

**Enham Park (Land at Manor Farm,
north of Andover)**

Test Valley Draft Local Plan 2040
Regulation 18 Stage 2 Consultation
Response

Bellway Homes
April 2024

tor
&co



Issue / revision	Prepared by	Sophia Goodhed
Reference 234904	Signature	<div></div>
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	Checked by	Jacqueline Mulliner
Comments	Signature	<div></div>
	Date	March 2024
	Authorised by	Jacqueline Mulliner
	Signature	<div></div>
	Date	March 2024
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Contents

1.0 Introduction

2.0 Representation on draft policies

3.0 Conclusion

Appendix 1 Enham Park development location plan

Appendix 2 Illustrative framework masterplan

Appendix 3 Site characteristics plan

Appendix 4 Manor Farm (Enham Park), Andover Vision Brochure

1.0 Introduction

- 1.1 Tor&co has been appointed by Bellway Homes Wessex (Bellway) to respond to the Regulation 18 Stage 2 consultation with respect to the Test Valley Borough Council (TVBC) Draft Local Plan 2040 document (DLP). The DLP is the second stage of the two stage Regulation 18 consultation. It seeks to establish views on a comprehensive draft, including strategic planning priorities and policies as set out in the Regulation 18 Stage 1 document, which have now been further developed. It also seeks views on further evidence and detailed proposals for site allocations and theme-based policies for Test Valley to 2040.
- 1.2 Bellway is actively promoting land at Manor Farm, to the north of Andover (Enham Park) for a sustainable housing-led allocation within the emerging Test Valley Local Plan (indicative development location plan is included at Appendix 1). Andover is one of the borough's two major urban centres, and the site is considered to represent a sustainable and suitable opportunity for future residential development to meet local need, being directly adjacent to the existing settlement boundary, in close proximity to public transport connections and local services, and lacking technical obstacles to its development.
- 1.3 Detailed submissions, promoting the site, have been made to TVBC at each consultation stage to date, including to the Refined Issues and Options consultation (2020), the Green Land Availability Assessment - call for green project sites (2021), and the Regulation 18 Stage 1 consultation (2022). These current Reg 18 Stage 2 representations should be read in conjunction with those earlier submissions, rather than repeating them again here.
- 1.4 The site offers the opportunity to secure sustainable plan-led development, in accordance with the overarching spatial strategy, and to deliver much needed housing across the plan period to help provide resilience for the borough moving forward in terms of its housing land supply position.
- 1.5 Bellway is currently the UK's 4th largest housebuilder, having built and sold 10,945 homes in the financial year 2022/2023 catering for first time buyers through to more seasoned home buyers and their families. Bellway's reputation is built on designing and creating beautiful developments which meet the needs of today and consider the demands of the future.
- 1.6 Bellway's homes are designed, built and marketed by local regional offices managed and staffed by local people. This allows the company to stay close to its customers and take key decisions about design, build, materials, planning and marketing in response to local as opposed to national demands. A simple point, but one which distinguishes Bellway Homes from other house builders.
- 1.7 The National Planning Policy Framework (NPPF) includes a requirement to apply a standard method for calculating Local Housing Need (LHN) as the starting point in identifying the housing requirement unless exceptional circumstances apply. It also requires that needs are met through the application of the presumption in favour of sustainable development. Bellway fully supports TVBC's approach in applying the standard method as a minimum housing requirement. However, the housing affordability issues identified in the evidence base and the considerable level of unmet need from neighbouring authorities, specifically that highlighted in the Statement of Common Ground between the Partnership for South Hampshire (PfSH) authorities, and their Spatial Position

Statement, should be fully considered and accommodated, as part of the housing requirement and associated land allocations, where practical. This is necessary in order for the plan to be sound and in accordance with NPPF paragraph 35.

- 1.8 Whilst making a number of comments on the detail of the DLP, Bellway supports as a matter of principle the proposed strategic allocation of the Land at Manor Farm, north Andover (Enham Park) referenced under policy NA5. In addition, it promotes the extension of the allocation to the north, north east and north west to provide significant wider open space, climate and ecology benefits, also providing an increase in the capacity of the site to deliver at least 900 homes. This would be a sound approach in the context of the overall level of need in the district and across the PfSH area.
- 1.9 Bellway can demonstrate that the whole site, including the extension, represents a suitable site for development and one of the most sustainable locations within the District to help meet the housing requirement (including affordable need), relative to justifiable alternatives, being fully compliant with national policy and the DLP's sustainable distributional strategy.
- 1.10 Allocation of the whole site, located within the north of the district, would help to provide greater flexibility/relief to focus the unmet need from the PfSH area on those sustainable sites that are available in the south of the Borough. Further, it would provide greater resilience in the plan and logically extend the existing settlement edge, providing a comprehensive and rational approach to the development boundaries.
- 1.11 The site is available now and would meet the definition of deliverable in the NPPF. The technical work progressed to date has not identified any fundamental constraints that would prevent the delivery of housing on the site.
- 1.12 This representation responds to TVBC's consultation on the draft policies in the order that they appear in the plan for ease of reference. It also provides an update on the suitability, achievability and deliverability of the draft allocation at Manor Farm, north Andover.
- 1.13 The comments provided are based on the Draft Local Plan 2040 Regulation 18 Stage 2 document, and the 'tests of soundness' prescribed in NPPF paragraph 35.

2.0 Representation on draft policies

- 2.1 The following section presents representations on specific draft strategic policies within the DLP for the Council's review and consideration.

Test Valley Sustainable Spatial Strategy

- 2.2 The DLP sets out that the Test Valley Sustainable Spatial Strategy is focused on the following 3 key elements:
- Maintaining and enhancing a sustainable and attractive Borough
 - Delivering vibrant and resilient towns at Andover, Romsey and other large settlements
 - Sustaining vibrant and healthy rural communities.
- 2.3 As a result, the proposed strategy supports development at the two identified market towns of Andover and Romsey, as the focus for growth, with a wider distribution of development to a larger number of sustainable settlements. The focus is to support an appropriate level of development at the largest range of sustainable settlements where there are key facilities. It is noted that much of the Borough is rural with some villages meeting immediate needs. It is TVBC's intention that the draft strategy will support these rural communities, allowing them to grow in a sustainable manner through enabling rural communities to deliver their own needs and priorities.
- 2.4 The market towns of Andover and Romsey are the largest settlements in the Borough, with the widest range and number of facilities. They are at the core of the spatial strategy and, rightly, will continue to be a focus for development. The DLP outlines that central to this, is the regeneration of the town centres but it is highly relevant that, in order to accommodate the level of housing needed at sustainable locations, there remains a need to release greenfield sites at these two main settlements.
- 2.5 It is clear that the proposed spatial strategy as identified at Regulation 18 Stage 1 remains preferred and Bellway support this in principle as a sustainable approach to development in the borough.
- 2.6 The Spatial Strategy Topic Paper (2024) sets out that following the previous local plan consultation stages the following key conclusions were drawn to inform the proposed spatial strategy:
- There has been continued support for directing growth primarily to the main settlements in providing for local housing need (LHN) and in accordance with the settlement hierarchy. The main settlements including Andover and Romsey are sustainable locations for growth being accessible and well connected to community facilities, infrastructure, employment and public transport.
 - A number of sites have been promoted at the main settlements capable of delivering LHN. On this basis, there is no compelling reason to direct larger scale strategic housing growth to the rural area.
 - In the rural area, smaller scale growth in accordance with the settlement hierarchy is appropriate to support sustaining local facilities in these settlements. Community led development, rural exception sites,

Neighbourhood Plans are considered appropriate mechanisms for delivering housing in the rural area.

