

Test Valley Borough Council Draft Local Plan 2021-2040 (Regulation 18 Stage 2 Consultation).

**Representations in support of residential
development of Land east of Ludgershall (Policy
NA7).**

For and on behalf of The Faberstown Trust.

March 2024.



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1.0 Introduction.

- 1.1 The following representations are made by Pegasus Group on behalf of our client, The Faberstown Trust. They are made in response to the current consultation by Test Valley Borough Council (TVBC) following publication of its Draft Regulation 18 Stage 2 Local Plan. This consultation is running between **6th February – 2nd April 2024**.
- 1.2 The Faberstown Trust owns Land to the East of Ludgershall (“the site”). These representations, and previous promotional work undertaken to date on behalf of The Faberstown Trust set out the justification for allocating the site as a sustainable and attractive location for residential-led development.
- 1.3 As a result, TVBC has allocated the subject site under Policy NA7 for residential development in its draft Local Plan. The site boundary identified in the draft Local Plan is extracted below:



Figure 1 – Site Location Plan (extracted from Reg 18 Stage 2 Local Plan)

- 1.4 For the reasons set out in these representations and the draft Local Plan (including its evidence base), the allocation of the site as a sustainable location for new housing development is strongly supported and the site should be carried forward as an allocation in the Regulation 19 Publication version of the TVBC Local Plan 2040.

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2.0 Housing Need in Test Valley and South Hampshire.

Standard Method Housing Need

- 2.1 The TVBC Reg 18 Local Plan produces a current calculation of its housing need based on the Standard Method, of a minimum of **11,000 homes** required to be provided across the Test Valley Borough between 2020–2040. The equates to **550 homes needing to be delivered per year between 2020–2040**. The Test Valley borough is split into two Housing Market Areas (HMAs) covering the northern and southern areas of the Borough and housing allocations are proposed across both HMAs to meet the Council's minimum housing requirement.
- 2.2 As part of its Local Plan evidence base, the Council has published a Strategic Housing Market Assessment (SHMA) which found that there is no growth funding or strategic infrastructure improvements proposed in or around the Borough that would justify increased housing needs above the minimum Standard Method figure.
- 2.3 However, at para 3.60 of its Reg 18 Stage 2 Local Plan, the Council confirms that Havant Borough Council formally contacted them during their Reg 18 Stage 1 LP consultation requesting that Test Valley helps them to meet their unmet housing needs.

'We received comments on the Regulation 18 Stage 1 consultation document from Havant Borough Council formally requesting the Council to help meet their unmet housing needs.'

Partnership for South Hampshire (PfSH)

- 2.4 Para 3.61 acknowledges the Spatial Position Statement published by PfSH in December 2023, setting out the current level of housing need and supply in South Hampshire.
- 2.5 Para 2.17 of the draft Local Plan specifically identifies the well-reported unmet need across the sub-region of South Hampshire (which part of TVBC lies within) of approximately 12,000 homes to 2036.
- 2.6 TVBC confirm that the Council have worked collaboratively with authorities across South Hampshire on a range of strategic planning matters, including a joint evidence base.
- 2.7 The Partnership for South Hampshire (PfSH) comprises a collaboration of Local Planning Authorities in the region, working together to facilitate strategic planning functions necessary to support growth. The Councils forming the partnership include:
- Eastleigh Borough Council;
 - East Hampshire District Council (part);
 - Fareham Borough Council;
 - Gosport Borough Council;
 - Hampshire County Council (part);
 - Havant Borough Council;
 - New Forest District Council;

- New Forest National Park (part);
- Portsmouth City Council;
- Southampton City Council;
- **Test Valley Borough Council (part);** and
- Winchester City Council (part).

2.8 In December 2023, the PfSH published an updated Spatial Position Statement setting out the overall need for, and distribution of, development in South Hampshire. This Position Statement was produced collaboratively between the constituent authorities (listed above) that make up the PfSH.

2.9 Given its membership of PfSH, the Council contributed to and approved the findings and conclusions of the PfSH Position Statement. Some of its relevant findings and recommendations are set out below.

Part of TVBC within the sub-region

2.10 The southern part of the Test Valley Borough lies within the PfSH boundary. Importantly, the settlements of Romsey, Nursling, Rownhams, Chandler's Ford, Valley Park, North Baddesley and Chilworth all lie within the boundary and therefore contribute to the sub-region both in terms of housing residents in the region and contributing to the economic growth of the area.

