this issue should have its own objective or policy, to allow the Local Plan to address it at the strategic scale, rather than relying on ad hoc mitigation through individual developments.

## Delivery of sustainable and high-quality development

- 7.9. Strategic Policy 2 (Delivering healthy, well-designed development) outlines a series of high-level principles relating to good design, including the need to design out crime, prioritise sustainable travel etc. Paragraph 4.58 then notes how detailed policies will be contained within the next consultation, likely to include (amongst others):

### *The requirement and standard of private amenity for new development*

- 7.10. More detailed guidance on the role and scope of design codes, masterplans and design and access statements.
- 7.11. With regards to amenity standards, there has been a move in recent years from top-heavy, prescriptive standards for separation distances to a more nuanced approach on a site by site basis. This is appropriate as it allows for the best design solution on a case by case basis. Accordingly, we would suggest a flexible policy approach in respect of amenity standards.
- 7.12. In terms of design codes and masterplans, these matters should be considered very early on in the Local Plan process if they are required. This is to ensure that there are no delays to the delivery of allocated sites post adoption of the Local Plan, as often site allocation policies which require a Design Code or Masterplan to be submitted can elongate delivery timescales.



### **Andover and Romsey Town Centres**

- 7.13. Strategic Policy 3 outlines how development will promote an efficient and mixed use of land and buildings within Andover and Romsey town centres. There will be a need to take account of the town centre Masterplan and it is noted that residential uses will be encouraged in certain areas of Andover town centre.
  
- 7.14. Peel supports the regeneration of Andover town centre, albeit reiterate our earlier comments that this is unlikely to yield significant dwelling numbers, and therefore the emerging plan will need to allocate additional greenfield site allocations outside of Andover town centre to ensure emerging development needs are met, both in terms of scale and mix.

## 8. Meeting our Needs (Chapter 5)

### Meeting our Housing Needs

- 8.1. This section of the consultation document seeks comments on Strategic Policy 6: Housing Provision. The policy sets out that the housing requirement for the Borough is a minimum of 10,820 homes, to be delivered over the plan period of 2020 to 2040, equating to 541 dpa.
- 8.2. This is split between the Northern Test Valley (6,167 homes or 308 dpa / 57%) and Southern Test Valley (4,653 homes or 233 dpa / 43%) Housing Market Areas. It notes that the Regulation 18 Stage 2 will include a series of more detailed policies and set out draft site allocations.

### *Housing Need*

- 8.3. The NPPF expects strategic policy-making authorities to follow the standard method for assessing local housing need, as set out in the PPG. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply (NPPG, 2a-002-20190220).
- 8.4. The SHMA identifies the local housing need figure of **541 dpa** following the standard method (based on 2014 household projections and 2020 affordability ratio across the period 2021-2031). Helpfully, the consultation document notes that the local housing need figure could change because of the variables used in calculating the standard method during the preparation of the Local Plan (paragraph 5.13).
- 8.5. Indeed, since the consultation document was published the updated 2021 affordability ratios have been released, and when these are applied to the 2022-2032 period the latest local housing need figure to **553 dpa** in Test Valley (an increase of 2%).
- 8.6. However, whilst this increase is fairly modest, underlying affordability has actually worsened from 9.76 to 10.6 (so 8.6%), which is much more significant, however the effects of this off-set are therefore hidden by lower baseline growth over the new 2022-2032 period.
- 8.7. The standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure (NPPG, 2a-002-20190220). Helpfully, the Council recognise that the local housing need figure provides the starting point and minimum amount for establishing the housing requirement (paragraph 5.8).
- 8.8. It is also necessary to consider circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates such as situations where increases in housing need are likely to exceed past trends (NPPG, 2a-010-20201216). Again, the plan helpfully notes that the Council will need to monitor whether future evidence indicates that an alternative housing requirement is needed (paragraph 5.13). Indeed, Peel consider that the existing evidence indicates that an alternative housing requirement is needed.