- 2.7 Specifically, the Topic Paper sets out four reasonable growth scenarios for northern Test Valley; two growth options which focus housing supply at Andover and Ludgershall and two options that only focus supply around Andover. It states that the preferred growth scenario for northern Test Valley is Scenario 1 (Andover and Ludgershall (1)) which it states performs well in relation to the SA topics, and in comparison to the reasonable alternative growth scenarios. Scenario 1 also performs well in terms of housing delivery and providing for LHN which is positive.
- 2.8 Scenario 1 also appears to perform well in terms of transport, landscape and climate change adaptation. In terms of accessibility to community infrastructure and health, the Topic Paper suggests that Scenario 1 performs marginally less well than scenarios 3 and 4 (Andover focused options 1 and 2), which have a greater Andover focus. That being said, the Topic Paper sets out that growth adjacent to the market town of Ludgershall has good accessibility to a range of infrastructure and facilities. Bellway note that Ludgershall is also a focus for growth in the emerging Wiltshire Local Plan and will facilitate a new road access to the town from the east, which is still being co-ordinated with neighbouring local authorities (such as TVBC).
- 2.9 The emerging Wiltshire Local Plan also states that any future need to further expand the town into Test Valley will be the subject of review in future development plans, which indicates the proposed allocations in the TVBC DLP have not yet been fully considered or accounted for. Further, it is noted that Ludgershall had a population of 5,390 according to the 2021 census. The Wiltshire and TVBC proposed allocations could add another circa 6,500 occupants and raises concern over whether this can be classed as sustainable growth in a location that is relatively remote and in a town that lacks rail links.
- 2.10 More fundamentally, paragraph 4.103 of the Test Valley DLP indicates that both the Wiltshire south east Empress Way site and the TVBC south east of Ludgershall site require a road bridge over a railway used by the Ministry of Defence (MoD), which is a significant piece of infrastructure requiring further discussions between Hampshire County Council, Network Rail and Wiltshire Council (and presumably the MOD).
- 2.11 In terms of the points raised above and with regards to the preferred growth scenario, Bellway would question whether Scenario 1 with significant development at Ludgershall (specifically 1,500 homes across two sites), and which is located across the boundary in Wiltshire, is the most reasonable and sustainable option given the current uncertainty around significant infrastructure delivery. The allocations cannot be relied upon unless there is clear evidence that such a project is deliverable and viable.

Further, scenarios 3 and 4 appear to perform better in terms of accessibility to community infrastructure and health. They also have a greater focus on Andover, in line with TVBC's strategy to focus development at the largest and most sustainable settlements. Given that the DLP highlights that the two towns of Andover and Romsey are the focus for development, with some wider distribution of development to other sustainable settlements, it is notable that the growth scenarios chosen in both the northern and southern market areas have the largest site allocations adjacent to the town of Ludgershall (Wiltshire)

and the Tier 2 Valley Park, with the former being located outside of the borough and as a result, outside of the TVBC settlement hierarchy.

- 2.12 In this context, such an approach would be contrary to the DLP's strategy and focus for growth. Provided sustainable, deliverable and suitable sites are available within the borough, such as at Manor Farm, north Andover (Enham Park), growth should be focussed and maximised where possible towards the main settlements, where the greatest range of services, jobs and infrastructure are present. Housing provision should also be tied to employment as much as possible to avoid increases in unnecessary commuting leading to increased impacts upon the highway network. As the Settlement Hierarchy Assessment (2024) states in reference to Andover and Romsey, *'there are no other settlements within the Borough which offer such a complete range of facilities, with good access to jobs, key services and infrastructure'*.
- 2.13 Additionally, in table 2 of the Spatial Strategy Topic Paper, Land at Manor Farm should be included within the 'Constant Site Options' rather than the 'Variable Site Options' as the site is included in all 4 growth scenarios set out and are only variable with regard to the total housing number assessed, which should be made clear.
- 2.14 Bellway also considers that some growth within rural villages is sensible, where it can support the ongoing sustainability and service provision of these settlements, and if such viable and sustainable locations are identified. However, it is not considered that this approach will deliver the housing numbers required. As such Bellway supports the plan's overarching spatial strategy to seek to identify and focus development at the most appropriate and largest sustainable settlements.
- 2.15 Bellway does not consider it would be appropriate to rely on the delivery of rural site housing requirements that have not been identified in this DLP. As set out further in the response to Spatial Strategic Policy 4 below, rural sites should be identified (through consultation with local communities) to ensure the housing requirements are deliverable and the plan can be found sound, being effective and justified in accordance with paragraphs 23 and 69 of the NPPF.
- 2.16 Overall, Bellway considers that maximising opportunities for housing growth at the key towns as a first priority, in sustainable locations in close proximity to the town centres, will be vital to generate further critical mass to support the town centre in terms of its retail, employment and leisure offers going forward. The whole site at Manor Farm (Enham Park) would provide further critical mass, whilst being sustainably located.

Spatial Strategy Policy 1 (SS1): Settlement Hierarchy

- 2.17 The draft policy rightly continues to outline that the towns of Andover and Romsey stand out as being the most sustainable, each with a full range and number of services and a high level of accessibility by public transport. Bellway agree that these towns play a key role in supporting the needs of the wider population in Test Valley and potentially beyond the Borough reflecting the high level of services available. For those reasons the TVBC methodology for categorising settlements appropriately places the two towns in tier 1 of the settlement hierarchy.

- 2.18 With regard to settlement boundaries outlined in the Northern and Southern policies map, Bellway considers that they should be updated to reflect sites with existing planning permission (not only commenced permissions) and new draft allocations. Failure to include allocations, in which most are located outside of existing settlement boundaries, would lead to the spatial strategy effectively being out of date at adoption, particularly as it is not clear whether the sites are not restricted by 'countryside' (outside of settlement boundary) policies, such as Policy SS2 (Development in the Countryside).
- 2.19 The Settlement Boundary Review (2024) consultation document confirms that the proposed approach draws around existing identifiable boundaries on the ground such as buildings and appropriate curtilages (that relate better to the built form of the settlement than the countryside), rather than more loosely around the edge of the built-up area. However, the very nature of the edges of settlements is that defining via physical edges is not necessarily clear, and can often exclude spaces that are widely considered part of the built-up area.
- 2.20 Bellway believes that there is a need to ensure flexibility is incorporated into the emerging plan to provide adaptability and the opportunity to respond to change, as per NPPF paragraph 11. The policy approach should not be tied to a physically defined boundary, but allow for flexibility and future changes in the nature of edge of settlements through the duration of the plan period. This is reflected in NPPF paragraph 74 which highlights that *"the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed and supported by the necessary infrastructure and facilities."*
- 2.21 Allowing for flexibility and adaptability is key, therefore Bellway consider that a looser approach to defining edge of settlements should be employed, to avoid land that is clearly part of the built-up area being excluded.
- 2.22 As set out in their Regulation 18 Stage 1 response, Bellway considers that it would be logical to apply different approaches to settlement boundaries based on the scale and nature of the settlements in question. For the major centres and growth areas (Andover and Romsey) including proposed site allocations, it would be sensible to adopt a more flexible and looser approach to allow for flexibility and adaptability to changing circumstances over the plan period, including opportunities for limited growth beyond infill and re-development.
- 2.23 In rural areas, where some growth in sustainable locations may be appropriate, it would be sensible to apply more rigid and defined settlement boundaries in order to ensure greater control against unregulated and harmful growth, in more sensitive locations.

