



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

By email to [REDACTED]

8 April 2022

Our reference: MLP21001

T: [REDACTED]
M: [REDACTED]
E: [REDACTED]

Dear Sirs

Test Valley Draft Local Plan 2040 Regulation 18 Stage 1

Master Land & Planning Ltd is instructed by Foreman Homes Limited (FHL) in respect of providing representations to the consultation on the Test Valley Draft Local Plan 2040 Regulation 18 Stage 1 and its supporting evidence. All references to the Local Plan 2040 are henceforth called the emerging Local Plan or 'eLP'.

Our client's interest relates to 'Land south of A342 and east of Shoddesden Lane' at Ludgershall. The 55 hectare greenfield site is identified in Appendix 8 of your SHELAA under Reference 324 with a capacity for 1500 dwellings. FHL have an interest in a wider landholding to deliver a sustainable urban extension to the south-east of Ludgershall within both Wiltshire Council and Test Valley Borough Council. The principles of this proposal were initially outlined within the 'Vision Document' submitted in October 2019. The proposals represent a logical extension to Ludgershall, providing an opportunity-led indicative masterplan delivering high quality development and new infrastructure. The emerging masterplan provides a unique opportunity to meet the long term development needs of both Wiltshire and Test Valley Borough Council in a strategically sustainable location through a high quality, sensitive development involving local communities and delivering much needed and desired infrastructure improvements.

FHL welcomes the opportunity to share views on the issues and opportunities associated with eLP which will help to shape future growth in the area over the plan-period to 2040 and beyond. Please find enclosed:

- Completed consultation form; and
- Representations ordered by questions within the eLP Consultation with references to the appropriate paragraphs, topic papers and supporting evidence.

Please can the Representor be notified of future consultations relating to the eLP.

Yours faithfully

[REDACTED]

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Paragraph Reference	Draft Policy Reference	SA Reference
1.36 and 1.37		
Representations		
<p data-bbox="204 371 355 405"><u>Plan Period</u></p> <p data-bbox="204 443 1390 524">The start of the Plan period should be 2021 and is therefore consistent with the 5-year anniversary of the current Local Plan.</p> <p data-bbox="204 562 1390 642">An end of the eLP plan period beyond 2036 is supported, however at this stage a plan period to 2040 is not supported.</p> <p data-bbox="204 680 1390 976">The latest LDS scheduled adoption of the eLP in Q3 2025. A period of 12-months for the submission and Examination of the eLP is a tight schedule. Even if the Q3 2025 date was achieved, the adopted plan would have a period of just less than 15 years, contrary to paragraph 22 of the NPPF. For these reasons alone, the plan period should look forward to 2042 to provide greater flexibility given the likely delays to the Examination, including consultation on modifications.</p> <p data-bbox="204 1014 1390 1310">Paragraph 22 also confirms policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery for larger-scale developments such as new settlements or significant extensions to existing villages and towns. In the absence of the Reg.18 Part 2 that will define the draft site allocations, it is not possible to confirm whether the delivery of the vision will rely upon a period greater than to 2040; meaning a longer plan period is required.</p>		

Paragraph Reference	Draft Policy Reference	SA Reference
2.16 to 2.20		
Representations		
<p data-bbox="204 371 772 405"><u>Regional Context and the Duty to Cooperate</u></p> <p data-bbox="204 443 1390 734">The duty to cooperate (DtC) relates to the preparation of the plan it cannot be rectified post-submission, so if the Inspector finds that the duty has not been complied with they will recommend that the local plan is not adopted and the examination will not proceed any further. All eLP consultations should be supported by a live document (separate from the Statement of Consultation) outlining how the LPA are engaging with relevant bodies as such cooperation is material to the vision, strategy and policies within the eLP.</p> <p data-bbox="204 772 1390 857">FHL raise concerns regarding the DtC in respect of known unmet needs from other authorities, see representations to 5.8 to 5.14.</p> <p data-bbox="204 896 1390 1081">Relevant to our client’s interests is your cooperation with Wiltshire Council. This is especially important given Wiltshire Council’s representations to the eLP Refined Issues and Options Consultation – as summarised in the Statement of Consultation Appendix 2 under respondent number 10202.</p> <p data-bbox="204 1120 1390 1574">The Swindon and Wiltshire SHMA - Identifying Housing Market Areas (June 2017) document identifies an Andover HMA which extends into Wiltshire and specifically the town of Ludgershall. The report noted that <i>“the Andover functional housing market area covers 3.5% of Wiltshire’s population and is the only functional HMA surrounding Swindon and Wiltshire which covers more than 1.0% of Wiltshire by population. Of a total population of 84,900 in the Andover functional HMA, 16,200 live in Wiltshire (19.1% of the population of the HMA)”</i>. The Ludgershall / Tidworth Market Town represents the secondary settlement in population and scale within the functional HMA. Finally, the report suggested areas for joint working, including with Test Valley regarding Ludgershall.</p> <p data-bbox="204 1612 1390 1906">The recently published Test Valley Housing Markets Report (HMR) dated January 2022 reaffirms the strong linkages between the north of the Borough and the Tidworth / Ludgershall area in Wiltshire in respect of migration and commuting patterns. Paragraph 7.6 of the HMR concludes <i>“The northern parts of the Borough including Andover are linked to a number of neighbouring areas but principally Wiltshire and more specifically Salisbury and Ludgershall, particularly in migration terms. However, it also acts as an employment centre in</i></p>		

its own right so can be viewed as its own HMA but dialogue with neighbouring authorities should continue."

The strong functional relationship that Tidworth / Ludgershall have with settlements in northern Test Valley in terms of employment, retail and wider services are crucial cross-boundary effects. The delivery of housing need across this functional area with transport and associated infrastructure are imperative issues to your eLP and the Wiltshire Local Plan Review. Notwithstanding the absence of an unmet need from Wiltshire Council to be accommodated in Test Valley, we wish to support the previous representations of Wiltshire Council and promote the importance of a specific cross-boundary vision through the DtC; meaning sufficient land is released to meet local needs in both Wiltshire and Test Valley. This strategy should have regard to:

- The wider spatial and demographic links as part of the functional Andover HMA;
- The dual role of the Tidworth / Ludgershall Market Town as a sustainable growth point straddling the authorities to meet needs associated with cross-boundary working recognising the functional common interests;
- Capabilities to deliver improvements to transport infrastructure associated with the A342 corridor to improve quality of life and environment of Ludgershall while supporting sustainable commuting patterns between the Market Town and Andover.

Figure 2.1

The inclusion of the following cross-boundary influences on the neighbouring authorities plan would aid the geographical context beyond purely administrative boundaries, thereby showing factors shaping your DtC:

- Key influencing settlements outside of Test Valley.
- Major and Main Roads.
- Railways.
- Rivers.
- River catchments (nutrient impact)
- Designations (AONB, New Forest National Park, etc).

Paragraph Reference	Draft Policy Reference	SA Reference
2.21		
Representations		
<p data-bbox="204 371 288 405"><u>Vision</u></p> <p data-bbox="204 443 1390 629">A distinctive vision that is aspirational and realistic is supported, however there are benefits in explicitly recognising the geographical and functional context of the Borough, thereby ensuring the vision is in response to the DtC. A recommended amended vision is below with changes underlined.</p> <p data-bbox="204 667 1214 701"><i>By 2040, Test Valley Borough’s communities will be prosperous and resilient by:</i></p> <p data-bbox="204 734 1390 1032"><i>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 <u>at</u> sustainable locations and support the delivery of infrastructure.</i></p> <p data-bbox="204 1066 1390 1256"><i>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.</i></p> <p data-bbox="204 1290 1390 1480"><i>The Borough will continue to be known for its varied, green and distinctive landscapes, heritage and rich ecology, <u>and the North Wessex Downs AONB, the International Nature Conservation sites and nationally protected habitats in the Solent and New Forest area which will have been safeguarded.</u></i></p> <p data-bbox="204 1514 1390 1917"><i>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.</i></p>		

Paragraph Reference	Draft Policy Reference	SA Reference
3.1 to 3.15		Section 7

Representations

Sustainable Spatial Strategy

The previous representations concerning the DtC summarise the significant cross-border relationship with Wiltshire Council concerning the functional Andover HMA given the Market Town of Tidworth / Ludgershall is the second largest settlement. This relationship and mutual interest is not acknowledged within the supporting Sustainability Appraisal despite the HMR confirming this strong linkage.

Late 20th century development has largely occurred incrementally at Ludgershall to the south of the railway line of Astor Crescent and Empress Way, as summarised in figure 1 below.

1980s - The North Tidworth and Ludgershall Local Plan allocates land south of the railway line for housing and industrial development. The allocation establishes the principle for a distributor road leading to a secondary access to Andover Road A342 to the east.

1989 - Outline planning permission K/13965 secured for residential development and formation of Empress Way to distributor road standard. The Princess Mary Gardens development of 150 homes is constructed in the late 1990s.

2015 - Outline planning permission E/2013/0234/OUT granted for 109 dwellings immediately to the east of the Princess Mary Gardens development.

2019 - Reserved matters approval 18/04346/REM is granted for 80 dwellings. Construction is commenced by Foreman Homes in 2020 and is nearing completion.

2020 - Wiltshire Housing Sites Allocations Plan DPD allocates 16.5 hectares of land for a mixed use allocation H1.1 for 270 dwellings and land reserved for a 2FE primary school. Foreman Homes submit Full Planning Application 20/06554/FUL for residual of 190 homes. Empress Way is extended further to the east.

