
Representations to Regulation 18 Stage 1 Consultation Test Valley Borough Council

Representations

Land at Upton Lane, Upton, Nursling

Prepared for: Crest Nicholson Partnerships and
Strategic Land



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Executive Summary

Crest Nicholson Partnerships and Strategic Land ('CN') is promoting the land north-west of Upton Lane to Test Valley Borough Council ('TVBC') for residential-led development of circa. 300 dwellings. The site comprises approximately 10 ha of land and is made up of several pastoral fields currently in use for horse grazing.

The standard methodology dictates a local housing need for TVBC of 541 dwellings per annum which equates to 10,820 homes over the proposed plan period 2020 to 2040. Strategic Policy 6 of the LP40 sets out that of this requirement, Southern Test Valley ('STV') has a minimum housing need of 4,653 dwellings over the plan period of 2020 to 2040 (43% of the total need). The Council note that there is currently a residual requirement of 948 homes in STV. We note that due to the revised affordability ratios published 23 March 2022, the minimum standard methodology figure will increase to 553 per annum. This will result in a greater residual requirement in STV, which the Council will have to take into consideration when allocating development sites in order to truly meet the need of the area.

CN is in support of the Council's recognition of the standard methodology as a minimum figure for housing need, however place emphasises on the need of the Council to consider a non-implementation buffer of c. 10% due to the high reliance on current commitments and for the Council to consider the un-met need of Southampton and the New Forest. Without proper consideration and incorporation of these aspects into the LP40, the Local Plan will under deliver against housing need and will thus be considered unsound.

CN consider the site is an excellent opportunity to help contribute towards the housing need of Southern Test Valley and the wider region due to the reasons highlighted below:

- The site is highly self-contained visually and is located in a sustainable location outside any Local Gap, with established employment, education and retail areas in Nursling and Lordshill in close proximity providing a realistic opportunity for a significant number of residents to meet their day-to-day needs by walking or cycling.
- The site is adjacent to the existing settlement boundary of Nursling and Rownhams a classified Tier 2 settlement under Policy SSP1 and is thus deemed a suitable location for development due to the presence of key facilities and infrastructure.
- The site does not have any flood risk or drainage constraints and considerations that would restrict the site from being suitable for residential development of circa. 300 units
- The site is not considered to be subject to any overriding ecological constraints nor does the site contain any statutory environmental designations, and thus the proposed development of the site is considered to be readily deliverable in ecological terms. Further, there are significant opportunities to deliver strategic habitat creation and enhancements, and bring the site into active management to benefit biodiversity.

CN is a FTSE-250 developer with a strong reputation for promoting strategic land and delivering high-quality homes within well-conceived masterplans. CN is committed to the delivery of a high-quality development and are committed to reducing carbon emissions and waste in their business activities and have established new carbon and waste reduction and renewable energy targets.

1. Introduction

Purpose

- 1.1. This document provides representations on behalf of Crest Nicholson Partnerships and Strategic Land ('CN') to Test Valley Borough Council ('TVBC') on the Draft Local Plan 2040 ('LP40') in relation to the land at Upton Lane ('the site'). The LP40 is the latest Regulation 18 public consultation on the emerging Local Plan for Test Valley. This Stage 1 consultation focusses solely on strategic matters setting out draft policies, proposals and future challenges. The LP40 covers a range of topics including the draft spatial strategy, the proposed settlement hierarchy, and strategic proposals such as identifying the Borough's needs for housing, employment, retail and other uses.
- 1.2. CN over the last few years has promoted the site known as Land at Upton Lane, identifying this site as being strategically well placed within the sub-region for contribution towards housing growth. The site was submitted by CN to the SHELAA in 2021 and provided the reference '385'. The site has an assessed capacity of up to 380 dwellings.
- 1.3. The site lies immediately to the south of the A3057 roundabout and east of the M271. The site is bounded by the A3057 to the east and Upton Lane to the south. The site is identified in the 2021 SHELAA as available, achievable and deliverable, and could commence in the next five years. A vision document for the site is provided in Appendix 6 of this representation alongside technical inputs.
- 1.4. The site is located in the administrative boundary of Test Valley Borough Council (TVBC), however it is very close to the district boundary with Southampton City Council (SCC). The promotion strategy for the site therefore encompasses the emerging plans of both Local Planning Authorities (LPAs) with the aim of gaining an allocation in TVBC's new Local Plan, whilst also potentially helping to meet any unmet need of Southampton City Council and the New Forest.

Figure 1 – Land at Upton Lane



- 1.5. This representation provides an evidence based overview of the potential for residential development at the land at Upton Lane, having regards to national policy, the emerging Local Plan strategy and housing supply in TVBC.
- 1.6. TVBC adopted their Local Plan on 27 January 2016 and sets out the key elements of the TVBC vision for development until 2029. The Council committed to a LP40 which is due to be adopted in Autumn 2025 (in accordance with the currently approved Local Development Scheme). The LP40 will set out policies and guidance for development of the Borough over the next 15 years to 2040, in line with the minimum requirements set out in the National Planning Policy Framework ('NPPF') 2021.
- 1.7. Within this representation, Savills demonstrate that TVBC should positively plan for housing growth with a provision above the standard methodology, which is considered a minimum requirement figure. This conclusion is drawn due to the issues surrounding housing need and supply, namely due to potential for non-implementation, affordable housing delivery, concealed households and unmet need in the adjacent Partnership for South Hampshire (PfSH) authorities Southampton and the New Forest. It is considered that the land at Upton Lane provides a sound sustainable opportunity to contribute to the much-needed housing requirement in Southern Test Valley (STV) and should be allocated.

