

For Attn:
Test Valley Borough Council

Via:
Email

Wiltshire Council

2nd April 2024

Dear Graham

Test Valley Local Plan 2040 Regulation 18 Stage 2 Public Consultation

Thank you for inviting Wiltshire Council to comment on the Draft Test Valley Local Plan 2040 (TVLP) Regulation 18 (Stage 2) consultation. We welcome the opportunity to provide comment at this important stage in the plan making process, alongside our ongoing commitments to collaborative working with Test Valley on cross-boundary and strategic planning matters that are of relevance to both authorities' emerging Local Plans.

Our comments are structured as follows:

- Status of the emerging Wiltshire Local Plan
- Test Valley Local Plan 2040 spatial strategy
- Proposed allocations at Ludgershall
- Other matters

Status of the emerging Wiltshire Local Plan

Wiltshire Council is in the process of reviewing the adopted Wiltshire Core Strategy which has a plan period that extends until 2026. The emerging Wiltshire Local Plan (WLP) will cover a new plan period of 2020-2038 and has recently been through Regulation 19 (pre-submission) consultation. Wiltshire Council officers are in the process of reviewing responses received during the consultation and are working towards submission of the draft WLP for examination later this year.

Wiltshire Council's draft WLP includes the proposed allocation of a strategic site on land south-east of Empress Way, Ludgershall. This site falls within Wiltshire Council's administrative area and adjoins the administrative areas of Test Valley Borough Council and Hampshire County Council. It has therefore been the subject of cross-authority discussions already. It should be noted that the proposed WLP level of housing at Ludgershall and its associated allocation form a key part of the spatial strategy for Wiltshire's Salisbury Housing Market Area (HMA). Timely delivery of the site at Ludgershall is particularly important for meeting Wiltshire's housing requirements.



We have particular interest in the proposed Spatial Strategy of the draft TVLP (Section 3) and following draft TVLP proposals for development close to and adjoining the draft WLP Plan allocation at Ludgershall, which form the basis of our response:

- Northern Area Policy 7 (NA7): Land to the East of Ludgershall (350 homes)
- Northern Area Policy 8 (NA8): Land to the South East of Ludgershall (1,150 homes and a 1.5 FE primary school)

Test Valley Local Plan 2040 spatial strategy

The draft TVLP and supporting Spatial Strategy Topic Paper explains the evolution of the proposed spatial strategy. In terms of spatial distribution, the draft TVLP proposes to continue to split the borough into two Housing Market Areas (HMAs), the northern HMA focused around Andover and the southern HMA focused around Romsey, which also has a spatial relationship with Southampton creating development pressure in this area. The draft TVLP sets out a settlement hierarchy which is split into four tiers, with the largest settlements of Andover and Romsey forming the Tier 1 settlements, i.e. the largest and most sustainable settlements.

The proposed spatial strategy seeks to distribute development with more dispersal of growth compared with the adopted Local Plan which places greater focus on the Tier 1 settlements. The emerging spatial strategy identifies a focus for growth at Andover and Romsey as Tier 1 settlements, and also a wider distribution of growth to a larger number of settlements in accordance with the settlement hierarchy. Ludgershall is not one of the settlements within the hierarchy (Figure 3.1).

The draft TVLP has assessed 4 potential growth scenarios for each of the HMAs. For the northern HMA Scenario 1 is the preferred approach, which is to focus growth at Andover (a Tier 1 settlement) and adjoining the Wiltshire settlement of Ludgershall. The draft TVLP describes Ludgershall as having good access to services, facilities, employment, and public transport. The supporting TVLP Spatial Strategy Topic Paper explains that while Ludgershall falls within Wiltshire and is therefore not in the Test Valley settlement hierarchy, it is considered to be the equivalent of a Tier 2 settlement, being classified as a Market Town in the draft WLP.

The Wiltshire Core Strategy and draft WLP pair Ludgershall collectively with Tidworth as a Market Town, recognising that the two settlements are closely linked in terms of shared services and the presence of the military. As such, Wiltshire Council plans for the two settlements together rather than separate from each other.