Spatial Strategy Policy 2 (SS2): Development in the Countryside

- 2.24 As mentioned in the response to Policy SS1 above, draft site allocations should be included within the proposed settlement boundaries, unless it is clear that they are referred to in Policy SS2 as not being restricted. Currently most of the draft site allocations are located outside of settlement boundaries and would therefore be restricted by this countryside policy, which would be neither effective or consistent with national policy in accordance with Paragraph 35 of the NPPF.

- 2.25 Without either changing the settlement boundaries to include the new site allocations or referring to them as being exempt from Policy SS2 restrictions, the spatial strategy will effectively be out of date at adoption and the DLP could prevent sustainable allocated sites from coming forward for development.
- 2.26 Bellway considers that there is a need to ensure flexibility is incorporated into the policy wording to provide adaptability and the opportunity to respond to change, as per NPPF paragraph 11. The policy approach should not be restricted to land within settlement boundaries (particularly as these are only proposed for Settlement Tiers 1-3), but allow for flexibility and future changes in the nature of edge of settlements through the duration of the plan period, including in response to any arising land supply shortfalls. A policy plan-led approach which supports the release of land for housing development adjacent to settlement boundaries, in certain circumstances (such as a land supply shortfall) would be justified and effective.
- 2.27 Further, notwithstanding the draft policy references for rural development exceptions, the policy should ensure it includes all the circumstances set out in paragraph 84 of the NPPF in order that it is consistent with national policy.

Spatial Strategy Policy 3 (SS3): Housing Requirement

- 2.28 Bellway supports TVBC's proposed housing requirement for the Borough as a minimum of 11,000 homes (550 dpa) to be delivered over the plan period of 2020 to 2040, which aligns with the latest local housing need as calculated by the government's standard method and TVBC's Housing Topic Paper (2024).
- 2.29 The figure is higher than that set out in the Strategic Housing Market Assessment (SHMA) (2022) which was 541 dpa at that time. However, data on demographic changes and affordability ratios has subsequently been updated by Government since the Regulation 18 Stage 1 consultation. This has resulted in an updated local housing need figure which has increased slightly to 550 homes per year. Bellway appreciate that the Government will publish further data which will need to be considered, however the SHMA is now out of date and should be revised in preparation for the next Regulation 19 stage consultation.
- 2.30 The housing requirement remains split between the Northern and Southern Test Valley Housing Market Areas as identified in the policy and at Table 3.1 of the DLP. For the purposes of housing land supply, each Housing Market Area (HMA) has its own supply position. In this case, the minimum housing requirement set out for Southern Test Valley is 4,730 and 6,270 for Northern Test Valley. It is however noted that whilst the Southern and Northern HMA totals tally correctly to reach the borough wide total of 11,000 homes, the homes per annum for each of the HMAs do not quite add to their respective totals. For instance it appears that the Northern HMA total calculates to 6,260 homes and the Southern to 4,740 homes. This should be reviewed for accuracy and amended as required throughout the DLP and the evidence base.
- 2.31 Bellway supports the use of the government's standard method for determining housing need which represents a sound basis and starting point. It should be highlighted that the standard methodology is also based on backward looking trend data. As such it does not look forward, and it has been known for historic trends to underestimate growth. Bellway therefore agree that the standard method should represent the minimum requirement from which local

circumstances and aspirations should apply (NPPF paragraph 61). Having said this, it does not seem logical, positive or effective, to progress a plan that requires a lower level of housing provision than current policy requirements (588 dpa).

- 2.32 Moreover, paragraph 61 of the NPPF also states that in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for. Therefore, in establishing the housing need, it will be essential for TVBC to consider the relationship with surrounding local authorities and settlements through the Duty to Cooperate (DTC) and wider unmet need. Whilst the Northern Test Valley Housing Market Area (HMA) is not located within the PfSH area, part of the Southern Test Valley HMA is. Meeting unmet need from PfSH in the southern part of the borough will direct growth necessary to meet Test Valley need towards the north of the borough. This knock-on effect, increases the need to identify additional housing, including at Andover.
- 2.33 It is also important to note that there are housing affordability issues identified in the borough (SHMA 2022), and a further uplift in the requirement may be appropriate to better address this need.
- 2.34 Given the above, TVBC's housing need should look to respond to the context of low affordability and the housing delivery challenges of neighbouring authorities and ensure the level of housing requirement must be set at an absolute minimum, with flexibility provided through site allocations over and above the requirement.
- 2.35 With regard to unmet need in neighbouring authorities, the Partnership for South Hampshire (PfSH) published an updated Spatial Position Statement (to replace the 2016 Statement) in December 2023 which sets out that the current level of unmet need is some 11,771 dwellings up to 2036 and continues to demonstrate a significant shortfall in the sub region. The statement also proposes that Test Valley should be able to meet and potentially exceed the standard method to help with unmet need. Further, it identifies locations as broad areas of search for sustainable strategic-scale development to potentially deliver a combined total of approximately 9,700 homes, making a significant contribution to the shortfall in housing provision in South Hampshire. It is advised that the suitability and deliverability of these areas are to be considered in the relevant Local Plans. The relevant broad areas for Test Valley are:
- East of Romsey; and
 - South-west of Chandler's Ford.
- 2.36 Whilst there are draft allocations proposed in these broad areas within the DLP, it is not clear as to whether these have been explored fully in the context of the Statement's proposed broad areas of development.
- 2.37 Further, paragraph 3.59 of the DLP states that there is currently no clear evidence of the level of unmet need in neighbouring local authority areas to be able to consider it at this time, due to the slow progress of plan making in neighbouring authorities where potential unmet need is still not known. This statement is contrary to the latest evidence published by PfSH and TVBC's Duty to Cooperate Topic Paper (2024), which sets out a formal commitment sought from Havant Borough Council to meet 2,000 homes in Test Valley. It is also noted that the Topic Paper only appears to consider housing need in south

Hampshire in Table 1, with no mention of discussions with other neighbouring authorities such as Wiltshire, Basingstoke and Deane and West Berkshire on their unmet need. Any unmet need in these neighbouring authorities outside of the south Hampshire area should also be explored and confirmation set out in the Topic Paper to clarify.