Representations Structure

1.8. This representation document is structured as follows:

- **Section 2** sets out the background information on the Land at Upton Lane site and presents a summary of the technical inputs regarding transport connectivity, ecology and landscaping and flood risk and drainage.
- **Section 3** reviews the draft Test Valley Local Plan 2040 Regulation 18 Stage 1 consultation document and sets out how the land at Upton Lane is the optimal site to meet the housing need of Southern Test Valley and support the housing need of the Partnership for South Hampshire.
- **Section 4** concludes this report.

2. Overview of the site and concept

Overview of the site

- 2.1. The land at Upton Lane site comprises c. 12.4 ha of land located to the east of the A3057 roundabout and east of the M271, circa 3 miles south of Romsey and 5 miles north west of Southampton City Centre [Figure 1]. The site is located in the countryside adjacent to the hamlet of Upton hamlet, which is within Nursling and Rownhams settlement, north-west of Southampton.
- 2.2. The site comprises a number of pastoral fields in use for horse grazing that lie between the M271 and Upton Lane. The Site itself is highly enclosed, medium scale and is typical of the surrounding arable and pastoral landscape with a high degree of mature mixed deciduous woodland plantations.
- 2.3. The site is identified in the 2021 SHELAA as available, achievable and deliverable, and could commence in the next five years. The site is largely unconstrained as set out below:
 - The site is not located within any of the Strategic or Local Gaps;
 - The site is not subject to any qualitative landscape designations at a national or local level;
 - The site is not subject to any open space, local gap or heritage designations;
 - The site is self-contained visually being highly enclosed and gently undulating;
 - There are areas of non-ancient woodland along the north-eastern and south-western boundaries which screen the site. There are existing trees interspersed within the site. There are no areas of ancient woodland on or adjacent to the site;
 - There are no Public Rights of Way within the site;
 - No statutory environmental or wildlife designations are located within or immediately adjacent to the site. The nearest statutory designation is River Test SSSI, located approximately 775m to the west of the site. Fir Copse SINC is located to the west of the M271; and
 - The site and surroundings are in Flood Zone 1. There are very small areas of the edge of the site identified by the Environment Agency as low risk from surface water flooding.
- 2.4. The site is located in the administrative boundary of Test Valley Borough Council (TVBC), however it is very close to the district boundary with Southampton City Council (SCC). Spatially, the area in which the development is located also forms part of the Partnership for South Hampshire (PfSH).

Masterplan strategy

- 2.5. A landscape led approach delivering sustainable development principles are at the forefront of the masterplan concept for the site, guided by the technical assessments of the landscape and biodiversity qualities of the site, including topography, woodland and hedgerows evidenced by the Landscape and Visual Technical Note produced on behalf of CN by Aspect Landscape Planning (March 2022) [**see Appendix 3**]. As a result of these technical considerations the masterplan vision responds to the particular characteristics to the site to ensure delivery of a mixed-use scheme that is valued in terms of its aesthetic qualities, residential amenity and wider permeability credentials.

- 2.6. The proposal would deliver housing, to meet Test Valley Borough Council's needs, interlaces with a network of landscaping and attractive green spaces. The development would comprise an arrangement of permitter blocks that have been shaped around the existing site contours and retained green infrastructure which will be enhanced and consolidated to provide extended wildlife habitats and recreational opportunities.
- 2.7. The framework is founded on the principles of townscape and legibility, and the development will embrace and perpetuate the character of Upton, including use of appropriate materials and detailing as part of creating a high quality and visually district development with a strong sense of place.
- 2.8. As set out in the Vision Document, views of the site are highly localised due to the extent of mature established woodland and vegetation alongside relatively level topography. As a result, views from the north and west are largely restricted. Further, opportunities exist for the reinforcement of the southern and eastern boundaries with new hedge and tree planting to create a more robust and defensible green edge.
- 2.9. Ultimately, the development is capable of delivery c. 300 residential dwellings with the retention of existing landscaping and if required provision of SANG (including natural and semi natural open space).

Transport connectivity

- 2.10. RPS produced a Transport Report dated 25 February 2022 on behalf of CN for the promotion of the land at Upton Lane for residential development. The report discusses the policy context, baseline condition, the development proposal and its impacts [see Appendix 5].
- 2.11. The report sets out that the site is located in a sustainable location, with established employment, education and retail areas in Nursling and Lordshill providing a realistic opportunity for a significant number of residents to travel to these destinations without the need to use a motor vehicle.
- 2.12. The RPS transport study, shows accessibility according to 5-minutes bands. Both Nursling and Rownhams St John's primary school is accessible by foot or cycle, as is Nursling & Rownhams Village Hall. A larger supermarket, Sainsbury's, as well as Lordshill Health Centre, are located approximately 2km away [paragraph 3.25]. These distances are in line with the Manual for Streets (2007) which promoted the concept of walkable neighbourhoods, and these are typically characterised by having a range of facilities within 10 minutes' walking distance (c. 800m) of residential areas. The MfS also advised that 800m should not be seen as "an upper limit" [paragraph 4.4.1] and refers back to the 2km advice in PPG13.
- 2.13. While a number of the local facilities are accessible on foot and bicycle, any residual car journeys made in connection with the above destinations would lead to comparatively shorter journeys that would be the case for other locations in the borough [paragraph 3.27].
- 2.14. This is particularly relevant to the significant employment opportunities available at the Nursling Industrial Estate, located immediately to the west of the M271 (South). These facilities are accessible by bicycle, largely on a traffic free route via Nursling Street, as well as by a short car journey [paragraph 3.28].
- 2.15. The Site is well served by existing public transport links, with various bus services operating in the area. The existing bus stops 200m from the site (known as Upton Crescent) are used by Bluestar 5A and 504

services [paragraph 6.6]. There is an opportunity for increasing the frequency of services that stop at the Upton Crescent bus stops and potential for service diversion upon implementation of the proposed development [paragraph 6.7].

