

**Representations to
Regulation 18 Consultation
Test Valley Borough Local
Plan to 2040**

**Land North East of Drove Road,
Chilbolton**

**[REDACTED]
BSc (Hons) Dip UP MRTPI**



On behalf of Mr J Painter

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<u>Contents:</u>	Page
1.0 INTRODUCTION	3
The Site.....	3
2.0 RESPONSE TO LOCAL PLAN REVIEW VISION, KEY CHALLENGES AND OBJECTIVES (SECTION 2) AND SPATIAL STRATEGY (SECTION 3)	6
3.0 RESPONSE TO LOCAL PLAN POLICIES.....	8
Policy SSP1	8
Policy SP2	8
Policy SP6	9
4.0 CONCLUSION.....	11

1.0 **INTRODUCTION**

- 1.1 These representations have been prepared by Southern Planning Practice on behalf of Mr J Painter who owns the Land North East of Drove Road, Chilbolton, in response to Test Valley Regulation 18 Local Plan to 2040 Consultation.
- 1.2 The site is located to the north east of Drove Road, Chilbolton, which is in the northern section of Test Valley. The site is accessed off Eastmans Field to the west of the site. The site is well related to both Stockbridge and Andover which are both key settlements in the Borough of Test Valley which provide a range of services and facilities as well as a range of employment opportunities.
- 1.3 The site was submitted to the Test Valley Strategic Housing and Economic Land Availability Assessment (SHELAA) (2021). The site was considered under site reference 389 for the development of 300 dwellings and fell within the category of 'Northern Test Valley Sites identified outside of Local Plan Settlement Boundary where a change in policy is required for development' set out in Appendix 4 of the SHELAA. If the site were to be allocated as part of the Local Plan, the site would be included within the settlement boundary of Chilbolton.
- 1.4 These representations set out responses in respect of land north east of Drove Road, to all relevant policies and sections of the Regulation 18 Consultation document. In addition to the responses, the representations set out the opportunity presented by the site whilst demonstrating the site is available, suitably located and achievable, considered against the definitions contained in the National Planning Policy Framework (NPPF) 2021, that would help to meet Test Valley's housing need.
- 1.5 For ease of reference, submitted together with these representations is a Site Location Plan which details the location and extent of the site.

The Site

- 1.6 The site is located to the north east of Drove Road and to the west of Martins Lane in Chilbolton which is in the northern section of Test Valley. The site is located immediately to the north east and south of the built-up area of Chilbolton. The site is therefore very well located to

existing residential development and is visually quite well contained in views from the wider countryside by existing built form to the north, south and west.

- 1.7 The site is bound to the north and west by existing residential development. To the south is further residential development and to the east the site is bound by a mix of hedgerow and trees.
- 1.8 There are no known environmental, heritage or landscape designations that apply to the site itself. The site is located to the south of the Chilbolton Conservation Area where there are many listed buildings, mostly Grade II, located in the historic core of the settlement. The site is currently used for grazing and therefore does not have a high ecological value.
- 1.9 The site is of an irregular shape which provides an opportunity, not a constraint. It presents an opportunity to link the northern area of Chilbolton to the southern section. The site is currently accessed via an existing field gate off Eastmans Field. There is existing residential development located along Eastmans Field leading to the access point.
- 1.10 The site is not identified as being in an area of flood risk on the Environment Agency's flood risk map.
- 1.11 The site extends to approximately 9.2 hectares and therefore it would be capable of accommodating circa 300 homes including affordable housing and self build units at a density appropriate to the existing built form and the surrounding area. The site has the potential to deliver the majority of the homes within the first 5 years of the plan period with the remainder being delivered in years 6-10. However, the landowner has a long-term commitment to develop the site and can deliver housing in a phased approach in line with local demand. This may mean the site delivers housing beyond the plan period.
- 1.12 The site is a suitable location for development adjacent to the existing residential development in Chilbolton. It would constitute a logical, sustainable extension to the village and is available for development now. The site is owned by one landowner and therefore there are no constraints regarding land ownership.
- 1.13 The site could be developed to accommodate circa 300 homes including a policy compliant level of affordable housing and self-build opportunities, with the potential to include the

provision of a community medical centre or office building subject to local demand, a play area, allotments and a permissive footpath connecting the existing footpath from Frog Lane to Drove Road.