- 2.38 In addition to unmet need, there is also growing housing pressures within south Hampshire, including the increasing environmental constraints, and challenges that will likely come forward over the plan period to consider. For instance, The housing delivery challenges within the New Forest authorities has already been identified, indeed despite the relatively recent adoption of the plan, based on a capped housing requirement, and stepped housing trajectory, there is already a housing land supply shortfall in New Forest District. In addition, the unmet need and environmental implications of managing growth and development in south Hampshire and beyond are becoming more pressing. The latter is evidenced by the issues relating to Nitrogen and Phosphorus loading upon the Solent, River Itchen and River Avon nature conservation designations. Whilst solutions are being explored, including the recent government announcement requiring water companies to upgrade qualifying wastewater treatment works by 1 April 2030, this issue will clearly continue to effectively frustrate the delivery of housing in the meantime, where multiple neighbouring authorities are affected.
- 2.39 As a result, Bellway consider that the current DLP is not positively prepared or consistent with national policy as it does not sufficiently address the DTC, what is proposed (especially within the PfSH Spatial Position Statement) and how this impacts upon the emerging plan and growth requirements. It will be important that these needs are considered through this local plan, in accordance with paragraph 61-022 of the Planning Practice Guidance (PPG) and not be delayed or rely on it being addressed in a future local plan review.
- 2.40 Currently the Duty to Cooperate is still a legal requirement, and we understand will remain a requirement until the new plan-making process is brought into effect summer 2025. In any event, even under an alternative 'alignment' policy meeting unmet need is likely to remain a key objective. As such it will be important for TVBC to consider how it could increase its own housing requirement and supply to take account of the challenges affecting neighbouring LPA's and address some of these unmet needs, otherwise there is a risk that the plan will not be considered to be legally compliant or positively prepared.
- 2.41 In order to address the affordability issue identified by the evidence base and the additional unmet need of the sub region, TVBC should ensure that draft allocated sites make efficient use of land, boosting the supply of both market and affordable homes in accordance with paragraph 128 of the NPPF. In this context, allocating additional housing numbers at Manor Farm (Enham Park), north of Andover would be justified and an appropriate response to help address the issue.

Spatial Strategy Policy 4 (SS4): Rural Housing Requirement

- 2.42 Bellway note that the rural housing requirement for the borough is 542 homes, split between the Northern HMA with 260 homes and the Southern HMA with 282 homes. The rural housing requirement forms part of the minimum housing requirements for the respective housing market areas.

- 2.43 Bellway would highlight that this rural requirement accounts for a housing supply of 542 dwellings (5% of the borough requirement) which is not allocated or identified and is therefore currently undeliverable. The supporting policy text proposes that these will be identified and delivered by local communities. Bellway do not disagree with the principle and support TVBC accommodating opportunities for community-led development, for instance where it accords with paragraphs 70 and 73 of the NPPF. However, if they are not identified then this should be separate to and not form part of the minimum housing requirement, as it is not an insignificant proportion of the supply. It is noted that TVBC draft policy HOU2 already addresses community led development in this way.
- 2.44 Rural site requirements that are included within the minimum housing requirement should be identified in this DLP (through consultation with local communities) to ensure the housing requirements can be met and the plan can be found sound, being effective and justified in accordance with paragraphs 23 and 69 of the NPPF. These stipulate that strategic policies should either identify or allocate a sufficient supply and mix of sites to deliver the strategic priorities of the area, taking into account their availability, suitability and likely economic viability.

Policy 6 (SS6): Meeting the Housing Requirement

- 2.45 Bellway strongly support TVBC's provision for a minimum 10% supply in housing above the minimum housing requirement, which will help provide a sufficient supply of homes and maintain a resilient housing land supply across the plan period.
- 2.46 It is noted that the policy text sets out that the Northern and Southern Test Valley minimum housing requirement is being met through housing completions, commitments, strategic allocations and the rural housing requirement. For clarity, this statement should be amended to include that the housing requirement is also being met through neighbourhood plan requirements.
- 2.47 Table 3.3 sets out the housing requirement and supply and it is noted that the total borough wide supply of 12,415 homes does not include the rural area requirement figure (542 homes) as set out in the table. This would make the borough wide total 12,957 homes instead. This issue also appears to be the same for the split Southern and Northern Test Valley total housing supply figures, where the rural housing requirement figure is again not included. The table should therefore be reviewed and amended accordingly to ensure it is calculated accurately.
- 2.48 With regard to the total Neighbourhood Plan Housing Requirements for Southern Test Valley, the table sets out a requirement for 70 homes. There is however a note attached to this to say that "*There is permission for 18 dwellings for one site that forms part of the Neighbourhood Plan housing requirement for King's Somborne that is accounted for within this total.*" It is not clear whether the 18 dwellings permitted has been double counted within the existing housing commitment figure, which also includes sites that have planning permission. This should be checked and clarified to ensure the housing requirement and supply has been calculated accurately and is justified.
- 2.49 Finally, it is noted that the total windfall allowance of unidentified developments from small sites anticipated to come forward is 818 homes over the plan period.

The Housing Topic Paper (2024) sets out the average annual housing completions on windfall sites in the last 10 years as 30.2 dwellings for Northern Test Valley and 37.6 dwellings for Southern Test Valley. However, it is not clear why the latest Housing Trajectory (2024) sets out a different and lower proposed annual windfall allowance for both HMAs (at 29 dwellings and 22 dwellings respectively). Justification for the anticipated annual windfall allowances should be clearly set out within the evidence base.

Northern Area Policy 5 (NA5): Land at Manor Farm, North Andover

- 2.50 Bellway strongly supports the allocation of this land to deliver housing-led mixed use development in one of the most suitable and sustainable locations that is available now and therefore able to contribute towards the council's five-year housing land supply. The allocation is in accordance with the overarching priorities for Northern Test Valley which support the regeneration of Andover Town Centre, focus sustainable growth at Andover and at other larger settlements, and to support the existing strong and diverse economy.
- 2.51 There are no technical constraints to delivering the development allocated. However, in the context of housing need, the benefits of flexibility and in pursuit of comprehensive masterplanning, it is imperative to recognise that the land within Bellway's control can deliver a greater number of homes (at least 900 dwellings) than that which is allocated in the plan, including incorporation of additional land to the north, north west and north east. This would help to provide much wider benefits for the community in terms of placemaking and local facilities including recreational and play facilities, biodiversity, renewable energy and climate change benefits. A key element would be the extension of the open space as a country park further north east up to Hungerford Lane and north of Knights Enham. This would act as a buffer, providing a defensible boundary and transition to the surrounding countryside remaining undeveloped in accordance with countryside and local gap policies.
- 2.52 Further, it would help extend the public rights of way network to include additional links to better connect the countryside with the wider area and existing settlements, and provide better opportunities to link the site with publicly accessible green spaces in the local area such as Andover Diamond Wood and Harmony Wood, in accordance with draft policy HE3 (Access to the Countryside).
- 2.53 The extension of land to the north, north west and north east would help deliver the above mentioned wider benefits, as well as incorporate some flexibility to make best and most efficient use of the draft allocated site to further help meet housing needs (including potential for specialist housing) and provide additional resilience to the plan. It would assist in achieving a better quality scheme, with an appropriate density transition from more urban to rural settings further north, that could deliver wider objectives (such as biodiversity net gain, nutrient neutrality, health and well-being and carbon reduction) yet be compatible with countryside policies.
- 2.54 Increasing the capacity of the site would also help the council meet increased housing numbers, addressing the affordability issue identified by the evidence base and the additional unmet need of the sub region, issues raised in the response to Spatial Strategy Policy 3. A development location plan, updated illustrative framework masterplan and an 'Enham Park, Andover' Vision Brochure is appended to this response identifying the land that it is proposed

should be incorporated within the allocation and the concept drawing Fig. 4.5 of the Local Plan be amended accordingly.