Looking at the alternative growth scenarios presented in the draft TVLP evidence base, we note that the other largest 'variable' site at Finkley Down Farm (SHELAA site 165) appears to yield more positive outcomes through the housing site appraisal process than Land to the East of Ludgershall, and considerably more positive outcomes than Land to the South East of Ludgershall. Constraints on the delivery of the Finkley Down Farm site are noted in the concluding comments, in relation to landscape and highways impacts, which appear to have demoted the site beneath the two Ludgershall sites in order of preference, although from the basis of the SA outcomes there do not appear to be showstopper constraints against the potential for some delivery of growth on this site. This indicates that there are alternative strategic sites that could be brought forward that would reduce the reliance on Ludgershall within the plan period.



Test Valley Local Plan 2040 proposed allocations at Ludgershall

Wiltshire Council has previously supported the emerging Spatial Strategy through previous stages of consultation, which sought to direct development to existing settlements depending on their position within the settlement hierarchy. However, the emphasis has now changed and Ludgershall has been included as a location for strategic allocations. While there are some benefits of expanding Ludgershall into Test Valley Borough we are concerned over the scale of growth that is being proposed that overlaps with planned growth in Wiltshire over a similar plan period; and potential implication this may have for place-shaping of the settlement.

We note that the proposed two draft TVLP allocations at Ludgershall of 1,500 homes, added to the draft WLP proposed allocation of 1,220 homes, represents a significant uplift to the scale of growth to be planned for Ludgershall within a relatively short timeframe up to 2040. We also note that 40% of the new strategic allocations over the 11 year extended plan period in the TVLP northern HMA are proposed to be placed adjoining Ludgershall. This does not appear to align with the plan's Spatial Strategy, which focuses on meeting needs of settlements within the hierarchy.

The draft TVLP is supported by a Housing Trajectory (January 2024) document that identifies assumptions about the rate of site delivery, and we note assumptions made about housing delivery for site NA7, which is expected to deliver 350 homes between the years 2028/29 – 2032/33; and housing delivery for site NA8, which is expected to deliver 1,150 homes between the years 2031/32 – 2039/40. There will be overlap from the anticipated delivery of the draft WLP allocation site. While Wiltshire Council is of the view that Ludgershall is a sustainable location for growth, as demonstrated by the proposed WLP allocation, this does not mean that any scale of growth is justified within the plan period. Development of the town needs to be phased in a coordinated way, logically extending from Empress Way in a west-east fashion and of a scale that benefits the town, with coordinated delivery of infrastructure.

We have some concerns about the ability of the market to accommodate such high levels of housing and the timely provision of infrastructure to support this, which will have implications for the delivery of the strategic allocation in Wiltshire. We would anticipate that growth within Wiltshire would be the logical starting point for any expansion of Ludgershall, with further growth within Test Valley to follow.

Education

As noted in the draft TVLP further discussions will be required regarding school provision in the context of existing facilities and cumulative growth in the area. We would note that there is insufficient capacity at Wellington Academy in Ludgershall to be able to accommodate the scale of growth envisaged in Test Valley, on top of the growth that is already planned through the draft WLP.

With regard to primary education we would query if a 1.5FE primary school, as proposed in policy NA8, is large enough to accommodate the development of 1,500 homes within the Test Valley/Hampshire area. Our multipliers indicate that at least a 2FE school would be required.



Highways

Delivery of Wiltshire Council's draft WLP site is expected to be dependent on the delivery of a southern link road between Empress Way in Wiltshire to Andover Road (A342) within Test Valley Borough and Hampshire County, with the trigger point for the need for this connection yet to be determined through transport modelling that is currently being undertaken. Consequent implications for proposed phasing are therefore to be determined.

Detailed comments responding to the highways evidence base and draft TVLP proposals are included separately at Appendix 1.

Ecology

There are two internationally designated nature conservation sites of that relate to both Wiltshire and Test Valley:

- Salisbury Plain Special Protection Area (SPA) – potential recreational disturbance, with regard to the stone curlew
- Solent Region SPA, Special Area of Conservation (SAC) and Ramsar – nutrient neutrality for residential and overnight accommodation development, for phosphates and nitrates respectively.