- 2.16. The Bluestar 4 service, operating between Romsey and Southampton currently serves Nursling with the closest bus stop to the proposed development being accessible from The Balmoral public house, which is located on the A3057 Romsey Road. The service operates on a half hourly frequency for most of the day Monday-Friday and hourly on Sunday [paragraph 6.6. bullet 1].
- 2.17. In terms of the wider road network, the M271 motorway provides a means of connection to the Strategic Road Network (SRN), from its roundabout with the A3057 Romsey Road to a grade separate roundabout junction with the M27.
- 2.18. The primary access in and out of the site would be from the A3057 Romsey Road. Romsey Road is a rural road with a 7.0-7.3m wide carriageway. It is subject to a 30mph up to a point approximately 50m to the west of Upton Lane, where it transitioned to 60mph. To the south of its junction with Upton Lane, the carriageway is flanked by footways of 1.2-1.5m in width.
- 2.19. The Romsey Road bridge of the M27 has been recently replaced. This scheme has seen a reduction in the width of the carriageway which has created space to provide greater verges and a wider combined footway/cycleway on the eastern side of the road, enhancing the standard of connection for cyclists and pedestrians from Upton wishing to access facilities in Nursling.
- 2.20. On the basis of the above, there are no technical transport aspects that would constrain the ability of the development to come forward as intended and contribute towards the earliest delivery of housing to meet the demand identified in the TVBC Local Plan Review process [paragraph 7.2].

Ecology

- 2.21. Aspect Ecology produced an Ecological Feasibility Appraisal for CN in regard to the promotion of the land at Upton Lane (February 2022) [**see Appendix 1**].
- 2.22. The Aspect Ecology report set out that most of land is grassland of limited ecological value and habitats of elevated ecological value at the site are generally limited to the onsite woodlands and boundary hedgerow [paragraph 4.11] in line with this the proposed masterplan has sought to retain these features under the scheme.
- 2.23. As set out in the supporting ecology report, the site is not considered to be subject to any overriding ecological constraints, and the proposed development of the site is considered to be readily deliverable in ecological terms.
- 2.24. There are significant opportunities to deliver strategic habitat creation and enhancements, and bring the site into active management to benefit biodiversity [paragraph 5.2].

Energy/sustainability strategy

- 2.25. CN place emphasis on the importance of locating development in the right place in order to reduce climate change and produce sustainable developments. Justification for the suitability of the site to deliver against these factors is set out below.
- 2.26. The proposal for Upton will be of a high-quality sustainable design and construction (in accordance with the prevailing national standards), which will be demonstrated through a Sustainable and Energy Assessment. The proposal offers the opportunities to explore methods to minimise the embodied carbon the proposed development, both through an examination of the materials used as well as the design of flexible and adaptable buildings that can facilitate change of use or extension of buildings in the future.
- 2.27. The sites proximity and accessibility to Southampton will encourage sustainable transport decisions, further supported by prioritising walking and cycling routes to nearby facilities and amenities. A strategy would be development for implementing EV infrastructure within the development in accordance with national and local policy. Several additional sustainable initiatives will be explored including green and brown roofing in addition to bike club schemes.
- 2.28. Thus, we consider that due to the reasons set out in this representation than the site is an optimal opportunity to deliver sustainable dwellings in STV.

Flood risk and drainage

- 2.29. WSP has produced a Flood Risk and Drainage Note on behalf of CN for the land at Upton Lane (February 2022) [see **Appendix 4**]. The note sets out that the assessed risk posed to, and/or from, the proposed development in exacerbating flood risks within the catchment to neighbouring property, from tidal / coastal, fluvial, sewer and drainage infrastructure and artificial sources is assessed to be negligible to low [paragraph 6.1.5].
- 2.30. The WSP study has reviewed national, regional and local policy in relation to flood risk and drainage and an assessment has been undertaken on how policy can be applied to ensure the sustainability of the proposed development. The review of relevant policy confirms that there are no perceived “showstoppers” that would render the site unsuitable for development in terms of flood risk and drainage, subject to the usual mitigation strategies. This has been achieved by allocating all more vulnerable uses in Flood Zone 1 as well as outside areas of surface water flood risk, and by ensuring that the development surface runoff is attenuated to pre-development greenfield rates [paragraph 6.1.7].
- 2.31. As demonstrated above, the technical assessment demonstrates that the site does not have any flood risk or drainage constraints and considerations that would restrict the site from being suitable for residential development of circa. 300 units.



Summary of benefits of the Land at Upton Lane development

2.32. The principal benefits of the development in economic, social and environmental terms (the three strands of sustainable development identified by the NPPF) are summarised in Table 1.1 below.

Table 1.1: Summary of key benefits

NPPF Paragraph 7	Key Benefits
Economic Role	<ul style="list-style-type: none"> • inherent economic value brought about by development / construction; • investment in infrastructure; • provision of housing within the five-year supply; and • increase in the number of economically active residents in the area
Social Role	<ul style="list-style-type: none"> • providing housing in a co-ordinated manner with effective mix (including affordable dwellings) to reflect identified needs; • locating homes in sustainable locations, aligned with existing public transport and close to essential services, facilities and infrastructure to promote healthy lifestyles and a high quality of life; • potential to provide new and enhanced community facilities for new and existing residents of Upton and the surrounding area; and • development of a comprehensive landscaping scheme that enables residents to access a range of open spaces and leisure route that offer opportunities for outdoor recreation and play to encourage healthy living and wellbeing
Environmental Role	<ul style="list-style-type: none"> • promoting a landscape-led approach including provision of semi-natural greenspaces; • ecological enhancement and biodiversity net gains of at least 10% through the creation species-rich greenspaces and new tree and shrub planting; • all homes and development will be designed to be future proofed against a changing climate • incorporation of SuDS with permanent water features will create high biodiversity wetlands and reed bed habitat and focal points for walkers; • elimination of emerging needs through a fabric first approach that incorporates passive and active design measures associated with massing and orientation to control daylight, shading and solar gain; and • utilisation, wherever feasible, of renewable and low carbon energy sources, such as air or ground source heat pumps and photovoltaic (PV) panels.