- 2.55 The additional areas of the site mentioned above and the resultant increase in benefits would contribute to many of TVBC's key objectives, better addressing the following:
- The potential land for renewable energy / micro generation would help increase energy efficiency and help tackle climate change through transition to a carbon neutral future, ensuring new development is adaptable and resilient to the changing climate.
 - Additional land for open space, recreational and green infrastructure would further assist in delivering and strengthening a sustainable, cohesive and healthy community that secures lasting benefits for all.
 - The wider land for open space, recreational and green infrastructure would also better help to conserve and enhance biodiversity on a larger scale, promoting and securing clear and measurable improvements to habitats and biodiversity. It would also enhance the connectivity, quantity and quality of ecological and green infrastructure networks.
 - The wider proposals would encourage active lifestyles and enhance health and wellbeing, by providing opportunities for recreational, and community activities, through the provision of larger accessible open spaces, increased access to the countryside, sports and leisure.
 - Finally, the additional areas would deliver safe, connected, attractive, integrated and well-designed environments that take account of and respond positively to local context and character and better promote the 20-minute neighbourhood principles. The larger area of country park and recreational facilities would strengthen the sense of belonging and identity helping to strengthen connections between people and place at the development and with surrounding settlements.
- 2.56 Overall, the inclusion of these additional areas within allocation NA5 would allow for more flexibility in the design and layout of the residential parcels and green infrastructure, and create greater opportunities for access to the countryside, sport and recreational facilities, sustainable energy generation and biodiversity and connectivity benefits, in accordance with paragraphs 8 and 11 of the NPPF, as well as the key strategic priorities of TVBC's Corporate Plan 2023 – 2027 and Climate Emergency Action Plan (2020). It would also provide flexibility to help ensure the development can accommodate and address other policy requirements in accordance with Policy BO1, with further enhancement of biodiversity, Policy BO2 in addressing and being able to achieve nutrient neutrality, and policies BIO4, HE1 and HE3 with significant provision of and improvements to green infrastructure and open space and recreation.
- 2.57 At present there is an arbitrary line that sub-divides two of the fields on the north edge of the site boundary. While Bellway are not seeking to locate housing at the northern extent of the site, it will be beneficial to incorporate countryside compatible uses that will help to achieve their wider quality, placemaking and biodiversity objectives. In this case, some flexibility in progressing and finalising the site boundaries will be needed to accommodate a more appropriate and deliverable allocation and to ensure it is justified and effective.

- 2.58 Bellway note that criteria c) of the draft policy wording and associated map includes an indicative heritage buffer area (identified as the pink dotted land west of Knights Enham). The site has been subject to previous detailed heritage assessment work, including the preparation of a Built Heritage Assessment (RPS; April 2022), which was submitted with Bellway's representation to the Regulation 18 Stage 1 consultation. This demonstrated that, subject to an appropriate landscaping scheme and provision of mitigation measures, the site is deliverable in heritage terms and that any potential adverse heritage impacts can be either minimised or avoided.
- 2.59 The Heritage Assessment and vision document previously submitted also assessed a wider landholding to the north and north-east of the current proposed allocation. This included land north of Knights Enham and east of Newbury Road. This illustrated that, while the land immediately north and west of Knights Enham and within the setting of Manor Farmhouse, is of higher sensitivity and should be retained as open space, the land to the east of this (beyond Hungerford Lane) is of limited sensitivity in heritage terms and would be appropriate for development.
- 2.60 Whilst Bellway appreciate that the proposed heritage buffer is indicative at this stage and that the requirement is for 'an appropriate buffer' to be incorporated, it should be noted that the previously submitted Vision Document and appended Vision Brochure has illustrated that the site, which accommodated a smaller heritage buffer than the indicative buffer shown in the policy, is deliverable. It demonstrated that any heritage impacts can be minimised through the design and assessment process, as part of a future planning application, which will include the preparation of a Heritage Impact Assessment and site-specific design measures to ensure appropriate landscaping buffers and high-quality design, in accordance with criteria b) of the policy.
- 2.61 Bellway acknowledge that the indicative heritage, crematorium and green space buffers are needed to minimise impacts, however these should not be presented as rigid buffers at this stage. The indictive buffer zones could instead be shown as light shaded / hatched areas without a fixed boundary line. This will ensure sufficient flexibility so that they can be adjusted as required, subject to further evidence and justification.
- 2.62 The key policy text states that the allocation can provide approximately 800 dwellings. However, the design work undertaken to date on the current proposed allocation has shown the site can accommodate at least 900 dwellings. This circa 900 home capacity is also set out within the different growth scenarios for the site in TVBC's Housing Topic Paper (2024). Further, paragraph 5.128 of the Interim Sustainability Appraisal (2024) (SA) goes on to identify that Manor Farm has housing potential of approximately 800-900 dwellings. Indeed, in relation to the majority of SA topic areas, it would seem unlikely that the 900 would result in a significantly different conclusion to the sustainability of the growth scenario.
- 2.63 It is also noted at paragraph 5.126 of the Interim SA that Land at Manor Farm is identified as a 'variable' site option because, in the event of lower housing delivery at sites such as 'Land at Bere Hill Farm', there is some additional potential at Manor Farm in the region of an additional 100 dwellings (subject to master planning and site assessments). It appears The scoring applied in Appendix IV of the SA appears to have been applied correctly. The main constraint areas for the Bere Hill Farm site appear to be access, the impact of

road noise from the A303, landscape and heritage. It is also noted that the access options are dependent on third party land and adjoining sites coming forward, therefore there is uncertainty in deliverability.