Salisbury Plain SPA

Wiltshire Council has been working with Test Valley in respect of cross boundary matters concerning the Salisbury Plain SPA and proposed allocations to consider appropriate mitigation. The two draft TVLP allocations at Ludgershall lie within the SPA 6.4km zone of influence (Zol) within which recreational pressure arising from residential development must be addressed with adequate and appropriate mitigation to ensure compliance with the Habitats Regulations. It is recognised that these discussions are ongoing.

Solent Internationally Protected Sites

Similarly, Wiltshire Council has been working with Test Valley in respect of cross boundary matters concerning the Solent International Protected Sites, and established working relationships are in place in regard to protected sites.

It is noted that policies NA7 and NA8 of the draft TVLP omit reference to their location within the River Test catchment and the need for mitigation in relation to the Solent internationally designated sites. Cross references to proposed policy BIO2, which sets out policy requirements relating to international nature conservation designations, are included in other proposed allocation policies, so for consistency the same cross referencing would be included for proposed Ludgershall allocations.

Also, in case it is helpful we have included some comments below in relation to more detailed ecological matters.



Ancient Woodland

With regard to Willis Wood, an area of ancient and semi-natural woodland that adjoins proposed allocation NA8 we would recommend that the need for an ecological buffer to the ancient woodland specifies a set distance of at least 15m to align with the 'Buffer zone recommendations' section of Government guidance¹ in respect of ancient woodland.

Protected Species and Species of Conservation Concern

Wiltshire Council's proposed Local Plan allocation at Ludgershall affords potential nesting habitat for farmland birds such as skylark and meadow pipit, and foraging opportunities for wintering birds. The draft WLP allocation policy requires a survey to inform suitable mitigation for ground nesting bird species and it may be appropriate for the allocation policies in the draft TVLP to also consider the potential for farmland birds.

A dormouse population has been recorded in the ancient woodland sites on the northern and eastern periphery of Ludgershall. Given that Willis Wood is located adjacent to the proposed Test Valley allocation NA8, it is suggested this is considered with potential to specify for a survey in the associated policy and / or supporting text.

Other Matters

Noting that cross boundary growth at Ludgershall is being promoted by the same landowner, it will be important to ensure a consistent policy approach to delivery requirements. We note that policies for affordable housing, residential space standards and self build are broadly consistent which is supported.

Summary

In summary, we have concerns with the spatial strategy and the proposed approach of directing such a significant scale of growth to Ludgershall within the TVBC plan period. This would have implications for Ludgershall as a place and the timely delivery of the allocation proposed through the draft WLP. We would welcome further discussion to review this matter in further detail, with a view to determining an appropriate scale of growth for Ludgershall within the plan period and its potential for growth as part of a longer-term strategy.

Notwithstanding the above, both our plans recognise the need for masterplans for strategic allocations and it will be important to plan comprehensively for sites at Ludgershall. This would need to consider anticipated trajectories across both authority's proposed allocation sites, with a view to setting a single overall comprehensive (cross-boundary) masterplan, which will address phasing and delivery, as well as shared infrastructure and sustainable transport. This will help to ensure that improvements to local service provision takes place in a manner which is commensurate to the scale of growth envisaged, and that potential for in-combination and cumulative effects on ecological receptors can be appropriately mitigated.

¹<https://www.gov.uk/guidance/ancient-woodland-ancient-trees-and-veteran-trees-advice-for-making-planning-decisions#avoid-impacts-reduce-mitigate-impacts-and-compensate-as-a-last-resort>



Wiltshire Council wish to continue to engage with Test Valley Borough Council on plans for Ludgershall, with a focus on phasing and delivery of development, delivery of infrastructure and community facilities, and ecological mitigation.

We look forward to further engagement and cooperation with you on the matters above, and any other planning policy matters, as appropriate as the plan progresses.