### *Growth Strategies and Strategic Infrastructure Improvements*

- 8.9. When deriving the housing requirement, there is a need to consider growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and

facilitate additional growth (e.g. Housing Deals) and strategic infrastructure improvements that are likely to drive an increase in the homes needed locally (NPPG, 2a-010-20201216).

- 8.10. The SHMA states that there is no growth strategy in place for Test Valley and that the Council have not identified any strategic infrastructure which might drive higher levels of growth (SHMA, paragraph 3.18). The Sustainability Appraisal says that since there is no such growth strategy in place and no strategic infrastructure requirements have been identified that would necessitate higher levels of housing to be delivered there is no justification for this to be considered as a reasonable alternative (Sustainability Appraisal, paragraph 10.8). This leads the Council to say in the consultation document that there are no exceptional circumstances in Test Valley or any reasonable alternatives to assess (paragraph 5.12).
- 8.11. However, Test Valley is within the 'Enterprise M3' Local Enterprise Partnership (LEP) which formed in 2011 and covers the M3 corridor across West Surrey and much of Hampshire. Since 2014 the LEP has secured over £240m in government funding from various 'Growth Deals' to deliver its Strategic Economic Plan (SEP), published in 2014 and updated 2018. The latest 2018 SEP specifically highlights the need to accelerate the supply of new homes to help deliver economic aspirations (SEP, page 14).
- 8.12. Much of the early investment secured by the LEP was focussed around major transport projects in the wider LEP area (outside Test Valley), but since then it has been more focussed on innovation and skills throughout the area. As part of this, Andover has been identified as a 'Step up Town', defined as an area of latent economic potential requiring intervention to remove barriers to growth, and allocated a Growth Package including a series of catalytic transport and infrastructure measures to alleviate congestion and enhance capacity and town centre renewal to promote inward investment, skills centres of excellence and interventions to unlock housing sites. Progress to date includes the development of the Andover Skills and Technology Centre and elevated housing delivery in recent years.
- 8.13. It is also pertinent that the Partnership for South Hampshire (PfSH) authorities form part of the Solent LEP area, which has itself received 'Growth Deal' funding of £183m since 2014 and has invested in a number of strategic infrastructure projects.
- 8.14. This clearly demonstrates the ambitious growth strategies and strategic infrastructure improvements in this location that could support an elevated level of housing growth to that set out in the standard method.

#### Unmet Housing Need

- 8.15. When deriving the housing requirement, there is a need to consider taking on unmet need from neighbouring authorities (NPPG, 2a-010-20201216).
- 8.16. The SHMA states that to date no formal requests have been made to meet any potential identified unmet need, but if there are any requests to meet unmet needs in the future these will be considered in due course (paragraph 3.18). The Sustainability Appraisal (paragraph 10.8) says that no formal requests have been received at present regarding any unmet housing need in neighbouring local authority areas that would need to be addressed in Test Valley, and there is no justification for this to be considered as a reasonable alternative but will need to be kept under review as preparation on the plan progresses. The Council state in the consultation document that at present there is no evidence of any unmet housing need in neighbouring local authority areas but does helpfully note that this will need to be kept under review (paragraph 5.12).

- 8.17. Peel welcomes the fact that the Council will be keeping this under review since it will be essential for the Council to fulfil its obligations with regards to the duty to co-operate, particularly when the outcome of further work currently being undertaken on behalf of the PfSH may necessitate the need for Test Valley to consider an uplift in their housing requirement.
- 8.18. The Statement of Common Ground October 2021 by the PfSH identifies supply between 2021 and 2036 would fall short of meeting identified needs in South Hampshire sub-region by 12,896 homes. This shortfall is split across the Portsmouth and Southampton Housing Market Areas (within includes Southern Test Valley), with over 7,000 home shortfall coming from Southampton and over 5,000 homes from New Forest District Council.
- 8.19. So whilst New Forest recently adopted a new local plan and Southampton are currently preparing on that may remove or reduce this unmet need, there remains a significant likelihood that there will be unmet housing needs in neighbouring areas that will need to be addressed in adjacent boroughs such as Test Valley.
- 8.20. Indeed PfSH recognise that further Strategic Development Opportunity Areas are required alongside smaller brownfield and greenfield developments, and these would be ideally places to meet wider unmet needs.
- 8.21. Should it be necessary to consider any uplift in the housing requirement in Test Valley to help meet unmet needs this will need to be agreed through the Duty to Cooperate process and tested as a reasonable alternative in the Sustainability Appraisal.