3. Representations on the draft Test Valley Local Plan 2040

Overall response to Test Valley Local Plan 2040

3.1. This section sets out CN's principal comments on the draft Test Valley Local Plan 2040 (LP40).

Comments on Chapter 1: Introduction

- 3.2. Overall CN welcomes TVBC's approach to the Local Plan, in terms of focusing on strategic matters at this stage before then refining those strategic matters and progressing into site-specific proposals in Stage 2. However, we highlight a number of overarching concerns, which we discuss in these representations.
- 3.3. Paragraph 1.37 states that the adoption of the Local Plan is expected to take place in 2025, and this is also set out in Figure 1.2. It is crucial that the current timetable is maintained, and that adoption of the draft Local Plan does not slip the Plan Period beyond 2040. The current Local Plan was adopted in January 2016. Adoption of the draft Local Plan in Q3 2025 would be almost 10 years later and with only 4 years remaining on the current plan to 2029.
- 3.4. It is noted in Paragraph 1.38 that 'where appropriate, evidence base studies have and will be prepared jointly with neighbouring authorities'. CN recognise the work the Council has undertaken with PfSH however continue to stress the importance of the adopted Statement of Common Ground (SoCG) and the wider contribution to unmet need and Duty to Co-operate.

Comments on Chapter 2: Visions, Key Challenges and Objectives

- 3.5. As emphasised in paragraph 2.10, the Government is encouraging local planning authorities to continue reviewing and updating their local plans. The current timetable should therefore be adhered to, and further delay avoided.
- 3.6. Paragraph 2.18 sets out that TVBC are committed to engaging with their neighbouring authorities and states that the Council works with authorities across South Hampshire including Hampshire County Council through the PfSH on a range of strategic planning matters. The Council draw reference to the to the PfSH joint Statement of Common Ground, which looks forward to 2040. CN support this approach and the Duty to Cooperate across the area in order to meet the areas current assessed housing shortfall of c. 13,000 dwellings. We note that the Reg 18 is largely silent on contribution to this unmet need.
- 3.7. CN supports the overall vision set out under paragraph 2.21. The site can help to achieve the Council's aspirations by delivering high quality homes in a sustainable location, that will meet a range of needs and aspirations, including affordable housing and First Homes. The scheme would also provide local services for Upton and the wider Nursling and Rownhams settlement.
- 3.8. Paragraph 2.23 asks whether there are any other local priorities that should be highlighted in the Vision. CN highlight that is important to provide facilities for the smaller hamlets, such as Upton. A residential led

scheme at the site would deliver local provision for local residents, to supplement the nearby services and facilities in the wider Nursling and Rownhams settlement and in Lordshill, Southampton.

Climate Change

- 3.9. The Council set out in the LP40 that climate change is one of the greatest challenges which we face. Paragraph 2.27 states that the LP40 will contribute to reduced emissions through minimising the impact development has on emissions and adaptation to manage impacts.
- 3.10. CN are in complete support of the Council's climate change objective and recognise their responsibility to adapt operations and the homes they build to help tackle climate change. CN are committed to reducing carbon emissions and waste in their business activities and have established new carbon and waste reduction and renewable energy targets. It is important to reduce the impact CN homes and developments have on the environment, create developments that are future proofed for a changing climate and deliver social value for customers and communities.
- 3.11. CN were identified as a Climate Change Leader by the Financial Times due to their company wide initiatives **[see paragraphs 3.32 to 3.37]**.

Our Communities

- 3.12. CN supports the Council's objective set out on page 20 to deliver and strengthen sustainable, cohesive and healthy communities, and meeting the daily needs of local communities and residents. The site is a residential led proposal that can deliver new homes for local people in a sustainable location, and facilities and services to support the local community.
- 3.13. CN agrees with and support the statement set out in paragraph 2.28 that the sustainability of local communities is linked to their ability of having easy and safe access to facilities, services and amenities to serve economic and social needs, including shopping recreation, education and employment. The site is located within walking and cycling distance of a range of facilities, services and amenities including all those listed **at paragraph 3.27**. Thus, the site can assist in providing easy and safe access to local amenities and facilities and is in line with the transport and movement priorities set out in the LP40 by reducing the need for travel by private car and encouraging active and sustainable travel (paragraph 2.63).

Ecology and Biodiversity

- 3.14. The Council note in the LP40 that they are committed to conserving and enhancing biodiversity through enhancing the connectivity, quantity and quality of ecological and green infrastructure networks.
- 3.15. CN are supportive of BNG and have examples of implementation at the pilot authority, Warwick LPA, on sites at Westwood Heath Road and Montagu Road. Aspect Ecology carried out several BNG assessments for both sites, to establish the most ecologically beneficial proposals that the project could deliver. A range of mitigation and enhancement measures were implemented across the site to increase biodiversity, to benefit local populations. On-site measures to reduce biodiversity loss comprise provision of a range of new habitats and faunal enhancements and their ongoing management and maintenance. This includes

several areas of wildflower grassland, new tree planting, creation of diverse scrub habitats and extensive new hedgerow creation. In addition to these quantifiable habitat gains that can be reflected in the BNG calculations; additional wildlife enhancements were delivered under the consented development. These include providing numerous bat and bird boxes, which will be installed upon retained trees and new buildings, with hibernacula and log-piles created to benefit invertebrates, amphibians, and nearby reptiles. The consented developments, in Warwick LPA, represents a material opportunity to secure meaningful gains for biodiversity, which will be secured for the long-term through positive ecological management.

- 3.16. CN would be committed to delivering a scheme at the site with similar credentials as set out above. Feasibility of this commitment is set out in the Aspect Ecology report (February 2022) which notes there are significant opportunities to deliver strategic habitat creation and enhancements, and bring the site into active management to benefit biodiversity [paragraph 5.2].