Yours sincerely,

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Senior Planning Officer

Spatial Planning
Wiltshire Council



Appendix 1: Highways comments relating to the draft TVLP and evidence base

With regard to the draft TVLP Preliminary Transport Assessment and having looked through the data outputs (Flow Difference charts) on pages 69 and 71 and model extents (figure 5-1, p.56), it is clear that Ludgershall is included in an area of 'less detailed modelling' and this may be generating anomalies. When considering the difference in flow charts, DS1 (Growth Option 1 – 350 dwellings at Ludgershall) generates an increase on the A342 east of Ludgershall of 110 trips, whilst DS2 (Growth Option 2, 1500 dwellings) generates 390 trips. When considering the number of dwellings, DS1 generates 0.314 trips per dwelling and DS2 0.26 trips per dwelling. Because the higher dwelling count generates a lower trip rate, this may be indicative of trip suppression, however there is no evidence of why this is occurring from the Volume over Capacity (V/C) analysis; a congested network, i.e. high V/C, may restrict journey movements in favour of travelling outside of typical peaks – peak hour spread etc.

With regards to trip rates, whilst Wiltshire Council recognise that the difference in flow chart is not wholly representative of a single development's impact, given the isolation of the Ludgershall development it is considered an appropriate marker of impacts. In this regard, and should this be proven to be the case, then Wiltshire Council consider the output trips to be very low and not indicative of a typical dwelling whose range would be between 0.45 and 0.6 trips per dwelling.

To address these concerns, Wiltshire Council would welcome sight of the Local Model Validation Report and Forecasting Report for the NHTM and collaboration to determine a more focussed modelling analysis of impacts in and around Ludgershall.

Focusing on the proposed NA7 site (Land to the East of Ludgershall), primary access is proposed from the layby or generated junction provision to the south from the A342, and alternative access arrangements appear restricted due to a lack of connectivity with existing highway infrastructure. Mapping indicates a former track existing to the north west of the site, however this appears to be significantly overgrown with vegetation, is not included in the site allocation, nor is it highway/PROW and would only lead to Biddesden Lane which does not provide infrastructure to accommodate segregated access for pedestrians and cyclists. To the west of the site, it may be possible to connect to Pretoria Road for walking and cycling, however this would result in the significant remodelling or removal of a Town Council maintained and owned play area. The lack of alternative access for any mode of transport, would place reliance upon the A342 (Andover Road) to convey residents from the site to the town centre. With consideration of available infrastructure, Andover Road is supported by narrow footways that do not extend to the site and no cycling infrastructure is presented. Andover Road is therefore not considered sufficient to accommodate the sustainable transport needs of the development site. Due to the constraints of accessing the development site, Wiltshire Council recommend that the narrative provided in paragraph 4.90 is altered to illustrate that the site would need to provide new and enhanced walking and cycling infrastructure to connect to the Town Centre and further afield; and reliance upon 'existing pedestrian [and] cycleways' should not be stated as a means to achieve sustainably accessed development.

With reference to proposed site NA8 (Land to the South East of Ludgershall), this site adjoins Wiltshire Council's proposed Local Plan allocation and will therefore generate similar, but additional demands for amenities and infrastructure. As noted above, to ensure that these demands are met and that the combination of the two sites can maximise the use of sustainable modes of transport, Should the allocations continue to be proposed through the draft TVLP, Wiltshire Council would



welcome collaboration on a single consolidated masterplan including both sites, to include access and movement framework plans. Of key consideration will be education and retail related trips associated with the developments.

With regards to access to proposed site NA8, the site would utilise the same railway bridge access that is proposed to serve the draft WLP site (subject to confirmation of a trigger point). We consider that a masterplanned approach will be needed to consider phasing and impact plans, to determine the earliest viable delivery of the bridge and to avoid over-loading of Wiltshire's highway assets which could detrimentally affect the amenity of existing properties.

Due to the positioning of the railway line the site has limited opportunity to access the Town Centre by walking and cycling. Given the scale of growth existing infrastructure is not considered sufficient and new and enhanced infrastructure should be proposed, which Wiltshire Council would recommend forms part of a required Access and Movement Framework plan. We would recommend that text in paragraph 4.97 is addressed to secure improvements to the walking and cycling network.

With regards to bus service provision, both proposed sites NA7 and NA8 cite the Activ8 bus service as accommodating the needs of the development. It will be important to address the need for bus routing to penetrate into the developed urban fabric, to maximise opportunities for residents to utilise sustainable transport options.