- 2.64 The design work for the Manor Farm site has shown that over 900 dwellings can be accommodated at an appropriate density for the site, where residential parcels are carefully integrated into their surroundings creating a gradual and harmonious transition from more urban to rural settings further north. In this case, and given the above SA support for 900 homes on site and potential uncertainty in the capacity and deliverability of homes on other allocated sites, Bellway consider there is no reason to delay and that the policy text should be amended now to state a capacity of 'at least 900 dwellings' in order to make best and efficient use of the land available.
- 2.65 Finally, whilst Bellway have already put forward a 1.1ha local centre that combined employment floorspace in their Regulation 18 Stage 1 response, it is noted that a separate requirement for approximately 1.5ha of employment space is included within the policy text. However, given that there is no specific justification for the provision of approximately 1.5ha of employment floorspace within the evidence base, Bellway consider that the requirement should be reduced to state at least 1ha of employment space at this stage. It should also be set out as an indicative figure, to ensure flexibility in case of changes in market demand for small-scale employment land and so that the allocation is justified and deliverable.
- 2.66 It is proposed that draft Northern Area policy 5 (NA5) be amended accordingly:

'Northern Area Policy 5 (NA5):

Land at Manor Farm, North Andover

A strategic, mixed-use allocation of ~~approximately 8~~ at least 900 dwellings and at least 1.50 ha of employment allocation space is proposed north of Saxon Way at Manor Farm in Andover. Development will be permitted subject to:

- a. Provision of a significant area of high quality and accessible Green Space to the north of the site,**
- b. Submission of a Heritage Impact Assessment to demonstrate how the layout and design of the development will respond sensitively to the significance of nearby heritage assets in Knights Enham,**
- c. An appropriate buffer along the east of the site adjacent to Knights Enham,**
- d. An appropriate buffer along the western edge of the site adjacent to the Charlton Crematorium,**
- e. 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,**
- f. Access to the development via Saxon Way, ~~and~~**

- g. The enhancement of the existing public rights of ways, and
- h. A design approach that includes lower density in the northern part of the development zone'.

Policy CL1: Countering Climate Change

- 2.67 Bellway support in principle the delivery of a net zero carbon future and addressing the impacts of our changing climate through both mitigation and adaptation. Climate change is one of the defining challenges of our time. Bellway are committed to reducing their own emissions through the setting of Science-Based Targets (SBTs) and will play a full and active role within the industry to drive innovation around carbon reduction.
- 2.68 As briefly mentioned above in response to Northern Area Policy 5, a flexible allocation including land currently on the northern fringes of the NA5 site would provide better scope to deliver wider opportunities to conserve and enhance resilient ecological networks and green infrastructure networks, delivery of biodiversity net gain and nature-based solutions for instance.

Policy CL2: Flood Risk

- 2.69 Part d) of the policy sets out that development will be permitted provided that any residual risk can be safely managed, however it is unclear what this may relate to specifically. Clarification on this part of the policy should be set out in accordance with paragraph 16 of the NPPF, which requires policies to be clearly written and unambiguous.
- 2.70 Similarly, part i) sets out that sustainable drainage systems should be designed in accordance with the latest policy and guidance and meet the relevant standards. It is assumed that it refers to national policy and guidance, however it is currently unclear and should be clarified along with which relevant standards apply, otherwise applicants are not able to calculate whether the requirement has an impact on a scheme's viability.
- 2.71 To take into account a variety of site characteristics and ensure the policy is sufficiently flexible and thus effective, it is suggested that the wording of part j) be amended to: *'Priority is given to natural flood management and drainage approaches wherever feasible'.*
- 2.72 With regard to part k), as delivery and implementation arrangements might not yet be formally secured at the stage an application is submitted, the wording should be amended to the following to ensure adequate flexibility: *'Details for future maintenance to ensure acceptable standards of operation over the lifetime of the development shall be included within the proposal and how the delivery and implementation of such arrangements are likely to be secured'.*

Policy CL3: Sustainable Buildings and Energy Use

- 2.73 The DLP consultation document places a significant emphasis on delivering a fully sustainable plan from an environmental perspective, addressing the impact of climate change and delivering a net zero carbon future through appropriate mitigation and adaptation to compensate against the required growth.

- 2.74 This policy introduces specific requirements for new buildings in relation to sustainable design and construction expectations to ensure that new development is brought forward in a way that contributes to the need to mitigate and adapt to climate change.
- 2.75 At a company level Bellway is committed to ensure the business plays its role in delivering carbon reductions and planning for a sustainable future. Through collaboration and test trials, Bellway is working on a variety of technologies to help reduce carbon emissions from their homes. This includes working with Salford University on the Energy House 2.0 project testing new technology and Future Homes Standard (FHS) conditions with real occupants.
- 2.76 Bellway is committed to tackling climate change and as set out in their Regulation 18 Stage 1 response in 2022, supports the promotion of low carbon ways of living including the broad development measures in Policy CL1. Bellway are also supportive of the transition away from gas boilers and the fabric standard outlined in the FHS consultation. They are committed to the FHS, however they are not supportive of meeting standards that exceed the FHS / Part L1 2025.
- 2.77 Bellway is concerned that the policy requirements for new homes including the energy, carbon and renewable generation standards proposed in draft Policy CL3 goes above and beyond where the Future Homes Standard is taking the industry and could prevent sustainable sites from coming forward for development. It should be noted that the planning system does not need to include additional policies for related technical standards, as it is being dealt with by Government and as mentioned, through the FHS and building regulations. It is clear that the Government's intention is to use building regulations as the focus for the national standard on this matter, given that paragraph 159b of the NPPF states in relation to greenhouse gas emissions that "... any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards".
- 2.78 Further, the Written Ministerial Statement (Planning - Local Energy Efficiency Standards Update) by Lee Rowley (Minister of State for Housing) made on 13 December 2023 clarifies how this matter should be addressed and clearly sets out that "*the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations*". The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. The statement also sets out that any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures that development remains viable, and the impact on housing supply and affordability is considered in accordance with the NPPF.
- 2.79 It is further noted from the Written Ministerial Statement that any increase on Part L required by local authorities should be expressed as a percentage uplift to the Target Emission Rate, which is not the case in draft Policy CL3.
- 2.80 Embodied carbon, the carbon emissions generated from the production and transportation of building materials, construction process and maintenance of a building is currently beyond the scope of the building regulations. The government is proposing to take steps to address this factor and intends to

consult on its approach to measuring and reducing embodied carbon in new buildings in due course. Bellway recognise and support the need for development to reduce its carbon emissions, however, rather than placing additional requirements that are considered unnecessary and unjustified, it is considered that the most effective way of achieving this is through strict adherence to building regulations as they are updated.

- 2.81 Bellway appreciates that local plans are future facing due to their timeframes. It is therefore suggested that draft Policy CL3 be re-worded to allow for potential change in Government policy over time (or will be subject to future local plan review) but that in the interim current expectations are aligned to the FHS and Written Ministerial Statement and include flexibility and viability considerations in order that it does not hinder the development of suitable sites.
- 2.82 One of the key ways to address climate change is through the identification of sustainable housing sites that are well located to key settlements and major centres, employment, services and infrastructure. The land under Bellway's control at Manor Farm (Enham Park) is such a location. Ultimately there is value in identifying greenfield, larger scale allocations like Manor Farm because of its capacity to not only mitigate its own development impacts, but also offer wider benefits that are less likely to be delivered through infill or physically constrained urban development.
- 2.83 Beyond the clear advantages of Manor Farm, in terms of its sustainable location, Bellway are committed to ensuring that the development at the site would be energy efficient, incorporating other energy generating and saving technologies where feasible and as appropriate. In addition Bellway intends, given flexibility in the allocation land area, to explore a micro-grid approach to energy generation with battery storage to optimise the equality of renewable distribution to the proposed development and minimise local grid capacity change. That commitment alongside future building regulations improvements will enable measurable carbon reduction to be achieved. Further, the proposed country park with large, proposed areas of open / amenity space and green wildlife corridors running through the site would help to enhance coherent and resilient ecological networks, green, and green-blue infrastructure networks, while delivering net gains for biodiversity.