#### Affordable Housing

- 8.22. When deriving the housing requirement, there is a need to consider an uplift where it would help deliver the required number of affordable homes (NPPG, 2a-024-20190220).
- 8.23. The SHMA identifies that there is an acute affordable housing need within the Borough for 652 dpa (SHMA, paragraph 32). This is more than the local housing need figure of 541 dpa (or 553 dpa). Despite this acute need, the Sustainability Appraisal states (at paragraph 10.8):
- “The standard method for local housing need includes an uplift to aid in addressing this matter. The SHMA advises that caution needs to be taken when trying to make a direct link between affordable need and planned housing delivery figures. 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. Therefore there is no justification for this to be considered as a reasonable alternative, as recommended by the SHMA”.*
- 8.24. Peel accept that addressing affordable housing need is not as simple as increasing the housing requirement, but this is not justification for failing to consider a higher housing requirement as a reasonable alternative in the Sustainability Appraisal, particularly when it is reasonable to assume that the market would be able to sustain a higher rate of housing delivery than 541dpa (or 553 dpa), as it has done so for each of the last 8 years (see figure 8.1 below). As such, a higher housing requirement could be an effective way of boosting affordable housing delivery to meet the identified acute need and should be considered as a reasonable alternative in the Sustainability Appraisal.

8.25. This is not to say that it would be reasonable to expect the Council to meet its 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.

Past Housing Delivery

8.26. It is useful to consider past housing delivery to give a sense of what would be an appropriate housing requirement moving forward. Figure 8.1 below sets out housing completions in Test Valley between 2014/15 and 2021/22 and shows there were 6,204 net completions over that 8 year period at an average of 843 dpa. This significantly exceeds the standard method figure of 541 dpa (and 553 dpa) and shows that Test Valley has clearly been able to sustain higher growth than the standard method figure. Indeed, Northern Test Valley alone has been delivering in excess of the standard method figure at an average of 589 dpa over those 8 years.

Figure 8.1: Past Housing Delivery in Test Valley Against Standard Method

	Completions			Standard Method Figure	Over-Delivery
	North	South	Total		
2013/14	359	183	542	541	1
2014/15	668	212	880	541	324
2015/16	666	338	1,004	541	448
2016/17	651	240	891	541	335
2017/18	599	194	793	541	237
2018/19	560	249	809	541	253
2019/20	669	279	948	541	407
2021/22	542	337	879	541	338
<b>Total</b>	<b>4,714</b>	<b>2,032</b>	<b>6,746</b>	<b>4,328</b>	<b>2,343</b>
<b>Average</b>	<b>589</b>	<b>254</b>	<b>843</b>	<b>541</b>	<b>293</b>

Source: Authority's Monitoring Report December 2021

8.27. The Authority's Monitoring Report December 2021 also highlights that other than in 2013/14 housing delivery has also consistently exceeded the housing requirement set out in the Adopted Local Plan (588 dpa) which is also significantly in excess of the standard method figure.

**Housing Requirement over Plan Period**

8.28. The plan sets out the overall housing requirement for the plan period 2020 to 2040 at 541 dpa (Table 5.1). As mentioned, this is the minimum local housing need figure, which is now out-of-date following the updated affordability ratios, and it is also appropriate to consider a higher housing requirement at Regulation 18 Stage 2 for the reasons set out above.