The construction of Empress Way from the junction with the A3026 at Tidworth Road was built to a distributor road standard owing to the opportunity to extend eastwards to the A342. Consequently, Ludgershall has incrementally grown increasingly eastwards over time in recognition of its sustainability, availability of suitable land to the south of the railway line and the long-term, objective to deliver the strategic infrastructure.

Continued sustainable growth at Ludgershall within 'land south of Ludgershall' (Wiltshire SHLAA reference 555 – at **Appendix A**) is becoming constrained by its location abutting the administrative boundary, as defined to the east by Shoddesden Lane. FHL consider now is the right time to plan holistically to meet the needs of Test Valley Borough Council and Wiltshire Council over the long-term instead of continued incremental growth that has served us well to date, but has yet to deliver the locally desired infrastructure improvements.

While historically it has not been proposed that part of Wiltshire's housing need be met on land to the east of Shoddesden Lane within Test Valley, the delivery of the vision for Ludgershall – most recently outlined within the South Park Garden Village Vision Document dated December 2017 – is reliant upon key infrastructure within Test Valley, including the Empress Way to A342 connector road. The continuation of Empress Way to the south-east of the town connector road is identified in the Wiltshire Local Plan Review Consultation January 2021 as one of six place shaping priorities to guide development and the direction of growth (see page 5 priority iv of the 'Planning for Tidworth and Ludgershall' document – enclosed at **Appendix B**. Wiltshire SHLAA Site 555 is reference as 'Site 4 Land at Empress Way in this aforementioned consultation.

The vision for Ludgershall also will facilitate an opportunity for growth within Test Valley on your SHLAA Site Reference 324 that will be developable within the eLP plan-period to 2040 and has a key role in contributing to the infrastructure. This land is available and in the sole control of FHL to meet the needs of the functional HMA and therefore can contribute towards the housing requirements of Test Valley Borough Council, or Wiltshire Council (through appropriate provisions).

To have two parcels of land (TVBC reference 324 and WC reference 555) available for development on suitable land at a sustainable location, under control by a single developer, is very unique and demonstrates the land is developable and deliverable in the context of the NPPF.

The proposed eLP spatial strategy (and the reasonable alternatives in the SA) does not recognise the geographical influences of settlements outside of Test Valley as sustainable

locations. It therefore may hinder the delivery of the proposed strategy and level of growth for Ludgershall should Wiltshire Council require higher levels of growth as the most appropriate strategy now, in a review of their Local Plan Review before 2040. Your eLP should include an acknowledgement of the opportunity for growth and infrastructure improvements at Ludgershall and, if land to the south-east of Ludgershall is required as a potential option for growth, appropriate consultation will be undertaken and if necessary the two authorities can pursue a single issue Joint Site Allocations DPD for the area.

Paragraph Reference	Draft Policy Reference	SA Reference
3.19 to 3.35	Spatial Strategy Policy 1	SA Section 8 Settlement Hierarchy Topic Paper
Representations		
<p>In relation to our client’s interest at SHELAA Site 324, this land would be designated as ‘countryside’. This is inconsistent with paragraphs 3.29 and 3.32 as Ludgershall (defined as a Market Town in the Wiltshire Core Strategy) is equivalent to your Tier 1 and Tier 2 settlements in respect of services and public transport accessibility – using the definitions within your accompanying Settlement Hierarchy Topic Paper.</p> <p>Ludgershall benefits for all six ‘key facilities’ defined in bold in Table 9 of the Settlement Hierarchy Paper used to assess the sustainability of settlements. In addition, Ludgershall has other food, education, health, recreation and community facilities needed to meet the day-to-day needs of residents. A good level of public transport by high-frequency bus services is available on the route between Andover – Tidworth – Salisbury, meeting the expectations of Table 10.</p> <p>While it is recognised that Ludgershall is within Wiltshire Council, as explained in representations to the Sustainable Spatial Strategy, the eLP should establish a positive framework that properly recognises the role of Ludgershall / Tidworth within the wider functional Andover HMA as a demonstrably sustainable focus to locate growth. This will enable land to be brought forward within the Test Valley administrative area to facilitate beneficial housing growth and infrastructure.</p>		

Paragraph Reference	Draft Policy Reference	SA Reference
4.134		
Representations		
<p>The continuation of Empress Way to the south-east of the town connector road is identified by Wiltshire Council and the local community as one of six place shaping priorities to guide development and the direction of growth (see page 5 of the 'Planning for Tidworth and Ludgershall' document supporting the Local Plan Review). The strategic proposal relies upon land within the Test Valley plan area to facilitate:</p> <ul style="list-style-type: none"> • The construction of a new roundabout onto the A342 Andover Road, rail overbridge, link road between A342 and Empress Way; • A 2m footway will run the full length of the link road connection between Empress Way to the west and A342 Andover Road to the east; • 1m verge both to the north and south of the road; • Associated infrastructure. <p>Our client welcomes the opportunity to present further details of these proposals to Test Valley Borough Council and Wiltshire Council on this matter to protect this project, site and route which is critical infrastructure to:</p> <ul style="list-style-type: none"> • Widen transport choice and facilitate bus route creation for the south of Ludgershall; • Help relieve congestion at the Ludgershall War Memorial Junction; • Improve connectivity by foot and cycle by extending the shared route beside the A342 between Andover and Ludgershall, which currently extends to Weyhill. • Help to unlock housing and economic opportunities to the south-east of Ludgershall within both Test Valley and Wiltshire. 		

Paragraph Reference	Draft Policy Reference	SA Reference
5.8 to 5.14	Strategic Policy 6	

Representations

The eLP sets out your local housing need assessment, and this concludes using the standard method that your minimum local housing need figure is currently 541 dwellings per annum (dpa) from 2020 onwards, which would apply until the end of the plan period, a total of 10,820. The eLP proposes no exceptional circumstances to depart from the standard method in establishing the minimum level of need. Strategic Policy 6 then takes forward the minimum local housing need as your minimum requirement, with disaggregation to two best-fit housing market areas. Table 5.3 summarises a residual requirement of 4,453 dwellings to be identified by the eLP.

Given the early stage of the eLP and variables affecting the local housing need calculation using the standard method, the figure is subject to change as part of the plan-making process.

The latest annual data was published 23rd March 2022 on house prices and annual earnings to calculate affordability ratios for national and subnational geographies in England and Wales. The 2021 ratio of median house price to median gross annual workplace-based earnings in Test Valley has increased from 9.76 to 10.60. An updated calculation of the minimum local housing need using a 2022 base-date is summarised below.

Step 1 Household growth (per annum) over the next 10 years, 2022-2032	392
Median workplace-based affordability ratio, 2021	10.60
Adjustment factor	141%
Step 2 Step 2 Housing Need Figure	553
Step 3 Cap @ 40% above Last Adopted Plan of 588 dpa	823
<u>Minimum Local Housing Need (per annum)</u>	<u>553</u>

The quantum of 541 dpa (specified in the eLP consultation) and the revised 2022-based figure of 553 dpa is a reduction in the housing required by the current Local Plan of 588 dpa.

The SHMA dated January 2022 at paragraph 18 summarises that there are no circumstances which indicate that actual housing need is higher than the standard method indicates.

In terms of whether there are unmet needs from other authorities, eLP Paragraph 5.12 states *“At present there is no evidence of any unmet housing need in neighbouring local authority areas; this will need to be kept under review.”* This is incorrect and FHL would draw the Council’s attention to the Statement of Common Ground between Fareham Borough Council and the Partnership for South Hampshire dated October 2021 (**Appendix C**) where paragraph 4.6 states:

“It is understood from the work on the revised PfSH Statement of Common Ground that, based on standardised plan periods of 2021-2036, there is a predicted shortfall in the region of some 13,000 homes across the sub-region. This figure is derived from eleven authorities who are all at different stages of plan preparation and is set out in the PfSH Statement of Common Ground. The housing need estimated for Southampton includes the 35% uplift in need that the Government has applied to the 20 largest cities in England and this element alone equates to 5,400 dwellings between 2021 and 2036.”

The above led to an agreed position at paragraph 4.9 summarising there is ongoing work in relation to housing need and supply and that the level of unmet need will alter as other Local Plans progress. There is no such recognition within the eLP consultation.

FHL object to a reduction in the housing requirement of the Borough and ask for reconsideration that has regard to the following.

The PPG at 2a-010-20201216 confirms the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates, with three (not exclusive) reasons given.

The PPG at 2a-024-20190220 also states an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.

While the underlying guidance has changed since the Examination of the current Local Plan, the Inspector Mr Ware was clear at paragraph 41 of his report that *“...the approach of the RLP is not exclusively based on population data, as it also factors in employment issues,*

suppression in household formation and market signals.” These principles of sustainable growth remain relevant today as they were in 2016.