2.0 RESPONSE TO LOCAL PLAN REVIEW VISION, KEY CHALLENGES AND OBJECTIVES (SECTION 2) AND SPATIAL STRATEGY (SECTION 3)

- 2.1 We are supportive of Test Valley's vision set out on page 18 of the Local Plan Regulation 18 Consultation document. We strongly agree with the Council's priority to provide access to good quality homes that will meet a range of needs and aspirations, including affordable housing. In addition to focusing most of the growth in the main settlements of Andover and Romsey, the Council should look to all settlements and available land within the district in sustainable locations to help meet this priority.
- 2.2 In order to achieve and maintain a robust five-year housing land supply, the council should look to all settlement tiers in the hierarchy to deliver homes through a range of small, medium and strategic sites. By allocating a range of sites, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements and to ensure they are not vulnerable to unsustainable, speculative development. The allocation of land north east of Drove Road would provide a valuable contribution to the delivery of homes in the rural area of Test Valley whilst contributing to the overall housing land supply of the Borough.
- 2.3 We agree that the 10 strategic objectives set out in the Regulation 18 document are all-encompassing. With regards to the strategic objective relating to housing, whilst we agree that the identified housing need should meet the needs of the community up to the end of the plan period, which is set out at paragraph 2.54 to be 541 homes per annum, we consider that in light of paragraph 60 of the NPPF, which refers to the Government's objective of significantly boosting the supply of homes, the Council should be more ambitious and plan for the objectively assessed housing need as a minimum. As per the Planning Practice Guidance (PPG) (Paragraph: 001 Reference ID: 68-001-20190722), the standard method for calculating local housing need provides a **minimum** (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach. We do not believe that there are an exceptional circumstances which would justify an alternative approach in Test Valley and as such, the figure of 541 homes per annum should be used as a minimum when calculating the housing need over the plan period.

2.4 Indeed, in order for the Local Plan Review to meet the 'positively prepared' test of soundness as required by paragraph 35 a) of the National Planning Policy Framework (NPPF), the Local Plan Review must:

“provide (ing) a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”.

2.5 The above should be considered thoroughly at the next plan making stage.

2.6 The objectives look to strengthen communities, enhance the vitality and viability of town, district and local centres and promote a vibrant and resilient local economy. The allocation of land north east of Drove Road would contribute a significant addition to the population of Chilbolton which would help to achieve these objectives. The site could be delivered in accordance with local demand with a policy compliant level of affordable housing and self-build opportunities.

2.7 Section 3 of the Local Plan Regulation 18 Consultation document sets out the spatial strategy for the Borough. It is apparent that both historically and going forward development has been directed at the main settlements of Andover and Romsey. Whilst we understand the strategy behind this, we would like to highlight that supporting the rural economy is as, if not more important, than seeking to grow existing sustainable settlements.

2.8 We support the sustainable spatial strategy set out on page 29 of the Regulation 18 document and particularly encourage the sustaining of vibrant and healthy communities through maintaining and enhancing the role of larger urban and rural settlements through accommodating development that meets the needs of local communities and supports existing accessible facilities. The spatial strategy also highlights the importance of development being encouraged elsewhere in the Borough to support the role of smaller rural settlements. The allocation of land north east of Drove Road could help to achieve these objectives of the spatial strategy.

2.9 Further comments on the spatial strategy and in particular Policy SSP1 are set out below.

3.0 RESPONSE TO LOCAL PLAN POLICIES

3.1 This section of the representations responds to Policies SSP1, SP2 and SP6 the Local Plan Review Regulation 18 Consultation document.

Policy SSP1

3.2 We support the Council's approach to splitting the district into two spatial areas, North and South. It is acknowledged that Andover and Romsey will be a focus for the majority of new development, and we encourage this approach to deliver vibrant and resilient town centres.

3.3 We also support the tiered approach to the settlement hierarchy; however we would like to highlight that there are some vast differences between the settlements included within the Tier 4 category both in terms of number of facilities and also distance to the two town centres, which was not a consideration in the ranking of each settlement. Appendix 1 of the Local Plan Review Regulation 18 Consultation document confirms that Chilbolton is one of the highest ranking, most sustainable settlements within the Tier 4 settlements and therefore when considering the development potential of the settlement this should be given due consideration and weight.

3.4 Further, the sustainability of Chilbolton and its higher ranking within Tier 4 is a strong indicator that it can and should accommodate new development over the plan period. Land north east of Drove Road presents a unique opportunity to provide an additional population in a sustainable settlement which would contribute to the vibrancy of the existing community and its facilities and services as well as having the potential to provide further services and facilities.