Policy CL4: Water Use and Management

- 2.84 As per comments raised in respect of Policy CL3, Bellway would highlight that in regard to policies on climate change and water efficiency, the planning system does not need to include additional policies for related technical standards, as it is being dealt with by Government through the Future Homes Standard and building regulations. It is clear that the Government's intention is to use building regulations as the focus for the national standard on this matter, given that paragraph 154b of the NPPF states in relation to greenhouse gas emissions that "*... any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards*".
- 2.85 All new homes already have to meet the mandatory national standard set out in the Building Regulations (of 125 litres/person/day). Where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day. It is acknowledged in the supporting text that the Borough lies within an area classed to be seriously water stressed by the Environment

Agency which could justify the tighter optional standard in this case. However, the policy has set out a requirement that goes below this at 100 litres/person/day.

- 2.86 Bellway recognise and support the need for development to reduce its water consumption, however, rather than placing additional requirements that are considered unnecessary and unjustified, it is considered that the most effective way of achieving this is through building regulations. The policy should be amended to refer to 110 litres per person per day, or just refer to compliance with building regulation part G2 and any updates superseding it to provide flexibility for national standards evolving overtime.
- 2.87 The policy also sets out an infrastructure requirement to demonstrate adequate water supply, surface water drainage and waste water treatment capacity will be available prior to occupation. Water supply and waste treatment is a strategic local plan issue, as individual land owners / developers will not be able to address that issue the current requirement is inappropriate. In accordance with NPPF paragraphs 25-27, TVBC should be collaborating with water companies and adjacent strategic policy makers to plan for the level of growth in the plan period and ensure adequate water supply and waste treatment i.e through delivery of additional infrastructure, reservoirs or pipelines.

Policy ENV7: Amenity

- 2.88 To ensure part a) of the policy is clear and effective and does not place unnecessary burden on new developments to provide for neighbour amenities that are not relevant, the wording should include the following: *'It provides for the privacy and amenity of its occupants and does not have an unacceptable impact upon those of neighbouring properties;*'.

Policy BIO1: Conservation and Enhancement of Biodiversity and Geological Interest

- 2.89 To ensure the policy is sufficiently flexible and effective for where it is relevant, the wording should be amended to: *'All development shall ensure the conservation, enhancement and restoration of biodiversity and geology, avoiding any adverse impacts on condition, and where relevant recovery, of all types of nature conservation sites, habitats, species and components of ecological networks or geological interests where possible.'*
- 2.90 Further, part vii should be clarified and specific to the types of habitat that are relevant. In this case, the wording should refer to *'Important trees, woodland and hedgerows; and'*.
- 2.91 Bellway would also highlight that the inclusion of the additional areas proposed within the Manor Farm allocation (NA5) as set out in response to Northern Area Policy 5 above, would allow for more flexibility in the design and layout to accommodate further enhancements in green infrastructure and biodiversity in accordance with this policy.

Policy BIO2: International Nature Conservation Designations

- 2.92 The Manor Farm (Enham Park) proposals avoids direct effects on such designations and would be designed to mitigate alone or in-combination effects through on site mitigation measures or if there are residual effects a

combination of on-site and off-site measures. Flexibility in the allocation land area as discussed in response to the NA5 site will optimise the potential for on-site mitigation.

Policy BIO4: Green Infrastructure

- 2.93 To ensure the policy is effective, taking into account a variety of site characteristics (for instance where on site blue infrastructure or woodland may not be relevant or feasible), so as not to prevent sustainable sites from coming forward, the wording should be amended to: *'Development will conserve and enhance green and blue infrastructure where applicable and feasible.'*

Policy BIO5: Trees and Hedgerows

- 2.94 Developments should only be required to take account of off site trees where they may be impacted and would be relevant to the proposal. In this case, to ensure this part of the policy is both justified and effective, the wording should be clarified as follows: *'Development will be permitted where the proposed development takes account of trees, both above and below ground, (including on site and off site trees where applicable) where;'*

Policies DES1 (Delivery of Sustainable and High Quality Design), DES2 (Design Details and Considerations) and DES4 (Public Art)

- 2.95 Bellway would endorse the high quality approach to design set out in policy DES1 and will be evolving the masterplan for Manor Farm (Enham Park) in collaboration with the Council's Design Review Panel and with public engagement early in the design process. Further, Bellway concurs that Design Coding is an appropriate design tool for securing quality objectives and to shape the placemaking and beauty of larger multi-phased sites like the Manor Farm (Enham Park) development. This will be undertaken using the structure of the National Model Design Code and / or following local guidance.
- 2.96 The last paragraph of Policy DES2 appears to go above the requirements of the NPPF, which requires developments to be reflective of and sympathetic to local character (paragraphs 133 and 135). However the policy text as currently drafted requires developments to improve character. In order for the policy to be justified and effective in accordance with national policy, it should be amended to: *'Development will not be permitted if it is of poor design and where it fails to improve reflect or enhance the character, function, appearance and quality of the area'.*
- 2.97 Bellway acknowledges and supports that the integration of public art within the Manor Farm (Enham Park) development would achieve beneficial placemaking and local identity design objectives.

Policy HOU1: Affordable Housing

- 2.98 Bellway note that the supporting policy text (paragraph 5.356) states that the affordable housing thresholds set out in the policy text do not provide for meeting the affordable housing need in full. It is clear from this statement and the fact that there is already an affordability issue in TVBC identified by the evidence base, that there is a need to maximise existing draft allocated site capacity to make efficient use of land, boosting the supply of both market and affordable homes in accordance with paragraph 128 of the NPPF. In this

context, allocating additional housing numbers at Manor Farm (Enham Park), north of Andover would be justified and an appropriate response to help address the issue.

Policy HOU6: Residential Space Standards

- 2.99 The SHMA (2022) sets out a need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings in the Borough, suggesting that the Council could consider requiring all dwellings (in all tenures) to meet the M4(2) standards and at least 10% of homes meeting M4(3). The policy however proposed 20% M4(3) with 10% at M4(3)A and 10% at M4(3)B. There is however no further justification for this specific uplift of a further 10%. The SHMA also specifies that any policy should be applied flexibly, in case it is not possible to achieve the requirements due to viability or site-specific circumstances.
- 2.100 The NPPG states that policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable (Paragraph: 008). In this case flexibility for this requirement to account for these factors is important and will help to ensure the policy justified and effective.
- 2.101 In this case, the policy as worded is not fully justified with the level of M4(3) homes required and does not provide enough flexibility in line with the recommendations of the SHMA. In order that the policy is justified and effective, the policy should align with the suggested 10% for M4(3) or if the higher amount is required then this should be justified through the evidence base. Further, the start of the policy should be amended to state: *'The Council will negotiate on major residential sites where practically achievable and financially viable, for the provision of...'* to align with the SHMA recommendation.
- 2.102 The policy also sets a requirement for all residential development to meet the nationally described space standards. Evidence and justification for this requirement need to be provided within the DLP evidence base.