## Housing Market Areas

- 8.29. The plan confirms that the Housing Market Areas Study recommends a continued split of the Borough into Northern Test Valley and Southern Test Valley, but with a revised boundary which takes account of the wider extent of the Housing Market Areas on a regional and sub-regional basis (paragraph 5.17). Peel takes no issue with splitting the Borough into its constituent Housing Market Areas. That said, the distribution of the housing requirement is a separate exercise which should seek to provide the right number of homes in the right locations.
- 8.30. The Housing Market Areas Study notes that that it will ultimately be for the Council to decide on the distribution of growth within the Borough boundaries and that this should take into account wider considerations such as sustainability, capacity and environmental constraints (Housing Market Areas Study, paragraph 7.10). Peel considers this to be a sensible approach to the distribution of growth.
- 8.31. However, it goes on to clarify that the Council have simply split the housing requirement between Northern Test Valley and Southern Test Valley based on the population within each in order to be consistent with the local housing need assessment which is derived from a demographic basis (paragraph 8.15). This is an over-simplistic approach to the distribution of housing growth and results in the Council proposing to direct just 57% of housing growth to Northern Test Valley (paragraph 5.19). This can be compared to the Adopted Local Plan which directs 67% of housing growth to Northern Test Valley which was based at that time on a more refined approach which responded to job forecasts and to allowed Andover to support new retail and leisure facilities.
- 8.32. Peel seriously questions the appropriateness of simply apportioning the housing requirement on a demographic basis without consideration having first been given to the different sustainability, capacity and environmental constraints in Northern Test Valley and Southern Test Valley. Peel considers that it would be more appropriate to distribute growth by taking account of these matters, the availability and suitability of appropriate sites, and areas where there is evidence of strong housing delivery. Ultimately, the strategic allocations should be informed by this wider assessment of the distribution of growth and should not be chosen to fit the pre-determined distribution of growth set out in the consultation document.
- 8.33. The plan document identifies that Northern Test Valley and Southern Test Valley could be further split into four sub areas reflecting the urban and rural character of these areas and that the distribution of these homes in the sub areas will be considered at Regulation 18 Stage 2 (paragraph 5.20).
- 8.34. Notwithstanding the comments above, Peel considers it appropriate to direct most growth to the urban areas, such as Andover and Romsey – albeit with acknowledgment that Andover is the dominant settlement in Test Valley, as this would clearly be suitable for a higher proportion of homes than the rural areas from a sustainability, capacity and environmental perspective and when considering the availability and suitability of appropriate sites. Indeed, the Adopted Local Plan apportions 90% of the growth in Northern Test Valley to Andover itself. To reiterate, Andover is not only a highly sustainable settlement as acknowledged by the Council, but also has a very strong housing market that has the ability to deliver houses quickly. Planned development in Andover, through additional strategic allocations like Bere Hill, would be entirely sustainable and help to deliver an effective, positively prepared and justified plan.



## **Housing Supply**

- 8.35. The consultation document sets out the current housing supply against the current housing requirement to identify a residual requirement. Whilst this is informative, the Council helpfully note in the consultation document that the supply figures may change over time and will need further investigation to ensure that enough homes are planned for (paragraph 5.23). Peel would also like to point out that there are compelling reasons for a higher housing requirement, and whilst this would result in a higher residential requirement there is no evidence to suggest that this cannot be accommodated in Test Valley.
- 8.36. The Council recognise in the consultation document that they will need to consider whether to allocate land to deliver more homes than the minimum they are required to delivery in order to provide greater resilience in their housing supply (paragraph 5.25). Peel considers that it is essential for the Council to allocate beyond needs if the Local Plan is to be considered sound to take account of the fact that changing circumstances in relations to any site can lead to delays to a site coming forward or delivery being slower than expected. Allowance should also be made 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.
- 8.37. To ensure that the plan is deliverable across the plan period it is therefore necessary for there to be a buffer between the housing requirement and supply to take account of any delays or shortfalls in delivery expectations. In terms of quantum, there is no formal guidance on this, but we would generally advocate a buffer of between 10 and 20% in line with the position commonly taken by the HBF and at Local Plan EiPs.
- 8.38. It may also be appropriate to allocate a wider variety of site types in terms of both size and location with small and medium sites delivering in the early years of the plan allowing sufficient time for larger strategic sites to come forward to meet needs in the second half of the plan period.