Design

- 3.17. Paragraphs 2.52 and 2.53 relate to design, the Council states that development will be required to deliver safe, attractive, integrated and well-designed environments that take account of and respond positively to local context and character. Placemaking and Quality is one of Crest Nicholson's strategic priorities, creating attractive and vibrant communities with a focus on sustainability. Therefore, the objectives of promoting successful design, and creating healthy, environmentally responsive, sustainable, and distinctive places with a consistent and high-quality standard of design are supported.
- 3.18. As demonstrated in the appended vision document, the topography and landscape of the site provide a rich canvas for development. The emerging masterplan will encourage new development to respond positively to these features. Any scheme will also provide high quality streetscapes that will create a development that feels distinctive and responds to local context. CN are committed to ensure a high-quality master planned design. The work completed to date demonstrate how the scheme fosters beauty and quality design as a key pillar.
- 3.19. Design guides and codes can assist in setting the parameters for good placemaking, but it is important that these retain flexibility and provide the appropriate level of detail. The design process is iterative and requires pragmatism. Design codes and guides will not always be required, and this should be acknowledged. Where design documents are needed, they should focus on the structure of the place and measurable objective requirements rather than architectural style, materials and appearance. The best design documents establish requirements such as points of access, key spaces and block structure rather than specifying every detail. It is essential that developers are included and involved in the design code process. Deliverability should be at the heart of the design process to ensure that development remains viable.

Housing

- 3.20. The LP40 sets out that Council is committed to providing a range of homes that are fit for purpose and designed to meet the needs and aspirations of different groups within the community, including a range of affordable housing and homes that meet the needs of an ageing population. Paragraph 2.54 notes the local housing need figure of 541 homes per annum should be treated as a minimum housing need, as stated in

paragraph 2.54. The Government introduced the Standard Methodology for Housing Need to provide a standard formula for the **minimum** number of homes expected to be planned for, in a way “*which addresses projected household growth and historic under-supply*” (Planning Practice Guidance, Paragraph, 002, Ref: 2a-002-20190220).

- 3.21. Development can provide local market and Affordable Housing, new employment opportunities, improved infrastructure, including walking, cycling, and public transport upgrades and it can, as mentioned before, support local services and facilities. New development, well designed, can make a positive addition to existing communities and it is important that a number of existing settlements gain this benefit. Housing growth at Upton can support the sustainability of the settlement by:
- Increasing opportunities for homeownership and renting for younger people, families, and an increasingly ageing population that may want to stay in, or move back to, their communities.
 - There is a need for affordable open market housing which is currently not being met.
 - Increasing access to education and varied employment opportunities in accessible reach of where people want to live.
 - Supporting existing and/or enhanced key services and facilities across the settlement hierarchy, such as local shops, community centres, public houses, broadband connectivity, local employment opportunities, and the viability of public transport connections to towns and urban areas.

Comments on Chapter 3: Spatial Strategy

Sustainable Spatial Strategy

- 3.22. CN support the proposed spatial strategy and settlement hierarchy set out at paragraphs X to X. In terms of responding to the challenges of climate change, the most effective decisions that the planning system and development plan can make is locating development in the right place to create the conditions for more sustainable transport choices. In order to respond to the challenges of climate change and to develop more sustainable patterns of movement, investment should be directed towards delivering development in close proximity to services, facilities and public transport routes. A strong mix of uses creates the opportunities for journeys to be made on foot and good public transport create viable alternatives to the car for journeys to work, retail and leisure destinations.
- 3.23. There are residual benefits that flow from getting development in the right place from the outset and directing growth to locations that benefit from existing or planned for facilities, amenities and infrastructure. Such locations that do not require significant investment in transport infrastructure are better able to deliver social infrastructure such as affordable housing to meet the challenges of the housing crisis, open space and public realm which contribute to social health and wellbeing and facilities such as schools and health facilities.

Settlement Hierarchy

- 3.24. The Council identify the importance of the settlement hierarchy at paragraph 3.19 of the Draft Local Plan 2040 Regulation 18 Stage 1 document. The spatial approach adopted in the Reg 18 follows the pattern of

the settlement hierarchy which is identified in terms of access to services and facilities within each settlement or in nearby larger towns or villages. This approach is in line with the NPPF which states that strategic policies should set out an overall strategy for the pattern and scale of development and that the purpose of the planning system is to contribute to the achievement of sustainable development. CN are in support of the spatial approach adopted by the Council.

- 3.25. The site is currently identified within the countryside but adjacent to the existing settlement boundary of Nursling and Rownhams (Upton hamlet), a classified Tier 2 settlement under Policy SSP1. It is noted that the settlement hierarchy is a key policy to delivering the spatial strategy, the LP40 sets out that the next stage of Reg 18 will evolve to include guidance on the level, type and scale of growth at each tier in the hierarchy.
- 3.26. A Tier 2 settlement includes extensive range of facilities and services, including the six 'key facilities' to meet the day-to-day, basic needs of local communities, and good public transport provision. The six 'key facilities' identified in the settlement hierarchy assessment are all within 1 mile of the site Land at Upton Lane in line with advice set out in PPG13:
- Food store – Co-operative, Nursling
 - Public house – The Horns Inn, Nursling
 - Primary school – Nursling C of E Primary School, Nursling, Rowhams St John's CE Primary School
 - Outdoor sports facility – Romsey Golf Club, Upton, Nursling Skate Park and Nursling Play Area, Nursling
 - Community or village hall – Nursling & Rownhams Village Hall, Nursling
 - Place of worship – The Parish Church of Saint John the Evangelist, Rownhams
- 3.27. CN are in support of the proposed settlement hierarchy rankings and believe that Tier 2 settlements are suitable to accommodate a substantial proportion of growth.
- 3.28. Based on the above we consider the proposed development site to be highly accessible to a range of local facilities by means of active travel allowing for the site to be classified as a sustainable development location.
- 3.29. Further, while a number of the local facilities are accessible on foot and bicycle, any residual car journeys made in connection with the above destinations would lead to comparatively shorter journeys that would be the case for other locations in the borough. This is particularly relevant to the significant employment opportunities available at the Nursling Industrial Estate, located immediately to the west of the M271 (South). These facilities are accessible by bicycle, largely on a traffic free route via Nursling Street, as well as by a short car journey, emphasising the suitability of this site in terms of both practicalities and sustainability credentials.