Policy SP2

3.5 Policy SP2 requires all development to achieve high quality design which will conserve and enrich the character and identity of the Borough. We support the Council's approach to new development and emphasise that in addition to focusing growth in the key areas of Romsey and Andover, the Council should also look to a range of settlements which can accommodate sustainable, proportional growth.

- 3.6 Chilbolton is one of the most sustainable settlements in the Tier 4 settlements as it offers a range of facilities and services and good public transport links to further local facilities and employment opportunities. The settlement is therefore capable of accommodating well designed, sustainable development over the plan period. Whilst it is apparent that Romsey and Andover will be the prime focus for growth over the plan period, we believe that additional sites need to come forward in some of the lower tier settlements to provide further population to support the local rural economy and the longevity of existing facilities and services. New development in lower tier settlements also presents the opportunity for further local facilities and services to be provided if the new population presents such demands. The allocation of land north east of Drove Road would contribute a noteworthy population which would provide a valuable contribution to supporting existing local facilities and services as well as presenting the opportunity to deliver further local facilities and services.
- 3.7 We support the Criterion a) which sets out that development will be based on comprehensive design principles derived from a contextual analysis of the site and its surroundings. Whilst we understand that the Regulation 18 Stage 2 will go into further details on the Development Management policies in particular, we believe that the design principles should be achievable to deliver healthy, well designed places. We reserve the right to comment on the design principles once they are further developed.

Policy SP6

- 3.8 Paragraph 11 of the National Planning Policy Framework (2021) states that Local Plans should positively seek opportunities to meet the development needs of their area - as a minimum – but also be sufficiently flexible to adapt to rapid change as well as any needs that cannot be met within neighbouring areas. This stance is also reiterated in the Planning Policy Guidance.
- 3.9 Policy SP6 sets out that the housing requirement for the borough over the plan period is a minimum of 10,820 homes with the split being 6,167 in the northern section of the borough and 4,653 in the southern section of the borough. We support the recognition that the housing requirement is a minimum figure which is in accordance with the requirement of paragraph 11 b) of the National Planning Policy Framework and the Planning Practice Guidance. We

therefore look forward to the development of the housing requirement as the Local Plan progresses.

- 3.10 In addition to Test Valley's housing need, the Local Plan should look to firstly be flexible to adapt to rapid change and secondly help to meet unmet need arising from neighbouring areas. Test Valley falls within the South Hampshire sub-region and is one of the local authorities which comprise the Partnership for South Hampshire (PfSH). Therefore, the borough should look to help accommodate any unmet need which is arising from other Local Planning Authorities in this area.

4.0 **CONCLUSION**

- 4.1 Paragraph 16 of the NPPF (2021) makes it clear that plans should be prepared in a way that is aspirational but deliverable.
- 4.2 As currently drafted, whilst we appreciate the Local Plan is still at an early stage, the emerging local plan does not indicate which sites will be allocated and therefore we would like to further highlight the opportunity that land north east of Drove Road presents.
- 4.3 The Local Plan must look to support the Government in its objective to significantly boost the supply of new homes as it is quite apparent the need for housing is now.
- 4.4 It is considered that the council should allocate sites of varying size in different tiers of the settlement hierarchy to provide a flexible, responsive, and deliverable housing land supply. In this respect, we would point out the suitability of the land north east of Drove Road.
- 4.5 In accordance with the definition of 'deliverable' within the National Planning Policy Framework (2021), the site is available for development now, it is a suitable and sustainable location for future residential development, and it is achievable with a realistic prospect that housing will be delivered on site within five years following its allocation. The SHELAA assessment confirms that the site could deliver the majority of homes within the first 5 years of the plan period with the remainder coming forward in years 6-10. However, the landowner has a long-term commitment to develop the site and can deliver housing in a phased approach in line with local demand. This may mean the site delivers housing beyond the plan period which is encouraged by paragraph 22 of the NPPF (2021).
- 4.6 The site could be delivered to provide a landscape-led residential development which would link the northern and southern existing residential areas of Chilbolton. The site could be masterplanned to include a potential development area for residential development, a medical centre/community office building and together with open space including allotments, a play area, a permissive footpath connecting the existing footpath on Frog Lane to Drove Road and links to green infrastructure together with links to the wider area.
- 4.7 In conclusion, as demonstrated throughout these representations, the land north east of Drove Road is available, suitable and achievable and would make a positive contribution to help

meet Test Valley's housing need, in particular the housing need for the northern area. The site could also potentially contribute to meeting unmet need arising from neighbouring authorities within the PfSH area. The site should therefore be considered for allocation in the emerging Local Plan.