## **Affordable Housing**

- 8.39. Policies for affordable housing will be dealt with at Regulation 18 Stage 2 and it is noted in the plan that the Council still need to update their evidence on the viability of delivering affordable housing as well as all other proposals in the Local Plan 2040 (paragraph 5.31).
- 8.40. It is our strong view that the affordable housing policy should be set appropriately, with sufficient flexibility, and be based on a sound viability assessment.
- 8.41. The Council must ensure that the costs relating to biodiversity net gains, electric vehicle charging, sustainable design and construction and renewable energy are properly considered in the viability assessment in addition to the costs associated with current and future national policies such as the future homes standard. It will also be important to include a significant buffer in the viability assessment to take account of high, currently unknown, abnormal and infrastructure costs. The Council are also encouraged to use the upper end of any of the ranges suggested with regards to fees and profit margins which will vary from developer to developer. The approach to land values needs to be a balanced approach and recognise that there will be a point at which land will just not come forward if values are too low. Lastly, any requirement for First Homes should be considered in the viability assessment.

- 8.42. In terms of the threshold of the affordable housing policy, it is noted that the current threshold in the adopted policy is 15 units, so if the Council are going to consider changing the threshold as the consultation document indicates they will (paragraph 5.31), then this will need to be factored into the viability assessment.
- 8.43. Notwithstanding these comments, Peel reserves the right to comment on the affordable housing policy at Regulation 18 Stage 2.

#### **First Homes**

- 8.44. The plan document states that a specific policy for First Homes will be considered for inclusion in the next stage of the Local Plan 2040 as part of the review of the affordable housing policy (paragraph 5.32). Peel take no issue with a specific policy on First Homes so long as the policy is in line with the guidance provided in the Written Ministerial Statement published on 24 May 2021 and NPPG, and consideration in given to this requirement in the viability assessment.
- 8.45. Notwithstanding these comments, Peel reserves the right to comment on First Homes policy at Regulation 18 Stage 2.

#### **Rural Housing**

- 8.46. The plan confirms that the Council will review its policy on rural exception sites (RES) for Regulation 18 Stage 2 (paragraph 5.33). We have no issue with this but note that there will be a requirement to consider the viability of rural exception sites and whether allowing some market housing on these sites would help to facilitate them in line with the NPPF (paragraph 78). The Council are encouraged to produce a policy that specifies in further detail the proportions of market housing would be considered acceptable, and under what circumstance, the Council may also wish to consider whether alternative approaches to securing site viability could be pursued, in line with NPPG (para 67-013-20210524).
- 8.47. The plan also confirms that the Council will consider the inclusion of a policy on First Home exception sites (paragraph 5.34). We raise no issue with this but note that there will be a requirement to consider the viability of First Homes exception sites and it may be necessary to also include a small proportion of market housing to ensure the overall viability of such sites, as set out in the PPG (para 70-027-20210524). Such policies should also allow sufficient flexibility for applicants to alter the proportions of affordable housing to include other affordable housing products where local evidence suggests that a significant local need exists for one or more other forms of affordable housing, as also set out in NPPG (para 70-029-20210524).
- 8.48. The consultation document says that the Council will also consider a review of specific policies for rural housing at Regulation 18 Stage 2 (paragraph 5.36). Again, we have no issue with this so long as the policies are consistent with the NPPF (paragraphs 78 to 80) and the Council take note of the guidance in NPPG (para 67-009-20190722 and 67-010-20190722).
- 8.49. Notwithstanding these comments, Peel reserves the right to comment on rural housing policy at Regulation 18 Stage 2.