Policy HOU7: Self-Build and Custom Build Housing

- 2.103 The policy proposes that sites of 100+ homes would be required to provide 5% of developable plots for self and custom build housing. Bellway consider that there are many practical issues with developing sites that include self and custom build plots as there are often multiple contractors and large machinery operating on-site. From both a practical and health and safety perspective, it is difficult to accommodate the development of single plots by individuals alongside the construction of market and affordable homes, and these issues are not specifically considered within the DLP's Viability Assessment (2022).
- 2.104 The Council should first consider other opportunities to meet this demand, including working with developers and land owners to identify additional sites suitable for self and custom build plots that can meet their needs, in accordance with paragraph 57-029 of the NPPG. If the strategy for a blanket approach of 100+ dwellings to meet the requirement remains then justification should be provided. It is noted that the SHMA states that the exact level of self and custom build plots should be determined in reference to the number and

capacity of strategic sites and the overall local need as identified on the register. This should also take into account the committed supply, need for other types of housing (including affordable housing need) and viability. Therefore sufficient justification for the requirement must be set out in the evidence base and flexibility incorporated into the policy based upon demand and viability.

- 2.105 The policy provides a mechanism as to when self and custom-build plots should return to the developer to be built out. Bellway considers that a 12 month marketing period, rather than a 24 month period as proposed, is more than sufficient to establish if there is a need for the plots as self/custom build. Other LPA's such as St Albans City and District Council have proposed a 12 month marketing period and TVBC have not provided justification as to why a higher than usual period is required. This should be amended to 12 months and justification / further details provided so that it is clear what is required through the marketing strategy and valuation to be approved by the local planning authority, unless this relates only to making details available to people on the custom and self-build register in Test Valley.

Policy EC5: Skills and Training

- 2.106 Bellway is conversant with and supportive of the employment and skills policy requirement. As an Employer of Choice one of the company's key performance indicators is to increase the percentage of its work force in an 'earn and learn' role. As of FY23, 8.3% of the Bellway workforce were in that role and we have retained our 5% Club, gold membership for FY23. This commitment extends to new apprenticeships and graduate entry. Working with their sub-contractors Bellway will be pleased to support and achieve Construction Industry Training Board's objectives at Manor Farm (Enham Park).

Policy TR3: Parking

- 2.107 The policy requires development to be in accordance with the Council's parking standards, however it is noted that the supporting text states that the standards are yet to be reviewed, which will be undertaken prior to the Regulation 19 stage of the local plan process. In this case Bellway will review and respond accordingly at the Regulation 19 stage, once the information is available to review and comment.

Appendix 3: Strategic General Requirements for Strategic Site Allocations

- 2.108 Within the 'Landscape and Green Infrastructure' section, it is noted that the policy requires development to conserve and enhance the landscape and scenic beauty of the New Forest National Park and the North Wessex Downs National Landscape. However, in order to ensure the policy is justified and effective the wording should be amended at the end to include 'where relevant / applicable'.

3.0 Conclusion

- 3.1 Bellway supports the DLP's overarching spatial strategy as a general approach to seek to identify and focus development at the most appropriate and largest sustainable settlements and fully supports TVBC's approach in applying the standard method as a minimum housing requirement. This must be set at an absolute minimum, with flexibility provided through site allocations over and above the requirement, due to the identified affordability issues and potential for unmet housing need from neighbouring authorities, including that as highlighted in the Partnership for South Hampshire Spatial Position Statement, which should be fully considered and accommodated where practical in order for the plan to be sound and in accordance with NPPF paragraph 35.
- 3.2 It will be vital that the Council actively engages with all neighbouring authorities as part of the duty to co-operate and consider how it could increase its own housing requirement and supply to address some of the potential unmet needs identified, otherwise there is a risk that the plan will not be considered to be legally compliant or positively prepared.
- 3.3 Given the nature of Test Valley borough, if housing needs are to be met, the development of greenfield land in the most sustainable locations will be necessary and so there is some concern over the deliverability and sustainability of allocations at Ludgershall, which is located outside of the borough. Such an approach would also be contrary to the DLP's strategy and focus for growth. Provided sustainable, deliverable and suitable sites are available within the borough, such as at Manor Farm, north Andover (Enham Park), growth should be focussed and maximised where possible towards the main settlements, where the greatest range of services, jobs and infrastructure are present.
- 3.4 Bellway would highlight that the currently unidentified rural housing requirement, which accounts for a housing supply of 542 dwellings (5% of the borough requirement), should be identified in this DLP through consultation with local communities to ensure the housing requirements can be met and the plan can be found sound, being effective and justified in accordance with paragraphs 23 and 69 of the NPPF.
- 3.5 Bellway also supports the proposed allocation of land at Manor Farm, Andover (Enham Park) and considers that the whole land, including the proposed extension to the north, north west and north east, is a suitable and sustainable location for housing, which accords with the spatial strategy and helps to meet the Borough's housing need. Increasing capacity to at least 900 homes would provide greater flexibility/relief to help address affordability issues and unmet need from neighbouring authorities. The site is available now and would meet the definition of deliverable in the NPPF. The technical work progressed to date has not identified any fundamental constraints that would prevent the delivery of housing on the site within the next five years.
- 3.6 The allocation of Enham Park will provide a significant contribution to TVBC's housing need over the plan period, and would enable the delivery of new housing at a sufficient scale to deliver appropriate infrastructure and facilities that would serve both the new and existing local communities. The inclusion of the additional areas to the north, north west and north east within allocation NA5 would allow for more flexibility in the design and layout of the residential parcels and green infrastructure, and create greater opportunities for access to

the countryside, sport and recreational facilities, sustainable energy generation and biodiversity and connectivity benefits.

3.7 Bellway Homes considers that the emerging vision for this site will create a truly sustainable urban extension to Andover and in broad terms the delivery of at least 900 new homes on the site would secure the following key benefits:

- The delivery (within the next five years) of much needed housing including affordable and potential for specialist housing, within a short distance of Andover town centre
- The site would make a meaningful contribution to housing supply across a range of types and tenures, in a sustainable location that would support the locality and is consistent with the government's overarching policy objective to boost significantly the supply of housing
- Small local centre
- Outdoor sports facilities and local areas of play
- Green and environmental mitigation benefits
- Potential for a small solar farm
- Local employment provision
- Improvements to surrounding public transport service
- Dedicated walking and cycle routes, linking the site with the surrounding area and Andover town centre
- New community park and orchards/allotments
- Green corridors and opportunities for biodiversity enhancement that can provide mitigation benefits
- Opportunities for natural play and healthy living through new homes being set within and natural framework of open and landscaped spaces
- Economic benefits, through construction activities and increased local population
- It is anticipated that it would be possible to deliver new homes by the Q1 2028, and therefore the site could contribute to meeting the housing needs of the district, early in the plan period.

3.8 The Manor Farm (Enham Park) site provides a sustainably located and unconstrained site in close proximity to the town centre, that is capable of delivering a significant level of new high-quality family housing as well as numerous wider enhancements. Allocation of the whole site would align with the overarching spatial strategy, provide a proportionate response to the housing need, and clearly meet the soundness tests, being justified, positive and effective.

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