- Between 2011 and 2020, there were 7,071 net dwelling completions in Test Valley (at an average of 786 per annum). Figure 2.10 shows a range from 525 dwellings (2011/12), up to 1,004 (in 2015/16). These market signals demonstrate a strongly performing construction sector over a sustained period that remains capable of delivering well in-excess of the minimum 541 dpa proposed by the eLP and the 2022-based figure of 553 dpa.
- In 2020, the median house price in Test Valley was 9.76 times average earnings (similar to the South East and Hampshire). The SHMA at 2.42 confirms that affordability has deteriorated slightly over the past few years but at a lesser rate than seen regionally – with a 1.15 point change over 15 years in Test Valley compared to 1.65 in Hampshire. The strong rates of delivery over this period will have been a contributing factor in a weaker comparative deterioration in affordability in the Borough.
- The annual target for affordable housing is 200 homes (gross) per annum, which was below the needs identified in the 2013 SHMA. This target has been exceeded in all monitoring years from 2014/15. The total 1,849 gross affordable housing completions since 2014/15 (an average of 264 per year) equates to 30% delivery against a net housing growth of 6,204 dwellings. This is below the assumption in the 2013 SHMA evidence is that 35% of housing completions would be affordable given viability conditions. The higher than envisaged housing completions has assisted to offset for this reduction in percentage terms. A higher than envisaged annual rate of affordable housing of 264 dpa compared to 206 dpa (as expected by the current Local Plan) is therefore achievable.
- Today between 995 and 1768 households remain in unsuitable housing and are likely to have insufficient income to afford market housing. Figure 5.17 of the SHMA provides analysis showing a higher net affordable need in this assessment compared with previous 2013 SHMA – a need for 437 dwellings per annum (8740 over the 20-year period), compared with 292. There is no current test of the viability of provision, but using the 35% figure taken forwards from the current Local Plan around 1250 dpa is required. It is accepted such a figure would not be realistic, however SHMA Figure

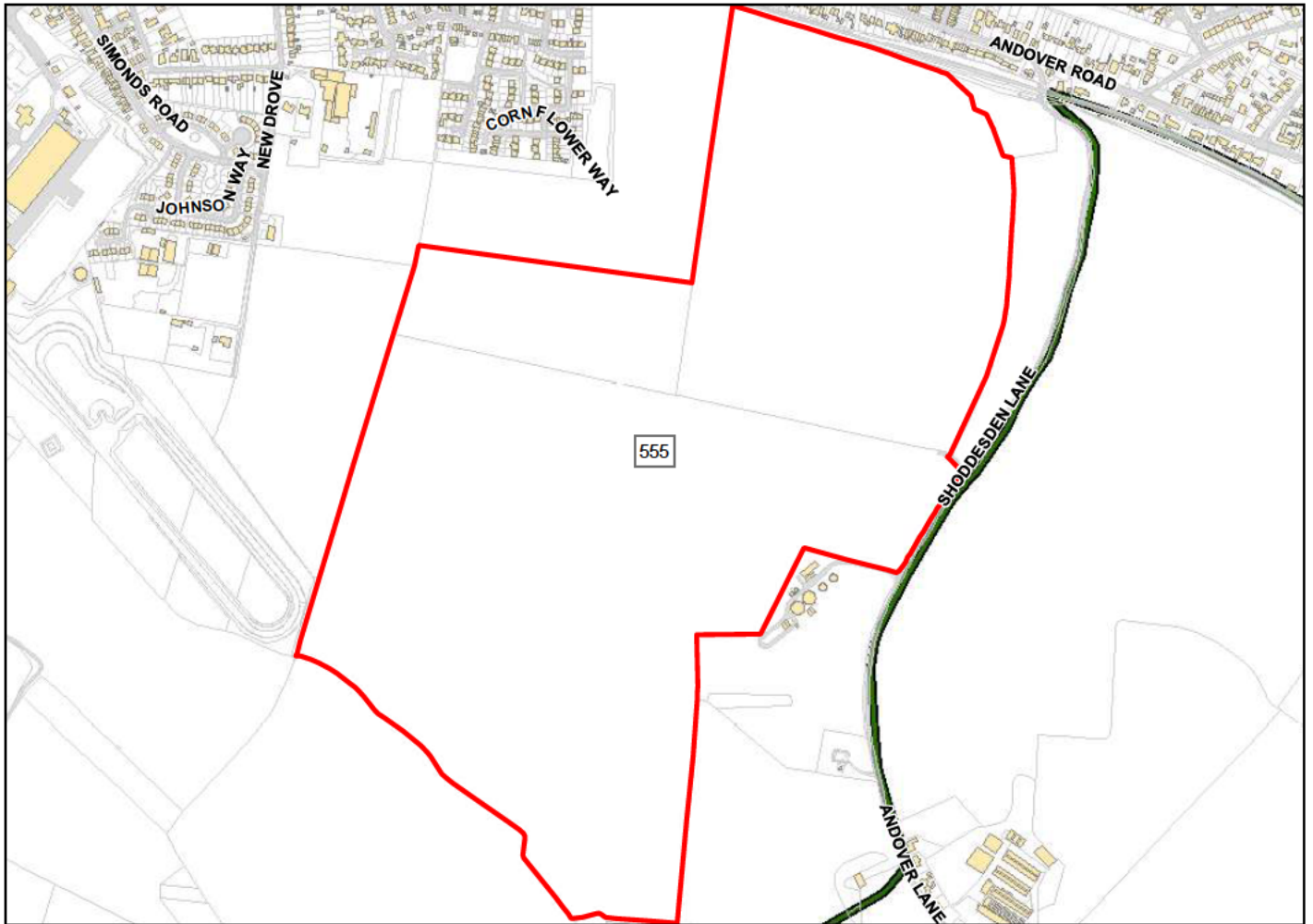
2.10 does highlight the capacity of the market to deliver between 800 to 1000 dpa, which in-turn drives higher affordable housing completions by quantum.

The SHMA at 5.61 confirms there is a '*substantial need for additional affordable housing*' and this has grown since the 2013 SHMA. The eLP needs to reflect market signals and affordable need and actively support a substantial increase in the housing requirement to enable delivery compared with that needed to meet the minimum local housing need. Only through planning to exceed this minimum can the eLP through the application of its policies result in a similar substantial increase in the delivery of affordable housing.

The great risk of reducing targets below those within the current Local Plan (which have been exceeded) is that the pace of delivery will bear no resemblance to what can be enshrined as prepared positively, in accordance with the DtC, in a way that is aspirational but deliverable given higher growth is not only possible, but beneficial.

Modifications to the eLP to recognise and support the growth potential of Ludgershall within the Test Valley administrative area will unlock important developable land within your plan period. FHL welcome opportunities to work with the Borough on their deliverable proposals so that the land south-east of Ludgershall can contribute towards boosting supply beyond that identified by the standard method as a minimum to be delivered.

Appendix A



Site Address: Land at Empress Way

Total Area: 69.1321ha HMA: East Wiltshire

Suitable Area: 69.1321ha (100.0%) Previous Use: Greenfield

Suitability Constraints*: N/A

All Constraints*: SPA_5km, SAC_5km, ALCG1

Suitable: Yes. No suitability constraints. Available: Yes

Achievable: Yes (Residential) Deliverable: Yes

Capacity: 2234 Developable: In short-term

*Note: Constraint abbreviations can be found in the SHELAA Methodology Report in Appendices 1 and 2 on pages 14 and 16.

Appendix B

January 2021



Tidworth and
Ludgershall

Wiltshire Council LOCAL PLAN

Looking to the future

Planning for Tidworth
and Ludgershall



Wiltshire Council

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Introduction

1. What will Tidworth and Ludgershall be like in the future?
 - How much should the towns grow?
 - What priorities should we tackle?
 - Where should development take place?
2. Answers to these fundamental questions affect how the town develops over the next 15 years.
3. The Council is thinking about these questions in planning Wiltshire's future. It's an important stage in the Council's review of the current Wiltshire Core Strategy and the development of the Local Plan.
4. The Wiltshire Core Strategy is the basis for determining most planning applications. It also identifies land for development that provides for new homes, jobs and infrastructure for our growing communities whilst balancing the need to protect the environment. The Local Plan will continue this role and therefore help shape the places the community of Wiltshire live and work within.
5. The Council has come to some initial answers to these three questions. It is sharing them and wants your views.

Scale of growth

How much should the town grow?

6. The Council assesses what amount of new homes are needed between 2016 and 2036, the period of the Local Plan. It does the same for how much land will be needed for new jobs and business. Detail on these requirements can be found in the 'Emerging Spatial Strategy' paper.

Additional homes

7. Assessments estimate levels of need for new homes within housing market areas, as these reflect where the majority of the local population live and work, where the majority of home moves take place and where there is a common range of private sector rents. There are four housing market areas in Wiltshire and each area includes many settlements. Tidworth and Ludgershall is in the Salisbury Housing Market Area.
8. The Council has considered how best to accommodate needs for new homes, setting scales of growth by testing different distributions. The result of this work suggests the scale of growth should change from what is currently planned as shown on the right.



Additional new homes
0 200 400 600 800 1000 1200 1400 1600 1800 2000

9. The current strategy 2006-2026, the Wiltshire Core Strategy, identified a requirement for 1,750 homes. The new strategy proposes a requirement of 1,555 homes for the plan period 2016-2036.

10. From this total estimate of need over the plan period can be deducted homes already built and those already in the pipeline as shown in the diagram below .

Homes already built (2016-2019) Homes already in the pipeline Homes to be planned for



Additional new homes
0 200 400 600 800 1000 1200 1400 1600 1800

¹In Tidworth and Ludgershall 510 dwellings have been built between 2016-2019 and, at 1 April 2019, 889 homes are in the pipeline (i.e. they have planning permission, resolution to grant planning permission or are allocated in the Wiltshire Housing Site Allocations Plan).