## Housing Mix

- 8.50. The plan states that the Regulation 18 Stage 2 will consider whether a specific policy is needed on the mix of homes, for both private and affordable housing, informed by the outcomes of the SHMA with regard to the number of bedrooms and type of housing (paragraph 5.38).
- 8.51. We note the outcomes of the SHMA and consider that a suitable housing mix should be provided on individual sites. If the Council consider it necessary to have a specific policy on housing mix, then Peel considers that the policy should be sufficiently flexible and allow for a suitable housing mix that is based on up-to-date evidence and local circumstances at the time of making an application. Indeed, the SHMA itself notes that the Council should be flexible to a different mix where specific local characteristics suggest, and that the mix of units on each site will need to be considered on its own merits taking account of site characteristics and the character of the area whilst (SHMA, paragraph 6.43).

## Specialist Housing

- 8.52. The plan notes that at Regulation 18 Stage 2 the Council will consider whether specific policies are needed to meet the housing needs of older people and those who require specialist housing and housing for particular household groups (paragraph 5.39). Peel fully supports the provision of housing for older people, noting that the NPPF (paragraph 60) requires that the needs of groups with specific housing requirements are addressed and that the needs for different groups in the community to be assessed and reflected in planning policies (paragraph 62). Peel accepts that there is a need for such housing in Andover and when devising such policies, the Council will need to take account of the guidance in NPPG which sets out that strategic policy-making authorities will need to consider the extent to which the identified needs of specific groups can be addressed in the area, taking into account:
- The overall level of need identified using the standard method (and whether the evidence suggests that a higher level of need ought to be considered);
  - The extent to which the overall housing need can be translated into a housing requirement figure for the plan period; and
  - The anticipated deliverability of different forms of provision, having regard to viability (NPPG para 67-001-20190722).
- 8.53. The SHMA includes an assessment of the need for specialist accommodation for older people and the Council will need to take account of its findings when devising a suitable policy for specialist housing, notably that:
- It is important to recognise that the viability of extra care housing will differ from general mixed tenure development schemes, and there are practical issues associated with how mixed tenure schemes may operate (SHMA, paragraph 7.54).
  - There is a need for viability evidence to specifically test and consider what level of affordable housing could be applied to different forms of older persons accommodation, potentially making a distinction between general market housing; retirement living/sheltered housing; and extra care/housing with care. It may well be that a differential and lower affordable housing policy is justified for housing with care (SHMA, paragraph 7.56).

- Developers of extra care schemes can struggle to secure land when competing against mainstream housebuilders or strategic land promoters and one way of dealing with this is to allocate sites specifically for specialist older persons housing. There could be benefits of doing this through achieving relatively high-density development of land at accessible locations, and in doing so, releasing larger family housing elsewhere as residents move out (SHMA, paragraph 7.57).

8.54. The Council will also need to take account of the NPPF (paragraph 65) which says that that exceptions to the 10% requirement for affordable home ownership should also be made where the site of proposed development provides specialist accommodation for a group of people with specific needs (such as purpose-built accommodation for the elderly).

8.55. The plan suggests the Council will also consider whether the Local Plan 2040 should include a policy on internal space standards (higher national described space standards) (paragraph 1.40). We would stress at the outset that any introduction of internal space standards needs to be fully justified by a robust evidence base, which is currently lacking. These are optional standards and as outlined in the NPPG the Council must take account of the following areas:

  - *Need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
  - *Viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwelling on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
  - *Timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions (NPPG para 56-020-20150327).*

8.56. The consultation document also says that the Council will consider whether the Local Plan 2040 should include a policy on accessibility standards for new housing (paragraph 1.40). Peel has no strong view on this but note that these are also optional standards and as outlined in the NPPG the Council must take account of the following:

  - *The likely future need for housing for older and disabled people (including wheelchair user dwellings).*
  - *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*
  - *The accessibility and adaptability of existing housing stock.*
  - *How needs vary across different housing tenures.*
  - *The overall impact on viability (NPPG para 56-007-20150327).*