Comments on Chapter 4: Strategic Policy Framework

Strategic Policy 1 – Countering Climate Change.

Reducing Carbon Emissions from Development

- 3.30. Strategic Policy 1 (Countering Climate Change) notes that development will deliver a net zero carbon future through both mitigation and adaptation to climate change. CN are in support of SP1 and the Government's drive to reduce carbon emissions from new buildings in order to achieve the country's net zero deadline for 2050.
- 3.31. According to government statistics, the residential sector accounted for approximately 15% of the total UK greenhouse gas emissions in 2018. CN recognise that the industry can make a real difference by delivering homes in the future that are more energy and water efficient. The homes and developments CN build are all designed to deal with other climate-related risks such as overheating and flooding, evidenced by the fact that in FY20, CN homes were, on average, 7.5% more efficient than current regulations require.
- 3.32. An example of how CN design their homes to address climate-related risks is evidenced by the fact that homes are designed with water efficiency in mind. This has resulted in the average consumption of 105 litres per person per day in CN homes, this is lower than the building regulations requirement of 125 litres and significantly lower than the average UK homes which uses 140 litres. Further, CN are committed to utilise 100% renewable energy by 2025 and have signed up to the Business ambition for 1.5°C and joined the United Nation's Race to Zero campaign. This commits CN to reaching science-based net zero by 2050 at the very least.
- 3.33. The majority of CN's carbon footprint comes from material sourcing and CN's customers' use of homes. CN are therefore developing science-based targets across all emission scopes to accelerate decarbonisation through the supply and use chain. CN's current carbon emission targets are focussed on their own operations and relate to scope 1 and 2 emissions (scope 1 being direct emissions from sources in CN's control and scope 2 being indirect emissions from the generation of purchased electricity). CN have implemented several energy and fuel reduction initiatives and will continue to make further improvements, including increasing the proportion of biodiesel used, increasing the procurement of renewable electricity and continuing to drive efficiencies throughout the operation. Scope 3 emissions (other indirect emissions from sources outside CN's direct control – associated with supply chain and use of sold homes) account the most to the businesses carbon footprint. Due to the initiatives set out above CN were identified as a Climate Change Leader by the Financial Times.
- 3.34. Updates to Building Regulations in 2022 and the Future Homes Standard from 2025 will drive significant reductions in emissions associated with new homes built by CN, helping to reduce the carbon footprint for customers. From 2025, Future Homes Standard will require than new homes move away from fossil fuel heating and be future proofed with high levels of energy efficiency. Homes will be designed to achieve at least 75% lower carbon emissions than current Building Regulations. CN are active participants in the industry's Future Homes Hub, which is supporting the sector in delivering the Future Homes Standard. The

Hub is also engaging with Government and industry to deliver emissions reductions across the value chain, maximise resource efficiency and delivery biodiversity net gain.

- 3.35. CN are researching new technologies to further enhance the energy, carbon and water efficiency of their homes. The appended vision document highlights the forthcoming regulatory changes and illustrates what is likely to be included in a future home. CN already install energy and water efficient appliances, LED lighting, good levels of insulation and PV panels.
- 3.36. CN would employ all of the previously set out measures in a location where suitable alternative modes of travel to the private car already exist, allowing the development to be future ready. Thus, by allocating the land at Upton Lane for development, the Council would be aligning with their own goals set out in SP1.
- 3.37. Notwithstanding all of the commitments set out above, we consider the most effective contribution to reduce carbon emissions is to locate new housing in the right sustainable locations such as Land at Upton Lane to provide an alternative to the private car and to encourage active travel. Thus, we stress the importance of the focus on location when the Council are considering potential site allocations.

Biodiversity Net Gain

- 3.38. In line with the Environment Act, paragraph 4.39 outlines the requirement for development to deliver a minimum 10% net gain in biodiversity. However, this may result in viability implications for future developments. Delivering a 10% net gain will reduce the developable area and as such the capacity of that site. This may impact not only on viability but also on the number of sites needed by the Council to meet its development needs.
- 3.39. As set out at **paragraphs 3.15 and 3.16**, CN are supportive of the BNG requirement and have several examples of successful implementation. CN would employ these established methods of delivery BNG on site (i.e., habitats and faunal enhancement work) which would result in a beneficial ecological effect. As set out by the Aspect Ecology Report, the delivery of BNG and habitat enhancements is deemed achievable through active management.

Strategic Policy 2 – Delivering Healthy, Well-Designed Development.

- 3.40. CN support Strategic Policy 2 (Delivering Healthy, Well-Designed Development). SP2 states that the Council will require all development to achieve high quality design which will conserve and enrich the character and identity of the Borough. Bullet (i) of SP2 sets out that major development will need to take account of, and respond positively to, relevant local and national design guidance and codes. It is noted that the proposal will be designed in line with these criteria as set out in the appended vision document.
- 3.41. Paragraph 4.58 sets out that the Council will provide additional detailed policies within the Regulation 18 Stage 2 consultation.

Local Gaps

- 3.42. Paragraph 4.41 sets out that the Council will need to ensure that the development needs of the area are met in full prior to the consideration of gaps. It states that analysis of the importance of local gaps is set to take place during the supplementary stage of the Reg 18 Consultation. CN consider that preservation of gaps in this area is vital to the continued maintenance of the settlements character and pattern preventing settlement coalescence and protecting separate settlement identities.
- 3.43. We consider that land at Upton Lane presents an ideal opportunity to contribute to TVBC's housing need while preserving the character of the and is not located in a designated local gap. This is considered a unique opportunity to the land at Upton Lane evidenced by the vast majority of major sites in STV presented in the SHELAA being located within a local gap.