11. When the number of homes built and in the pipeline is deducted it leaves a further 165 homes to be accommodated up until 2036. Both the Local Plan and neighbourhood plan can allocate sites for development. Each community is encouraged to help determine where development takes place though the preparation of a neighbourhood plan. The Local Plan will only allocate land where necessary to ensure supply of deliverable land to meet strategic housing needs and for large or complex sites.
12. The Local Plan will identify sites on which new homes can be built. The starting point for determining sites for allocation within the Local Plan has been to identify a pool of potential development sites. The most appropriate locations to meet the emerging scale of growth for the towns will be selected.
13. There are currently no 'made' neighbourhood plans for the area. In the case that one comes forward in the plan period at either of the towns it would be able to propose development on sites, e.g. to meet a need for a particular housing type, such as self-build homes or that positively plan for brownfield sites.
14. Needs for development land should be met as far as possible on brownfield sites in order to help minimise the loss of greenfield land. The Council suggests that a target of 40 homes should be built on brownfield sites over the next 10 years². This would be in addition to the delivery of the Drummond Park site at Ludgershall for 475 homes, which has planning permission.
15. The Local Plan ensures that the proposed scale of growth will be accommodated. It must be certain that there is a land supply sufficient to meet assessed need. It cannot rely on the brownfield target being met by as yet unidentified windfall redevelopment, the scale or timing of which is uncertain.
16. Meeting a brownfield target will instead reduce the need for greenfield sites in future reviews of the Local Plan. This could be a focus for a neighbourhood plan were one to be prepared. Sites identified formally, with sufficient certainty, either in the development plan or by granting planning permission, reduce the need.
17. Alongside neighbourhood plans, development briefs for individual sites and master plans for larger areas, are a means for the community, with developers and landowners, to help bring forward brownfield opportunities and achieve appropriate designs.

The Local Economy

18. The Council has assessed what additional land is needed for business in each of the economic zones of the County. These zones encompass many settlements. It has considered how best to accommodate needs for new business by testing different distributions³.
19. On current evidence, a further 5ha of employment land is needed at Tidworth and Ludgershall in the period to 2036. 12ha of employment land is also allocated at Castledown Business Park in the existing Wiltshire Core Strategy. Of the 12ha allocation, only approximately 2ha of the site has been built out.

Questions

TL1. What do you think to this scale of growth? Should there be a brownfield target? Should it be higher or lower?

TL2. Do you agree that the strategy should look to allocate more employment land?

TL3. How could the delivery of employment on the Castledown Business Park be facilitated?

²Further detail can be found in the Emerging Spatial Strategy (2021) paper.

Place shaping priorities

What priorities should we tackle?

20. The Local Plan will contain a set of place shaping priorities for each main settlement. They play a central role in developing planning policies and proposals for development. They will be the basis for an overarching planning policy for Tidworth and Ludgershall that will guide development and the direction of growth.

21. Some priorities apply equally everywhere, notably the need to address climate change and achieve carbon reduction. Place shaping priorities are intended to be those distinct to a particular place. They may include:

- Important local objectives or issues and how they can be addressed
- Opportunities that have been identified that can help support a local community's vision
- Infrastructure requirements for which there are local aspirations and capable of delivery or that are necessary to support likely future growth

22. They must relate to the development and use of land and so should revolve around specific outcomes and their benefits

23. They are also a starting point for policies that can be in neighbourhood plans. The Council will continue to work with Town and Parish Councils to find the priorities best suited to delivering sustainable development and town centre improvements. At this stage of the plan making process, these are the draft priorities that have been identified for Tidworth and Ludgershall.

- i. Plan for a level of housing growth to meet local needs, including that from those leaving military accommodation and moving into civilian housing.
- ii. Respond to market needs in diversifying the employment offer across the two towns, including facilitating the delivery of Castledown Principal Employment Area and provision for small and medium business enterprises.

Tidworth

- iii. Promote and encourage regeneration of Tidworth Town Centre (Station Road).

Ludgershall

- iv. Support local road improvements to ensure any growth is suitably integrated into the local transport network. Including support for the continuation of Empress Way to the south-east of the town.
- v. Encourage the balancing of commercial leisure uses and community facilities to support housing delivery at Ludgershall.
- vi. Explore long-term opportunities to open the MOD railhead as a commercial line to Andover and the east.

Questions



TL4. Are these the right priorities? What priorities may be missing? How might these place shaping priorities be achieved?

Potential Development Sites

Where should development take place?

24. Land around Tidworth and Ludgershall is being promoted for development by landowners or prospective developers. From this larger amount of land, the Council is focussing its own assessment on a smaller pool of potential development sites that are shown on the map below. How these sites have been chosen is explained in a separate 'site selection report', published alongside this document. Not all these sites will be needed to meet the housing requirement in Tidworth and Ludgershall, further assessment will be carried out following the consultation to identify which site(s) will be proposed for allocation in the draft plan.
25. The Local Plan ensures the proposed scale of growth will be accommodated. The amount to be planned for takes account of development that is already certain and in the pipeline, including as many brownfield sites as can be relied on, such as those with planning permission.
26. But, if Tidworth and Ludgershall is to expand, the next difficult question focuses on where and how the built-up area may need to extend to accommodate change. Therefore, what will the role be for the release of greenfield land at Tidworth and Ludgershall and where is it most appropriate to consider development options.
27. Each potential development site has its own individual characteristics. Rarely is one site very clearly the best choice. There are a range of different constraints and opportunities associated with each. Some are common to several or even all potential development sites.

The information below shows what features, possibly both good and bad, set each one apart from others under consideration using current evidence. This pool of sites can be used to allocate sites in the Local Plan. One or more sites in whole or part will be selected and the rest of the pool of the potential development sites will remain as they are – i.e. potentially available for consideration in any subsequent plan review. The results of this consultation might remove some sites, might restore others that were rejected or might even throw up new ones that have not so far been considered.

28. Only a small amount of land is required at Tidworth and Ludgershall in meeting strategic housing requirements. There is potential for a joint neighbourhood plan or neighbourhood plans for the respective towns to be prepared that would be able to consider further sites for the development of homes, businesses or other uses to meet local needs. Alternatively, the Council could look to identify new sites to ensure that strategic needs can be met. The pool of sites here is a starting point for the assessment of additional greenfield sites at both settlements. The urban area of Ludgershall to its east is adjacent to the adjoining local authority area of Test Valley, where there are sites that have been put forward with potential for development. These have not been included given the relatively small amount of land that is required, and the pool of sites identified which are better related to the town.

Questions

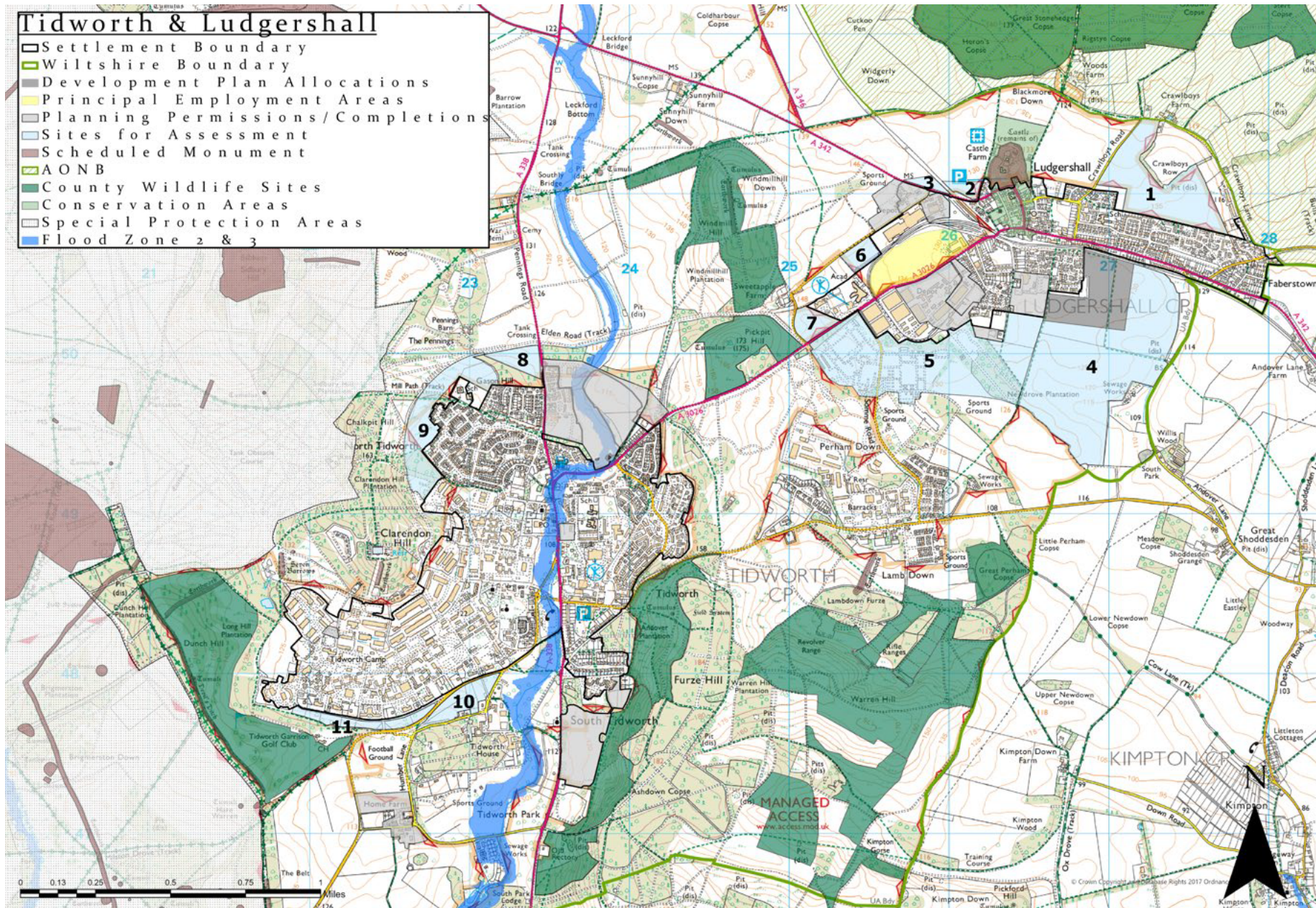
TL5. Is this the right pool of potential development sites?
Are there any other sites we should be considering?