8.57. The SHMA includes an assessment of the potential requirements for housing to be built to M4(2) (accessible and adaptable dwellings) and M4(3) (wheelchair standards) housing technical standards and identifies a clear need to increase the supply of both (SHMA,



paragraph 48). The Council will need to take account of the findings in the SHMA when devising a suitable policy for accessibility and wheelchair standards, notably that:

- There is clear justification for the delivery of M4(2) homes, subject to viability and site suitability, and the Council should ensure that the viability is tested as part of drawing together its evidence base (SHMA, paragraph 7.21)
- The Council could seek at least 10% of all new market homes as M4(3) homes and around a quarter in the affordable sector but the figures should reflect that not all sites would be able to deliver homes of this type (SHMA, paragraph 7.66).
- It may not be possible for some schemes to delivery M4(3) homes due to built-form, topography, flooding etc. and the provision of this type of property may in some cases challenge the viability of delivery given the reasonably high build cost (SHMA, paragraph 7.67).

## 9. Conclusions

- 9.1. This representation has reiterated our previous submissions in demonstrating that the Bere Hill Farm site is an available, suitable and deliverable site which forms an obvious infill opportunity to the south east of Andover, given it is surrounded by existing development and the A303 Andover bypass. Full details of the site are contained in the Development Framework at **Appendix 1**, which is supported by detailed technical work on Landscape and Ecology matters contained in **Appendices 2 & 3**.
- 9.2. We also confirm that Peel has the ability to open up sites ensuring immediate delivery themselves through their new housebuilding arm, Northstone, working with partners thus providing guaranteed end users for the site if required, which further boosts the deliverability credentials of the site. This could also allow Peel to partner up with Registered Providers at the outset, if required, to ensure delivery of the required levels of affordable housing.
- 9.3. It has also shown how Andover is the principal settlement within Test Valley with the capacity for significant further growth, and although this growth has plateaued in recent years due to the COVID pandemic, Andover previously had one of the highest rates of jobs growth in the whole LEP area and should grow strongly again as the economy returns to normality, with new residential/ mixed use development having the potential to be a significant catalyst for this.
- 9.4. This suggests that the housing requirement within the emerging plan should be increased to align with this level of jobs growth, which exceeds the current standard methodology (541/553 dap) and adopted requirement (588 dpa). There are other indicators that would support an increase in the housing requirement, including evidence of mounting unmet need within the wider South Hampshire region and various strategic growth strategies in effect; however the most notable indicator is past delivery, which has seen Test Valley average 843 completions a year since 2014 over 43% higher than the adopted plan requirement and 56% higher than the proposed SM requirement of 541 dpa.
- 9.5. In terms of the distribution of the emerging housing requirement, it is our view that growth should be focussed on allocations in the existing main settlement areas such as Andover, as this is clearly the most sustainable location, with a large Town Centre, access to the national rail network, and a good range of services and facilities. Historic evidence also suggests that large allocations within the main settlement areas provide the best opportunity for maintaining high levels of affordable delivery.
- 9.6. Within Andover, the Bere Hill Farm site (and adjacent land) becomes the next obvious choice for allocation, given it scores well in the sustainability appraisal due to its direct connections with the Town Centre and containment by existing development and the A303.
- 9.7. Whilst there have been historic issues raised around the topography of the site in respect of the Andover Bowl, a comprehensive landscape and visual analysis has demonstrated that the development of this site is entirely acceptable from a landscape perspective, subject to sensitive masterplanning and landscaping as incorporated into the current masterplan.
- 9.8. In light of the above, we respectfully request that the Council considers this site for allocation in the emerging Local Plan and ensure the site is objectively assessed in any future evidence base review accordingly.



## Appendix 1: Summary Development Framework



## Appendix 2: Landscape Statement





## Appendix 3: Preliminary Ecological Assessment

Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004

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