Housing Need in South Hampshire

Table 1: Comparison of housing need and supply 2023 – 36

Local Authority	Annual Housing Need using Standard Method (dpa)	Total housing need 2023 – 2036	Identified Supply = Commitments, local plan allocations + windfall estimate	Shortfall/ surplus
East Hants (part)	113	1,469	1,275	-194
Eastleigh	667	8,671	6,160	-2,511
Fareham	541	7,033	9,356	+900 ¹⁰
Gosport	353	4,589	2,518	-2,071
Havant	516	6,708	4,105	-2,603
New Forest	1,056	13,278	8,076	-5,652
Portsmouth	899	11,687	11,304	-383
Southampton	1,475	19,175	15,951	0 ¹¹
Test Valley (part)	182	2,366	3,109	+743
Winchester (part)	235	3,055	3,055 ¹²	0
Total	6,037	78,481	64,909	-11,771¹³

Table 1 – extracted from PfSH Spatial Position Statement

2.11 The December 2023 Position Statement discusses housing need and supply. The Statement identifies that there is a major need to provide new homes for a growing and aging population and for an increasing number of households. Table 1 of the Statement, reproduced above, provides an estimate of all of the PfSH authorities' housing needs.

2.12 As illustrated in Table 1, the total shortfall across the sub-region is clearly significant, at around 12,000 homes.

2.13 Given this shortfall, the Position Statement advocates a 2-stage approach to addressing the needs of those authorities that are currently unable to meet their needs (para 6.33–6.34):

'Stage one: in the short to medium term the following authorities should be able to meet and potentially exceed NPPF 2023 standard method-based housing needs in their respective local plan areas:

- East Hampshire
- Eastleigh
- Fareham
- **Test Valley**
- Winchester.

Stage two: in the longer term, the Broad Areas of Search for Growth, identified in SPS8 below, will be considered in local plans, including the contribution they can make to ongoing unmet housing need in the sub-region.'

2.14 The draft TVBC Local Plan sets out how the Council believe that they essentially meet the requirement of 'Stage 1' of the two-stage approach that PfSH endorses. The NPPF states at paragraph 67 that a Council failing to set out suitable policies to meet its identified housing need across a plan period, without exceptional circumstances, would render a plan unsound. The Council is therefore according with the NPPF (which is critical) and the PfSH Position Statement in this regard.

Unmet need in the sub-region

2.15 However, 'Stage 1' of the PfSH approach to meeting housing needs suggests that the above authorities should be able to 'meet and potentially exceed' NPPF 2023 standard method-based housing needs. The TVBC draft Local Plan only meets its housing requirement. It does not exceed it and does not set out any reason why it has not done so.

2.16 National Policy (NPPF) is clear that where unmet housing need exists (as it does in South Hampshire), neighbouring authorities need to help provide for these housing needs.

2.17 Para 35(a) of the NPPF states that local plans should 'as a minimum, seek 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'. This is despite the removal of the 'duty to cooperate' from the NPPF some years ago.

- 2.18 However, TVBC have taken the decision to not seek to address any unmet need from neighbouring LPAs in this version of their new Local Plan (para 3.62):

*'This is a challenging position for the Council as we recognise the increasing pressure from our neighbouring authorities in Southern Test Valley, but individual Local Plans need to progress with evidencing the level of unmet housing need they may have. **As this has not been produced yet by the relevant neighbouring authorities, we are unable to consider this at this time.**'* [Pegasus emphasis added].

- 2.19 Overall then, the Reg 18 Local Plan as currently drafted is almost wholly reliant upon its proposed allocations, including Land east of Ludgershall (Policy NA7), to deliver the minimum 11,000 homes required across the plan period.

- 2.20 This only serves to emphasise the importance of our clients' site in meeting the housing needs of the Borough to 2040.

- 2.21 It is on this basis that the site is strongly supported and it should be retained as a strategic allocation in the next iteration of the TVBC Local Plan.

Summary

- 2.22 South Hampshire has a substantial housing shortfall. There remains a need for TVBC and other South Hampshire LPAs to collectively allocate land for 2,300 dwellings, being the balance of the 12,000-dwelling shortfall which is not addressed by the 'Broad Areas of Search for Growth'.

- 2.23 It is recognised that the Council is capable of meeting its own Standard Method housing needs, and the Council intends to do so by allocating land identified within the PfSH Position Statement for growth and new development.