TL6. What land do you think is the most appropriate upon which to build?
What type and form of development should be brought forward at the town?

TL7. Are there important social, economic or environmental factors you think we've missed that need to be considered, generally or in respect of individual site?



Figure 1 Map showing potential development sites for assessment



Eleven sites have been identified for Tidworth and Ludgershall for further assessment of their development potential. Not all of these sites will be allocated for development. Given the relatively small amount of land that needs to be planned for at Tidworth and Ludgershall, not all of any particular site may be required at this time, but it would be sensible to consider the area as a whole when decision-making. Key considerations for the individual sites are set out below.

Considerations that are relevant for all or a number of the sites:

- Contributions would be required to expand existing school provision, including early years, and ensure safe walking routes.
- All sites will require groundwater investigations in relation to potential flood risk.
- Sites 1-7 will need detailed consideration of the control of surface water discharges from new development.
- Most sites will require a suitable assessment of land required to uncover any apparent contamination.

Site 1: Land East of Crawlboys Road (SHELAA site 3498)

- The site is particularly sensitive in landscape terms and has a limited to medium capacity to accommodate a housing development. Development at the site would need to limit encroachment on the North Wessex Downs Area of Outstanding Natural Beauty, including limiting development on the slopes towards the north of the site and retaining hedgerows and woodland.
- Careful consideration of potential impacts on the setting of Grade II Listed Crawlboys Farm, the setting of the scheduled ringworks and castle and other farm buildings in the north of the site is required.

Site 2: Land North of A342 (SHELAA site 3468)

- Ludgershall Castle Scheduled Monument and the medieval town of Ludgershall are within 100m of the site. Further archaeological assessment is required.
- The scheduled castle and ringworks have an important defensive position on the edge of the town. Account needs to be taken of any

impact development will cause to the setting of these and the conservation area.

- Significant habitat buffer to dismantled railway would be required.
- The site has strong boundaries and as such, the landscape has a medium sensitivity.

Site 3: Land North-east of A342 (SHELAA site 2067)

- The scheduled castle and ringworks have an important defensive position on the edge of the town. Account needs to be taken of any impact development will cause to the setting of these and the conservation area.
- Significant habitat buffer required to dismantled railway.
- Windmill Hill is a prominent hill to the west of the site, which has a very rural character with very distinctive boundaries. The landscape has a medium sensitivity.

Site 4: Land at Empress Way (SHELAA site 555)

- The site is a large parcel of land that has a strong rural character, contributing to the separation of Ludgershall and outlying rural settlements. As such, it has a medium landscape sensitivity and medium capacity to accommodate housing development. Development must avoid a large-scale urban extension in a sensitive area, which creates a hard settlement edge.
- Nearby sewage works suggests a high potential for odour impacts. The extent of development should be limited, and the layout carefully planned.

Site 5: South-west Ludgershall (SHELAA sites 2064, 2065, 2066)

- High value habitat across the site, including land secured for mitigation of approved army basing development. Thus, significant mitigation is required.

Site 6: Land North of Wellington Academy (SHELAA site 2062)

- Highly sensitive historic landscape within the site and wider network of weak continuity due to change in the landscape. More investigation is required.

Site 7: Land North of A3026 (SHELAA site 2063)

- Site forms lower slopes of Pickpit Hill, which rises to a low hill to the southwest of the site and as such, the site has medium landscape sensitivity.
- Groundwater levels could impact infiltration techniques and groundwater investigations will be required.

Site 8: Land West of Pennings Road (SHELAA site 3110)

- Account needs to be taken of the potential impact of development on scheduled Sidbury Hill.
- Forms part of the distinctive Plains landscape that encompasses the north and west of Tidworth. Distinct from the settlement itself, the landscape is valued in landscape terms and therefore subject to medium to high landscape sensitivity.

Site 9: North-west Tidworth (SHELAA site 3111)

- Number of archaeological assets onsite and in close proximity. Although risk to the majority of these remains low, the site is considered to be constrained by archaeological remains.
- Highly sensitive landscape character. Likely that further investigation is required to understand full historic landscape significance on the downland forming most of the site.
- Development in the north of the site may need to be avoided in order to preserve the historic landscape.
- The site is unlikely to be able to support a new school to meet education needs, but an existing school expansion is possible for a development of up to 350 homes.
- Account needs to be taken of the potential impact of development on scheduled Sidbury Hill.
- Forms part of the distinctive Plains landscape that encompasses the north and west of Tidworth. Distinct from the settlement itself, the landscape is valued in landscape terms and therefore subject to medium to high landscape sensitivity.

Site 10: Land South of Bulford Road (SHELAA site 3037)

- Highly sensitive historic landscape within the site. Development poses a high risk of significant adverse effects towards Tidworth Park Ornamental Parkland, which has a strong and well retained character.
- Account needs to be taken of the potential impact of development on Grade II Listed Jellalabad barracks and historic barracks as a whole.
- High value habitat across whole of site. Significant mitigation required.
- Forms part of a locally identifiable landscape, forming part of the parkland setting to Tedworth House and landscape character of Tidworth Camp. As such, it has medium landscape sensitivity.

Site 11: Land South of The Mall (SHELAA site 3036)

- The site forms part of the parkland landscape surrounding the south of Tidworth and Tidworth Camp and forms part of a legible settlement edge. As such, the site has a medium landscape sensitivity and medium capacity to accommodate housing development.
- Account needs to be taken of the potential impact of development on Grade II Listed Jellalabad barracks and historic barracks as a whole.
- High value habitat across whole of site. Significant mitigation is likely to be required.

Settlement profiles

When planning for growth it is important to consider the characteristics of the town in terms of important services and infrastructure (green infrastructure, health, education, transport and utilities), as well as housing need and the local economy. The following profiles therefore summarise measures in place or being put in place to address known infrastructure issues and their timing, what additional provision would be needed to support growth and what other opportunities there may be.

Questions



TL8. Are there any other issues or infrastructure requirements that should be identified?

Topic	Comment
Education	<p>Early years education is likely to require new provision to serve additional needs. Clarendon Infant and Junior School can be expanded by 105 places. Wiltshire Housing Site Allocation Plan allocation H1.1 looks to secure land for a primary school to meet needs arising from new development.</p> <p>Wellington Academy has the potential to be expanded by 300 places. Suggesting that secondary education needs for up to 1350 new homes across the two settlements could be accommodated, provided a feasibility study was undertaken.</p>
Energy	<p>According to Scottish and Southern Electricity Network's (SSEN) Network Capacity Map, the substation and supply points around Tidworth and Ludgershall are currently unconstrained. Some of the infrastructure is unconstrained whereas some is partially constrained in relation to energy generation, according to SSEN's Generation Availability Map. This means new generators may require investment in the infrastructure to be able to connect to the grid.</p>
Green and blue infrastructure	<p>A multi functional 'Local Green Blue Infrastructure (GBI) Network' has been identified and is shown on the map in Figure 2 below. The Map indicates areas where improvements will need to be sought i.e. in the form of functional and sufficiently scaled corridors within which the aim would be to consolidate and incorporate new green and blue spaces into the existing GBI networks.</p> <p>The map in Figure 3 below identifies biodiversity and heritage assets which are also GBI assets. These features are important waypoints within the existing landscape and should be considered as being integral to how new development areas are sensitively planned.</p>
Sport and Leisure Facilities	<p>At Tidworth and Ludgershall there is an identified need for the following, as identified by the Wiltshire Playing Pitch Strategy:</p> <ul style="list-style-type: none"> • There are plenty of pitches, that can be rented out to clubs. There is a need to upgrade a 3G ATP at Wellington Academy to FA compliant quality. Development in the area could help to facilitate this, though it is of note that Wellington Academy is within Tidworth so development only at Tidworth would fund it. • There is currently no need for more pitches at Ludgershall. If there is development at the scale of hundreds of dwellings, a grass pitch may be needed. <p>Leisure Facilities</p> <ul style="list-style-type: none"> • Wiltshire Council is in the process of undertaking a Leisure Facility Needs Analysis. Any requirements relating to Tidworth Leisure Centre will be informed by this work, which will include planned growth and demand.