Comments on Chapter 5: Meeting our Needs

- 3.44. Chapter 5 sets out that a key part of delivering a sustainable pattern of development, is meeting the development needs of the Borough including our needs for housing, employment retail and other uses.

Housing Need

- 3.45. The standard methodology dictates a local housing need for TVBC of 541 dwellings per annum which equates to 10,820 homes over the proposed plan period 2020 to 2040. From the consultation document and supporting evidence it is clear that the Council are aware that this figure is a **minimum** requirement and that they must consider whether there are any circumstances which would indicate housing needs are likely to exceed past trends.
- 3.46. CN wish to draw the Councils attention to the updated affordability ratios published 23 March 2022. The update sees a rise in the affordability ratio of TVBC from 9.80 in 2020 to 10.60 in 2021. Savills analysis indicates that this will cause an increase to the minimum standard methodology figure to 553 per annum. It is vital that the Council take this into consideration when allocating development sites in order to truly meet the need of the area.
- 3.47. TVBC at paragraph 5.5 of the LP40 sets out that the Council has made a significant contribution to house growth and have consistently exceeded their current local housing target. CN wish to draw attention to the fact that the assessment of housing need across this plan period is 437 dpa, this is some 237 homes in excess of the current target and 80% of the minimum number of homes the Council is required to deliver. Thus, it is clear that delivery of such homes has been insufficient in the delivery and thus CN emphasise the importance of planning for the current need.
- 3.48. The SHMA (2022) sets out that at the time of writing there were 3,167 households in TVBC living in unsuitable housing. The SHMA notes that the greatest demand in Test Valley is for 3-bedroom market dwellings (40%) and 2-bedroom affordable homes (40%). CN are committed to providing a range of housing sizes and tenures on site in order to meet the local need.

Unmet Need

- 3.49. In the latest SHMA, the Council noted that there are no growth strategies or strategic infrastructure in place to drive growth beyond that resulting from the standard method. Concern is stated due to insufficient consideration of potential unmet needs from neighbouring areas.
- 3.50. Paragraph 5.12 states that at present there is no evidence of any unmet housing need in neighbouring local authority areas and that this will need to be kept under review. CN dispute this statement as based on the current levels of supply that there will be unmet needs in both Southampton and the New Forest over the plan period. This is evidenced by the Partnership for South Hampshire (PfSH) Statement of Common Ground (October 2021) which noted a shortfall of 7,345 dwellings in Southampton and of 5,314 dwellings in the New Forest. These are the two greatest contributors to the total PfSH shortfall of 12,896 and are both adjacent areas to TVBC. Thus, CN emphasise the importance for the Council to consider how it could deliver more homes to help meet the unmet need of these adjacent areas as they are required to do under the duty to cooperate.
- 3.51. CN consider that the land at Upton Lane is ideally located to provide a significant proportion of the required dwellings (c. 300) at a sustainable site needed not only to support the TVBC area but also the wider authorities within the PfSH, namely Southampton and the New Forest if required.

Housing Supply

- 3.52. Strategic Policy 6 sets out that Southern Test Valley (STV) has a minimum housing requirement of 4,653 dwellings over the plan period of 2020 to 2040 (43% of the total need). In Table 5.3, the housing requirement, total housing supply and residual requirement is broken down. The **residual requirement for STV is 948 homes**. It is noted in paragraph 5.22 that the total housing supply of 3,705 is based on how much existing housing supply the Council has committed as of 1 April 2021. This existing supply does not appear to be available for review as part of this consultation. In the most recent Annual Monitoring Report (AMR), published in December 2021, Appendix 7 is a housing trajectory for STV up to 2029 as at April 2020. Appendix 7 in the AMR shows existing commitments between 2020 and 2029 of 2,072 dwellings in STV and this includes 500 dwellings from the Whitenap, Romsey Local Plan allocation.
- 3.53. This results in 1,633 units that are understood to be delivered between 2029 and 2040 as existing commitments. Given that Whitenap will deliver up to 800 of those units, it is unclear where the remaining commitments totalling c. 800 homes will be delivered in STV. This should be supported by robust and credible evidence.
- 3.54. Paragraph 5.24 states that the existing housing supply delivers over 50% of the Council's housing requirement. CN question whether all of those existing commitments, particularly in STV will contribute such a high level of supply in the Plan Period where for example the Council are heavily reliant on the delivery of Whitenap which is not yet subject to a planning application. It is considered appropriate that once evidence is made available, the Council should interrogate this with reference to affordability of market housing relative to average income and the potential for concealed household formation based on affordability and market evidence. This analysis is considered fundamental due to the large reliance of STV on the development for its housing need.

- 3.55. TVBC outline at paragraph 5.25 that they are required to consider whether to allocate land to deliver more homes than the minimum required in order to provide greater resilience in their housing supply. CN consider that the Council must allocate for a higher number of homes above the Council's minimum housing requirement to take account of delays in sites coming forward or at a slower rate than anticipated for the local plan to be considered sound. It is considered that a non-implementation rate between the housing requirement and supply of a minimum 10% will provide greater resilience across the plan period. We consider that if TVBC continue to allocate fewer larger sites then the buffer would need to be increased due to greater risks of delays. Thus, the buffer will need careful and regular monitoring to ensure there is no under provision of housing which would worsen the supply position of TVBC.