- 2.24 It is therefore paramount that the Council allocates a sufficient supply of strategic scale sites meet their housing needs. Our client's site represents a draft allocation which is sustainably located and has no significant constraints or barriers to delivery. It has a single owner, it is immediately available and it is capable of accommodating a development which will not have any significant detrimental impacts on designated landscape, ecology or heritage assets, or the amenity of neighbouring properties. It will therefore make an important contribution to future housing supply in the Borough and should be retained in the Regulation 19 version of the TVBC Local Plan.

comprehensively planned.

- 3.7 That said, our client's site (NA7, East of Ludgershall) can and should come forward on its own. In doing so, any new development should give consideration for (rather than being jointly master-planned alongside) the other allocated sites to the south and south-west.
- 3.8 The site benefits from a direct point of access from the A342. It is acknowledged that a coordinated approach to the provision of accesses to sites NA7 and NA8 will be required, through engagement with Hampshire County Council. It is understood that the access junction may take the form of a new roundabout on the A342.
- 3.9 We would emphasise however that highways access to our client's site should come forward on land which is within the ownership of the highways authority and is unfettered of ransom and ownership constraints or network rail control.
- 3.10 Otherwise, as long as suitable pedestrian and cycle links are proposed into Ludgershall and towards the allocation to the south (together with necessary highway improvements / traffic calming / safety measures on A342), there is no requirement for a joint masterplan for sites NA7 and NA8. This is agreed and supported.
- 3.11 The full Policy NA7 text is reproduced from the Reg 18 Stage 2 LP, below:

Northern Area Policy 7 (NA7): Land to the East of Ludgershall

'A strategic housing allocation of approximately 350 dwellings is proposed to the East of Ludgershall on the north side of the A342. Development will need to be guided by a co-ordinated approach to master planning. Development will be permitted subject to:

- a. An appropriate layout reflecting the setting of the North Wessex Downs National Landscape,**
- b. Appropriate mitigation in relation to the Salisbury Plain Special Protection Area (SPA),**
- c. A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking into account flood risk from all sources including surface water flooding,**
- d. Access to the development via the A342 to the south,**
- e. Submission of a noise mitigation strategy in relation to the impact of noise from the A342 to the south, and**
- f. An odour assessment and appropriate mitigation in relation to nearby sources.'**

- 3.12 We support the policy text set out above.

4.0 The Site and Delivery Benefits.

The site

- 4.1 As set out in promotional material to date, the site comprises a 15.8ha field which abuts the eastern edge of Ludgershall at Faberstown.
- 4.2 As the administrative boundary between Test Valley Borough and Wiltshire Councils runs along the western edge of the site, the site falls within – but on the edge of – Test Valley Borough Council’s administrative area.
- 4.3 The south–western boundary of the site adjoins highway land on the northern side of Andover Road (A342). Andover Road provides a direct route to Andover via Weyhill to the south–east (5 miles), Devizes to the west (18 miles) and Marlborough to the north (13 miles). Salisbury is also accessible to the south–west (17 miles).
- 4.4 On this A–road, Ludgershall is served by regular bus services to Andover, Salisbury and Winchester City Centre.

Delivering new homes, including affordable dwellings

- 4.5 There is widely acknowledged to be a Housing Crisis in the United Kingdom. The allocation of this sustainable site for new homes provides an opportunity, at a local level, to make a significant contribution to TVBC’s housing needs.
- 4.6 Draft Policy HOU1 sets out that the new Local Plan will require all new residential development (above 15 or more dwellings) to deliver 40% affordable housing. A mix of homes should be provided to meet local housing need.
- 4.7 A development of this site would intend to deliver 40% affordable dwellings and meet with the draft Local Plan policy requirements set out in Policy HOU1, in full.

Sustainability

- 4.8 Paragraph 4.85 of the draft Local Plan confirms that the site provides *‘an opportunity to deliver strategic sustainable allocations at a sustainable location adjacent to Ludgershall.’*
- 4.9 We agree with this summary and have previously provided evidence to demonstrate that Ludgershall performs favourably when compared to the ‘Tier 2’ settlements set out within the settlement hierarchy in the draft Local Plan. This is on account of Ludgershall’s strong range of services and facilities, coupled with its good public transport connections to larger settlements including Andover, Salisbury, Winchester, Amesbury, Tidworth and Marlborough.
- 4.10 Chapter 3 of the draft Local Plan sets out how the Council has developed a sustainable spatial strategy which underpins many of the policies in the draft Local Plan. Through appropriate and detailed master–planning and collaboration with the Council, HCC and other key stakeholders, the development of site NA7 will assist in the delivery of the

following Local Plan objectives:

- *Reducing our impact on our changing climate and integrating ecological networks and improving biodiversity.*
- *Providing inclusive growth that creates green, safe, and well-designed places.*
- *Supporting new or improved infrastructure which positively responds to its setting, local needs, and our changing climate.*
- *Promoting access to the countryside and conserving and enhancing the Borough's diverse landscape character*
- *Providing developments that promote active travel and invest in infrastructure to enable clean travel that reduces our impact from travel.*
- *Working with our communities and organisations to deliver this.*

Accessibility and Movement

- 4.11 The site presents an opportunity for possible coordinated access design with draft allocation NA8 (south-east of Ludgershall), in collaboration with Hampshire County Council as the Highways Authority.
- 4.12 Other highways and accessibility improvements could include traffic calming measures, a speed limit reduction along an appropriate stretch of the Andover Road, potential signalised crossing points and a cycle / footway along the A342. Connections into Ludgershall can be delivered.

Ecology and Biodiversity

- 4.13 Any new development on the subject site will address the site constraints via an ecological mitigation hierarchy and considered design. Valuable habitats will be strengthened and retained on site, including woodland boundaries. Adequate buffers will be provided where necessary, along with a sensitive scheme of lighting design. Compensatory measures will be designed into the proposals where necessary.
- 4.14 At least 10% BNG will be delivered, in accordance with local and national planning policy.

Flood Risk and Drainage

- 4.15 Paragraph 4.95 acknowledges a small area of surface water flooding on the site.
- 4.16 Surface water runoff from the proposed development will be managed effectively through the implementation of a SuDS-based drainage scheme for the site, in line with LLFA and national requirements.

Summary

- 4.17 Draft Local Plan allocation (Policy NA7) is a sustainable location for new residential development on the eastern edge of Ludgershall. It is a stand-alone development site which can be delivered in the first five years of the Local Plan, making an important contribution to the Council's identified housing needs.

5.0 Infrastructure Delivery Plan.

5.1 Alongside the Reg 18 Draft Local Plan, the Council has published an Infrastructure Delivery Plan (IDP) which forms part of the evidence base of the emerging Local Plan.

5.2 Page 53–56 of the IDP sets out the identified infrastructure required to accompany and enable the delivery of Land east of Ludgershall (NA7) as a strategic allocation for residential development. The identified infrastructure includes (in summary):

- *Site access from the A342;*
- *Connections to the local public transport network (including the Active8 bus route);*
- *Other site-specific improvements to the local highway network as may be required;*
- *The protection and enhancement of the local Public Right of Way network;*
- *Foul drainage infrastructure;*
- *Financial contributions towards primary and secondary school capacity;*
- *Financial contributions towards primary healthcare capacity;*
- *A new community facility and / or contributions to an existing facility;*
- *Appropriate mitigation for the Salisbury Plain Special Protection Area;*
- *Appropriate nitrates mitigation.*

5.3 At this stage, the information set out in the IDP is acknowledged and noted.

6.0 Draft Delivery Timeline.

6.1 Policy NA7 states that this site is expected to deliver approximately 350 dwellings.

6.2 In line with this yield, the following indicative delivery timeline is set out below.

Indicative Delivery Timeline					
2026	2027	2028	2029	2030	2031
45 dwellings	60 dwellings	70 dwellings	70 dwellings	60 dwellings	45 dwellings

7.0 Summary and Conclusions.

- 7.1 These representations to the Test Valley Regulation 18 Stage 2 Local Plan consultation are made on behalf of the Faberstown Trust.
- 7.2 The allocation of 'Land east of Ludgershall' (Policy Northern Area 7) within the Regulation 18 Stage 2 Local Plan is firmly supported.
- 7.3 The proposed allocation represents an opportunity to deliver a well-designed new neighbourhood as a sustainable extension to the settlement of Ludgershall, complementing the additional strategic allocations to the south (Policy NA8) and south-west (Wiltshire Council area).
- 7.4 The site will make a significant contribution to meeting the Council's housing requirement across the plan period.
- 7.5 The site is sustainably located, has no significant constraints or barriers to delivery, has a single owner and is available to come forward immediately, on its own. It is capable of accommodating proposed new development without causing any detrimental impacts to landscape, ecology or heritage assets, or the amenity of neighbouring properties.
- 7.6 There are no overriding technical constraints to development of this site and its future delivery presents the opportunity for significant benefits to existing and new residents in Ludgershall.
- 7.7 We therefore strongly endorse the continued allocation of Land east of Ludgershall (Policy NA7) in the Council's Regulation 19 Local Plan.