Topic	Comment
	<ul style="list-style-type: none"> The Leisure Centre at Tidworth is leased to and managed by Wiltshire Council. The land and building are owned by the MOD
Health	There are two GP surgeries. Capacity is reasonable but requires some hosted services to move an old GP practice currently empty may provide a solution.
Housing needs	<p>Ludgershall</p> <p>In the years 2016 2036 the older population is expected to increase by 33% in the 60 74 age group and 99% in the 75+ age group. At the same time the 0 14 age group is expected to increase by 4% and the 15 29 age group to increase by 17%. Finally, the 30 44 age group is expected to increase by 11% and the 45 59 age group to decrease by 3%.</p> <p>Local household income</p> <p>The annual average gross income is £44,300 and the net income after housing costs is £26,600</p> <p>Affordability Ratio (based on 2 bed property)</p> <p>Median price £182,300 Annual gross income £44,300 Affordability ratio 4.12</p> <p>Tidworth</p> <p>In the years 2016 2036 the older population is expected to increase by 106% in the 60 74 age group and 175% in the 75+ age group. At the same time the 0 14 age group is expected to increase by 41% and the 15 29 age group to increase by 46%. Finally, the 30 44 age group is expected to increase by 37% and the 45 59 age group to increase by 59%.</p> <p>Local household income</p> <p>The annual average gross income is £44,300 and the net income after housing costs is £26,600</p> <p>Affordability Ratio (based on 2 bed property)</p> <p>Median price £162,300 Annual gross income £44,300 Affordability ratio 3.66</p>
The local economy	<ul style="list-style-type: none"> High concentration of jobs in the Real Estate, Accommodation and Food, and Public Administration and Defence sectors MoD related property investment has been comprehensive, supporting Project Allenby/Connaught and the relocation of up to 4,000 service personnel into the garrison area Aspire Defence provides fully serviced living/working accommodation for a large proportion of British Army, employing 700 staff working across 4 camps Existing units nearby in Ludgershall at Castledown Business Park enjoy strong occupancy The community area also benefits from substantial investment by the Army through the provision of excellent sporting facilities shared with the community, such as the Tidworth Leisure Centre, which also houses a library, and the Oval athletics track Shortage of quality employment premises for small and medium sized enterprises Heavy reliance on the MoD as the local employment base affects the social and economic balance of the community Both town centres have very low unit vacancy rates compared to the national average.

Topic	Comment
	<ul style="list-style-type: none"> • There is no capacity for additional convenience retail floorspace at either Tidworth or Ludgershall up to 2036. • Additional food retail provision at Ludgershall could address the balance between the towns, allowing the community to shop locally. However, this would need to be carefully considered as not to harm either of the existing centres. • Limited capacity for additional comparison retail floorspace across both towns up to 2036.
Transport	<p>Key Features</p> <p>Tidworth has good links with the strategic road network, with the A303 located 5km to the south. Tidworth and Ludgershall benefit from the Active8 bus service which links Salisbury and Andover.</p> <p>Current constraints/local concerns</p> <ul style="list-style-type: none"> • Highway congestion causes delays at peak periods. • The A338 is a primary route and as such experiences high numbers of HGVs. However, the route has several pinch points, such as at Collingbourne Ducis, which compromise this status. • Tidworth and Ludgershall do not have a railway station. The nearest railway station is in Andover some 7 miles away. <p>Opportunities</p> <ul style="list-style-type: none"> • As part of the Army Basing programme, a transport strategy has been developed that highlights key junction improvements, particularly on the A338. Funding has been secured through the planning process to implement these improvements. • The significant population influx arising from Army Basing may further increase the numbers of those walking and cycling in the area.

Figure 2 Map showing Tidworth and Ludgershall Green and Blue Infrastructure Network and improvement corridors (numbered). (These are draft plans from the emerging Green and Blue Infrastructure Strategy and may change)

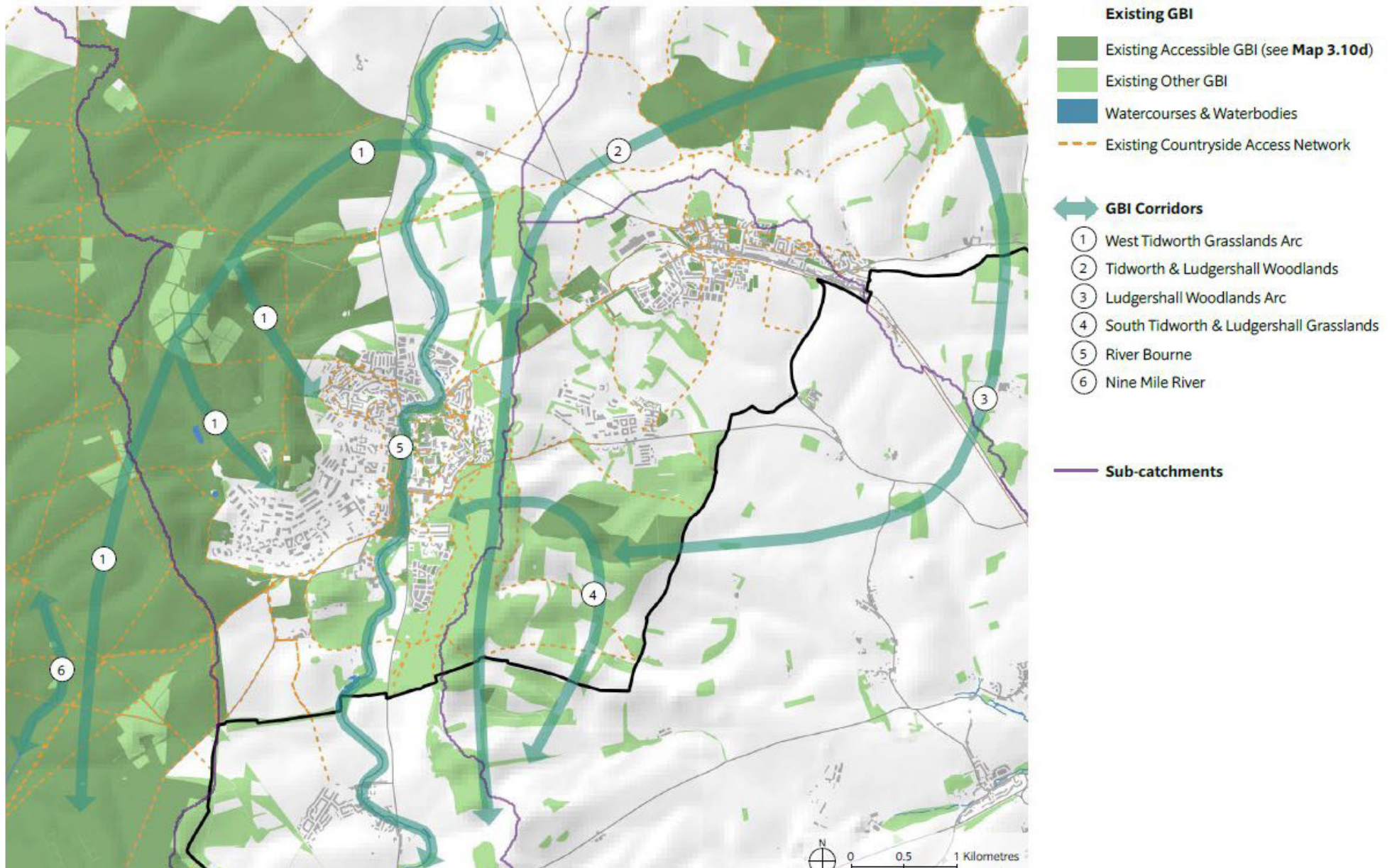
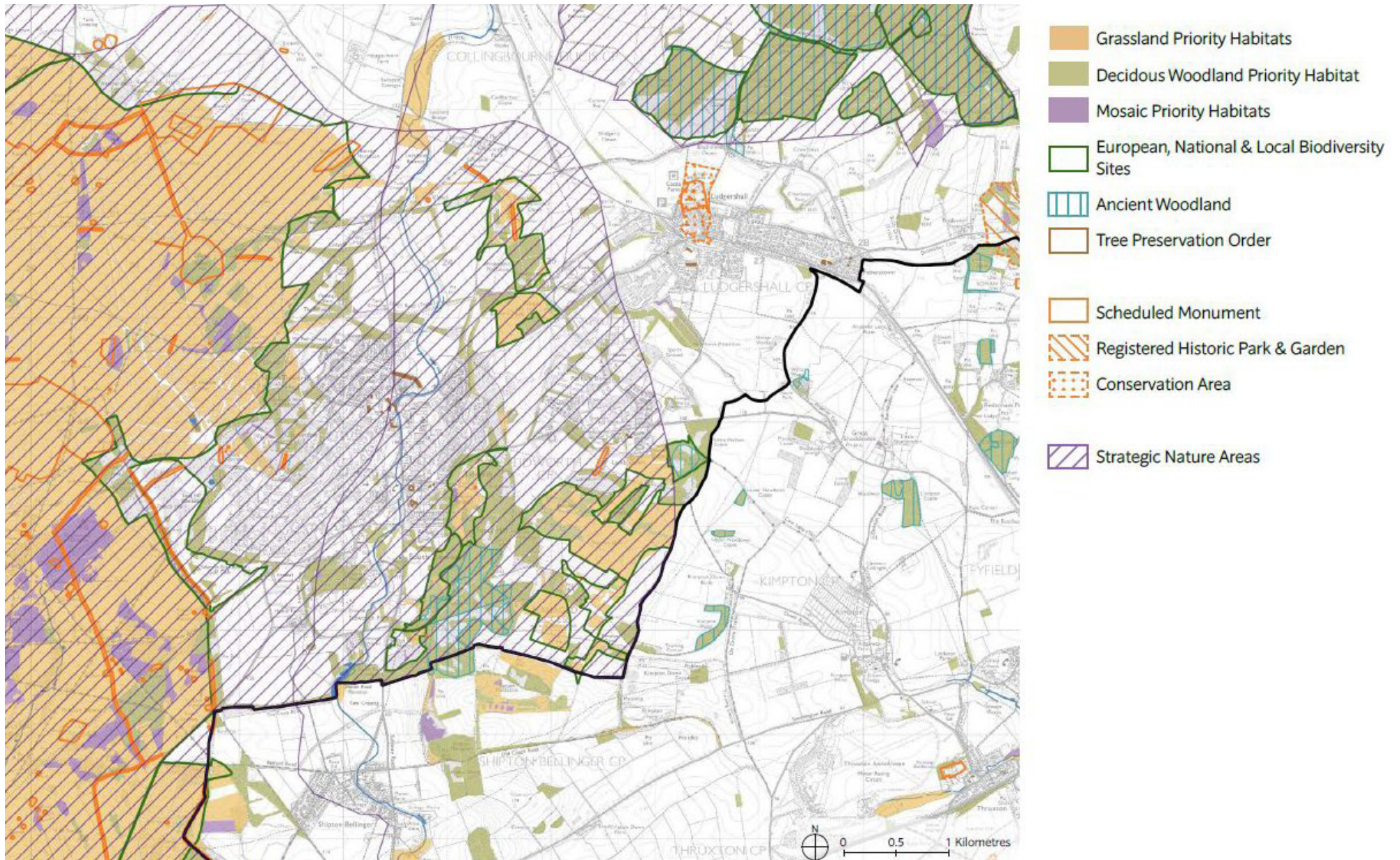