Affordable Housing

- 3.56. The 2022 Test Valley Strategic Housing Market Assessment (SHMA) produced on behalf of the Council by JGC sets out that in 2020, the median house price in TVBC was 9.76 times the average earnings. This is similar to the South East and Hampshire affordability ratios but notably higher than the national average of 7.84. The affordability of TVBC has deteriorated over the past years worsening the situation and increasing the need for increased housing supply and for more affordable housing provision.
- 3.57. Housing stock is the most appropriate indicator of housing supply and housing need. Household projections are based on past delivery trends and do not have a relationship with future housing need. This is particularly the case where past delivery trends have not met housing need, resulting in suppressed household formation in younger age cohorts and an imbalance between housing supply and housing demand. In turn, this has influenced the increasing gap between average incomes and average house prices. Continued reliance upon them is to continue to plan for under-delivery. An adjustment for affordability reflecting the 10-year trend is an important indicator of change over time, which will demonstrate the long-term impacts of these suppressed household formation rates. The adjustment should aim to fully mitigate the previous under-delivery.
- 3.58. The Council note provision of affordable housing as a key priority to meet local needs, further paragraph 3.19 of the SHMA also notes the requirement in the PPG to consider whether the number of homes included in the local plan should be increased to better meet the need for affordable housing.
- 3.59. The affordable housing needs assessment set out within the SHMA demonstrates a need for both social and affordable rented and ownership across TVBC. The SHMA states a need of c. 437 affordable rented homes per annum and 215 affordable home ownerships per annum. It is noted that this need is shown in all parts of the Borough. Based on this, the Council states that the affordable housing need will be higher per annum than identified in the current Local Plan (Policy COM7 40% provision on sites of 15 or more dwellings), however do not identify a threshold for delivering affordable housing, due to the need of an updated viability evidence base.
- 3.60. The SHMA notes the main sources for assessing the current unmet need for affordable housing as follows: homeless households; households in overcrowded housing; concealed households; existing affordable housing tenants in need; and households from other tenures in need. It is considered that one of the greatest challenges is presented by concealed households / homeless households (of which there are 245

in STV) as these individuals do not currently occupy a dwelling. As set out in the SHMA it is vital that calculations of affordability provision take into account this portion of the population.

- 3.61. It is considered that the Council will need to carefully consider the threshold and percentage quantum of affordable housing and provide relative flexibility with the regard to overall requirement as well as the tenure mix. CN note that this flexibility is required due to the cumulative impact of all Local Plan policies on viability and other fixed costs relating to biodiversity net gain and electric vehicle charging points limiting the viability to provide a high percentage of affordable housing. Notwithstanding the above, CN are committed to providing a substantial portion of affordable housing on site due to their understanding of its importance and the quantum of local need.
- 3.62. CN note that the most effective method to increase the delivery of affordable housing is through the allocation of more larger housing sites due to increased viability prospects negating some of the constraints set out above.

4. Conclusion

- 4.1. This representations document responds to the TVBC Regulation 18 Stage 1 Consultation and promotes the land at Upton Lane on behalf of CN for residential-led development.
- 4.2. **Section 1** of the report provides an introduction and background to the history of the site. The site has been promoted over the last few years by CN and was submitted to the SHELAA titled 'Land at Upton Lane, Upton, Nursling' (ref: 385) where it was deemed to have capacity for up to 380 dwellings. The SHELAA classified the site as available, achievable and deliverable, and noted that development could commence in the next five years meaning the site has realistic prospect for implementation in the plan period.
- 4.3. In **Section 2**, the report provides an overview of the site and the concept masterplan. It is set out that the site is suitably located to provide a sustainable development which would significantly contribute to the housing need of STV:
- The site is highly self-contained visually and is located in a sustainable location, with established employment, education and retail areas in Nursling and Lordshill providing a realistic opportunity for a significant number of residents to meet their day-to-day needs by walking or cycling.
 - The site is adjacent to the existing settlement boundary of Nursling and Rownhams (Upton hamlet), a classified Tier 2 settlement under Policy SSP1 and is thus deemed a suitable location for development due to the presence of key facilities and infrastructure.
 - The site does not have any flood risk or drainage constraints and considerations that would restrict the site from being suitable for residential development of circa. 300 units.
 - The site is not considered to be subject to any overriding ecological constraints nor does the site contain any statutory environmental designations, and thus the proposed development of the site is considered to be readily deliverable in ecological terms. Further, there are significant opportunities to deliver strategic habitat creation and enhancements, and bring the site into active management to benefit biodiversity.
- 4.4. It is at **Section 3** that this representation document begins to explore the draft Test Valley Local Plan 2040 Regulation 18 Stage 1 consultation document. It is noted that CN are in agreement with the draft strategic policies presented in the document.
- 4.5. The primary concern raised by CN relates to the potential under provision of housing to meet both the needs of TVBC but also of PfSH. CN place emphasis particularly on the importance of delivery of the correct abundance of affordable dwellings to meet the needs set out the SHMA.

- 4.6. Thus, CN urge the importance that the updated standard methodology figure of 553 dwellings per annum in line with the updated affordability ratios is seen as an absolute minimum requirement and that the Council enforce a non-implementation buffer of 10% between the housing requirement and supply. We consider that by providing this buffer is vital due to the reliance on current commitments to provide housing which could be subject to non-implementation as it will allow for greater resilience across the plan period and for the plan to be deemed sound.
- 4.7. Ultimately due to the reasons set out above, we consider that the land at Upton Lane is the ideal location to help both TVBC, Southampton, the New Forest and the wider PfSH area meet their housing requirement.



Appendices



Appendix 1 Ecological Feasibility Appraisal, Aspect Ecology (February 2022)



Appendix 2 Landscape Opportunities and Constraints Map, Aspect Ecology (March 2022)



Appendix 3 Landscape & Visual Technical Note, Aspect Landscape Planning (March 2022)



Appendix 4
Flood Risk and Drainage Note, WSP (February 2022)



Appendix 5 Transport Report, RPS (February 2022)



Appendix 6
Vision Document, Crest Nicholson and Savills (March 2022)



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Director

Peter Warren
Associate

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