Figure 3 Map showing Tidworth and Ludgershall Green and Blue Infrastructure Assets in relation to Biodiversity and Heritage. (These are draft plans from the emerging Green and Blue Infrastructure Strategy and may change)



Wiltshire Council Local Plan Planning for Tidworth and Ludgershall

**This document was published by the Spatial Planning Team,
Economic Development and Planning, Wiltshire Council**

**For further information please visit the following website:
www.wiltshire.gov.uk**

Appendix C



**Statement of Common Ground
between Fareham Borough Council and
the Partnership for South Hampshire**

**Version 2.0
October 2021**

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1 Introduction

What is a Statement of Common Ground?

- 1.1 The Duty to Co-operate, introduced by the Planning and Compulsory Purchase Act 2004 (amended by Section 33A of the Localism Act) places a legal duty on local planning authorities, county councils in England and other prescribed bodies to engage constructively, actively and on an ongoing basis to develop development plan documents, including activities that prepare the way or support the activities of preparing development plan documents, in respect of strategic matters.
- 1.2 The Duty to Co-operate in relation to planning of sustainable development as set out in Section 33A of the Localism Act 2011 specifically relates to 'strategic matters' which are defined as follows:
- Sustainable development or use of land that has or would have a significant impact on at least two planning areas, in particular in connection with sustainable development or use of land for or in connection with strategic infrastructure which has or would have a significant impact on at least two planning areas, and
 - Sustainable development or use of land in a two-tier area if the development or use— (i) is a county matter, or (ii) has or would have a significant impact on a county matter.
- 1.3 Paragraph 20 of the National Planning Policy Framework (NPPF) also outlines strategic priorities that a local plan should have to cover. They include:
- Housing (including affordable housing), employment, retail, leisure and other commercial development;
 - The provision of infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
 - Community facilities (such as health, education and cultural infrastructure); and
 - Conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 1.4 In accordance with the NPPF (paragraph 24), public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out above. This forms part of each local planning authority's evidence for their respective emerging Local Plans.
- 1.5 This Statement of Common Ground (SoCG) has been prepared in accordance with Paragraph 27 of the NPPF and the section of the Planning Practice Guidance on Maintaining Effective Cooperation. It has also followed guidance prepared by the Planning Advisory Service (PAS) on this matter. It has been prepared in parallel with the Publication Local Plan (Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012¹). This Plan, upon adoption, will supersede the existing Fareham Local Plan Parts 1 and 2. The new Local Plan will cover the period to 2037 and sets out the vision, objectives and policies to guide future development in the Borough over the plan period.

What does this document include?

- 1.6 Section 2 outlines the administrative areas covered by the SoCG.

¹ <http://www.legislation.gov.uk/ukxi/2012/767/regulation/19/made>

- 1.7 Section 3 sets out the Strategic Issues which form the background to this SoCG.
- 1.8 Section 4 sets out the area of agreements which have been reached on the Strategic Issues.

What parties are involved with this Statement of Common Ground?

- 1.9 This SoCG is an agreed statement between Fareham Borough Council (FBC) and the Partnership for South Hampshire (PfSH) in relation to FBC’s Revised Publication Local Plan.
- 1.10 The first version of the SoCG was agreed by officers. This second version was updated in October 2021 and presented to PfSH Joint Committee to coincide with the updated PfSH SoCG including an updated position on unmet need (see paragraph 4.7)

2.0 Strategic Geography

- 2.1 This SoCG relates to the area covered by the Partnership for South Hampshire (PfSH) as shown on the map below and highlights the Borough’s location within the PfSH boundary.

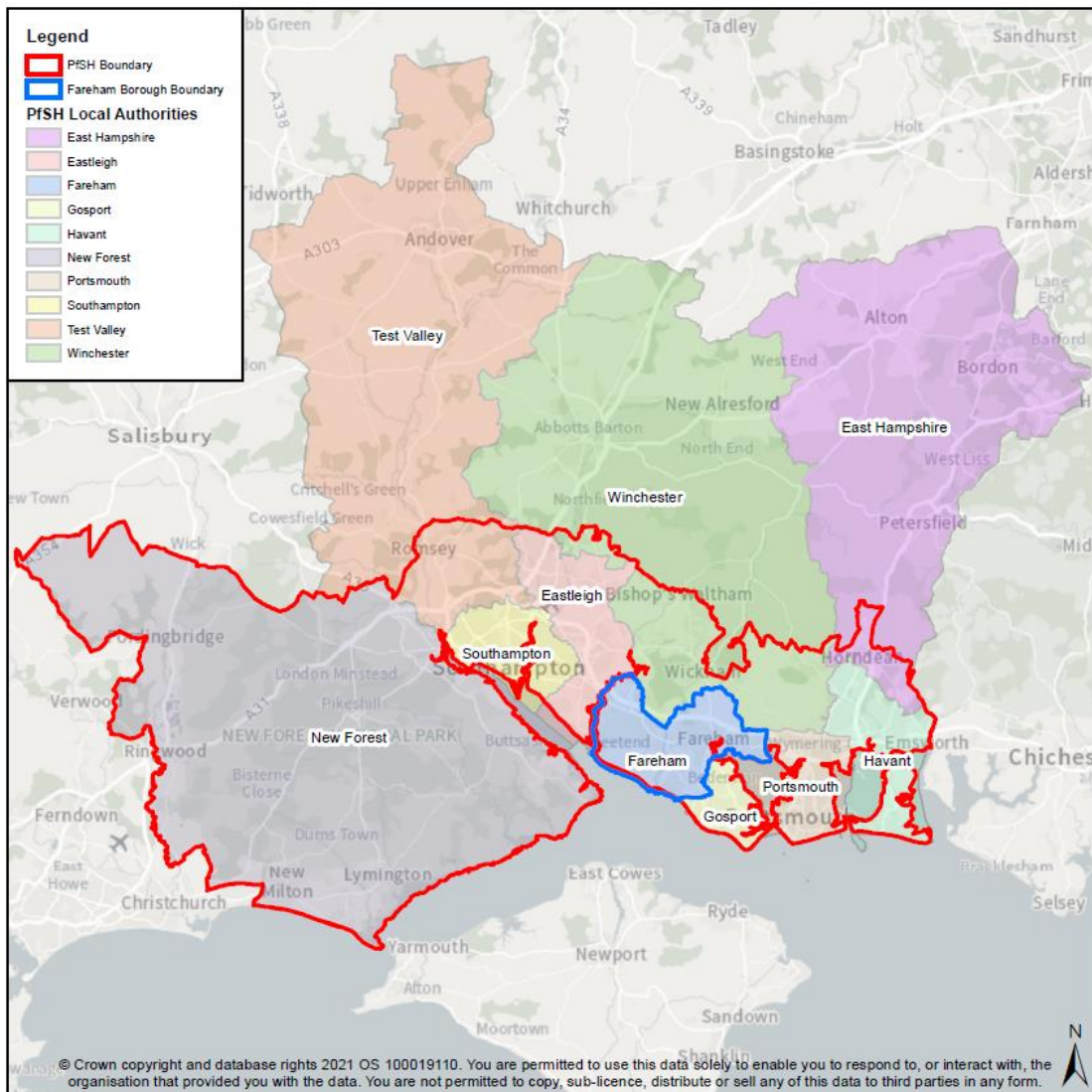


Figure 1: Fareham Borough Council and Partnership for South Hampshire (PfSH) Boundaries

2.2 The Planning Practice Guidance states that a SoCG will need to cover the area that policy making authorities and public bodies cooperate within, depending on the strategic matters being planned for and the most appropriate functional geography for the gathering of evidence and the preparation of planning policies. However, local planning authorities may have more than one Statement of Common Ground where there are strategic cross-boundary matters to be addressed.

3.0 Background

3.1 Paragraph 16c of the NPPF states that “Plans should:

be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees.”

3.2 In addition, Chapter 3 provides a framework for maintaining effective cooperation with relevant stakeholders. Paragraph 24 of the NPPF sets out that:

“Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies’ on strategic matters that cross administrative boundaries.”

3.3 Fareham Borough Council has an obligation to work with neighbouring authorities and bodies to identify and address unmet needs within the region. FBC has been a member of the Partnership for South Hampshire (PFSH) since it formed in 2003. The partnership consists of a number of district and unitary authorities, the county council and a national park authority. In 2016, the PFSH authorities agreed a Spatial Position Statement setting out the overall need for development to 2034 and proposed development targets for each of the member Councils, helping Councils meet their duty to co-operate.

3.4 Work to update this Spatial Position Statement with a new Joint Strategy has begun and the PFSH authorities entered into and agreed a Statement of Common Ground in October 2019, which was updated in September 2020 and again in October 2021. This sets out the strategic issues to be addressed in the sub-region and the process for resolving them. The PFSH SoCG also sets out the process and workstreams that will lead to the review of the current PFSH Spatial Position Statement (SPS) and the production of a Joint Strategy. The Joint Strategy will be a non-statutory high-level strategic plan to guide development across the sub-region to 2036 and beyond to 2050. The latest version of the PFSH Statement of Common Ground was approved at a meeting of the PFSH Joint Committee on the 25th October 2021². Fareham Borough Council remains a committed member of PFSH and to the work to produce a new Joint Strategy.

3.5 This Statement of Common Ground outlines the key issues and relationship of the Fareham Local Plan with strategic planning activities undertaken by PFSH and areas for agreement in Section 4.

² <https://www.push.gov.uk/wp-content/uploads/2021/10/Item-11-Statement-of-Common-Ground-Revisions-and-Update.pdf>

4.0 Strategic Matters

- 4.1 This section sets out where agreement has or has not been reached on cross border strategic matters.

Housing Need and Supply

- 4.2 Fareham Borough Council's (FBC) emerging Local Plan aims to deliver sufficient land to meet the housing need for the Borough and make a contribution to wider unmet need. FBC has undertaken a Regulation 19 consultation and three Regulation 18 consultations on that basis. FBC are currently consulting on a Revised Publication Local Plan aligned with the Government's standard methodology for calculating housing need. Since the start of the Local Plan review, it has been FBC's intention to meet the housing need of the borough.
- 4.3 The current standard methodology takes account of population growth and housing affordability with a cities and urban centres uplift for urban local authorities in the top 20 cities and urban centres. National policy currently dictates that Local Planning Authorities are to use the 2014-based household projections as the basis for calculating their housing need, unless there are exceptional circumstances where alternatives may be appropriate. The household projections are then adjusted to take account of affordability using the most recent affordability data (March 2021). Therefore, the housing requirement for the borough is 541 homes per annum.
- 4.4 The strategic housing provision, described in Strategic Policy H1 (Housing Provision) of the Revised Publication Local Plan, is based on the standard methodology figure re-confirmed by the Government in December 2020. The level of housing provision in the Revised Publication Local Plan includes a contingency of 11% of the overall housing supply and an additional contribution of 900 homes, plus the 11% contingency, towards unmet need from neighbouring authorities and to address any potential slippages in delivery. Therefore, the overall growth level for the Borough until 2037 is projected to be 9,556 new dwellings.
- 4.5 Strategic Policy H1 along with the Housing Allocations identified in the Revised Publication Local Plan show how FBC will deliver the above identified housing requirement. The stepped trajectory included in the Plan shows that whilst challenging, the housing requirement is deliverable and the contribution to unmet need is currently considered appropriate.
- 4.6 It is understood from the work on the revised PfSH Statement of Common Ground that, based on standardised plan periods of 2021-2036, there is a predicted shortfall in the region of some 13,000 homes across the sub-region³. This figure is derived from eleven authorities who are all at different stages of plan preparation and is set out in the PfSH Statement of Common Ground. The housing need estimated for Southampton includes the 35% uplift in need that the Government has applied to the 20 largest cities in England and this element alone equates to 5,400 dwellings between 2021 and 2036.
- 4.7 The numbers presented at table 4 in the October 2021 Statement of Common Ground are based on the existing standard methodology for calculating housing need. The housing need figures in the Statement of Common Ground factor in the affordability data published in March 2021 and the cities and urban centre uplift which applies to the housing requirement for Southampton, with a base date of 2021.
- 4.8 The level of unmet need within neighbouring authorities and across the sub-region is likely to alter as plans emerge within the sub-region and the government makes

³ Based on figures released in September 2020.

changes to the standard methodology. FBC are committed to inputting towards this development of the Joint Strategy which considers how partner authorities will meet housing needs.

Agreed Position

- 4.9 Both Fareham Borough Council and the Partnership for South Hampshire (PfSH) recognise there is ongoing work in relation to housing need and supply and that the level of unmet need will alter as other Local Plans progress. Both bodies agree to support the ongoing partnership working on housing need and unmet need being delivered through the PfSH Statement of Common Ground and the review of the Spatial Position Statement and production of a new Joint Strategy and will continue to contribute towards the project. PfSH is supportive of authorities proceeding with local plans before the production of the Joint Strategy has concluded and recognises the importance of partnership authorities having up-to-date Local Plans.

Matters to be Resolved

- 4.10 None.

PfSH Strategic Development Opportunity Area's (SDOA's)

- 4.11 The Partnership for South Hampshire (PfSH) is in the process of undertaking work to identify the level of unmet need within the PfSH authorities. This work, which is not yet in the public domain, will identify a number of Strategic Development Opportunity Areas (SDOA's) and different development scenarios which could be selected to address identified unmet need in the PfSH sub-region as highlighted above. The assessment of the SDOA's will include a transport assessment and sustainability appraisal. To date the Council has been an active party in discussions and technical assessment undertaken on the potential SDOA's within the borough and the wider sub-region. The Fareham Local Plan goes ahead of this workstream.
- 4.12 PfSH acknowledges that Fareham's Revised Publication Local Plan has identified sufficient sites in its Borough that will allow the Plan to meet Fareham's need and make a contribution to the unmet need.

Agreed Position

- 4.13 Both parties acknowledge that the unmet need position is changing as plans develop, and as the housing need and supply picture across the sub-region changes, and that the Fareham Local Plan has reached the Regulation 19 Publication stage before information on the pSDOAs is advanced enough to influence Local Plans. However, PfSH recognises Fareham's contribution to unmet need and continued work in the partnership. The Council are supportive of the PfSH work and the Council remain an active partner in discussions. Should the Joint Strategy work identify sites not considered suitable for development in the Fareham Local Plan technical evidence, this would be a matter for the Local Plan review.

Matters to be Resolved

- 4.14 None

Additional workstreams

Employment Need

- 4.15 In the Publication Local Plan, Fareham's employment need was derived from the Council's own evidence and amounted to 104,000 square metres (sqm) over the plan period. Following the publication of the Stantec work by PfSH⁴ and an increase for Fareham to 140,000 sqm, the Revised Publication Local Plan proposed this higher need as the basis for its employment need figure. Both parties agree that this is a sensible approach to align Fareham's Local Plan with published PfSH evidence.

Countryside Gaps

- 4.16 A key aspect of the FBC's development strategy and selecting sites for allocation in the FLP is the desire to retain the separate identity of individual towns, villages and local communities and to prevent their coalescence by retaining open and undeveloped countryside gaps between them. Position Statement S1 of the SPS reflects this important principle. It makes provision for local authorities to identify in local plans strategic countryside gaps of sub-regional significance as well as local countryside gaps which are of fundamental local importance.
- 4.17 Strategic Policy DS2 of the FLP sets out to do this and identifies two countryside gaps where development, which would physically or visually diminish the gap or have an urbanising effect detrimental to retaining its openness, its character or the separate identity of adjoining settlements, will not be permitted.

Nutrient Neutrality

- 4.18 Following case law in 2018 and evidence creating uncertainty around the contribution of new development in Fareham to deteriorating water quality (eutrophication) in the Solent and the effect this is having on the internationally designated sites, there is greater emphasis on the burden of proof to demonstrate that new development will not cause a likely significant effect on the integrity of these sites. Development needs to demonstrate that it would prevent any net increase in nutrients and therefore be 'nutrient neutral'. The Council have created a nutrient budget to demonstrate the extent of nutrient loading and the amount of mitigation offsetting (in kgs/TN/yr) that would be required to ensure that development proposed within the Plan would not result in a likely significant effect on designated sites, through deteriorating water environment. Mitigation for each individual development allocation in the Plan is then identified through two main pathways, onsite and offsite. There are currently at least three offsite schemes which development in the Local Plan can utilise to achieve nutrient neutrality.
- 4.19 The Council continues to work with PfSH through the Water Quality Working Group to coordinate the provision of a strategic PfSH wide solution⁵ in the medium to long term. The includes the appointment of a Strategic Environmental Planning Officer to take forward the creation of a pilot sub-region mitigation scheme.

5.0 Signatories

- 5.1 Both parties agree that this statement is an accurate representation of matters discussed and issues agreed upon.


⁴ [\(Public Pack\) Agenda Document for Partnership for South Hampshire \(PfSH\) Joint Committee, 22/03/2021 18:00 \(push.gov.uk\)](#)

- 5.2 It is agreed that these discussions will inform the Fareham Borough Council Local Plan 2037 and both parties will continue to work collaboratively in order to meet the duty to cooperate.
- 5.3 For the Partnership for South Hampshire (PfSH) the Statement of Common Ground is signed by the Paddy May, PfSH Co-ordinator.

Signed:



Signed:



Name: 

Position: PfSH Co-ordinator

Partnership for South Hampshire

Date: 26 October 2021

Name: 

Position: Director of Planning and
Regeneration

Fareham Borough Council

Date: 26 October 2021