

Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 2

COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 2 document for public consultation. This consultation document sets out a vision for Test Valley up to 2040, objectives for achieving this vision, our development needs alongside allocations for residential and employment development and theme-based policies.

The consultation period runs from Tuesday 6th February to noon on Tuesday 2nd April 2024. Please respond before the close of the consultation period so that your comments may be taken into account.

You can respond to our consultation by filling out the form below. This form has two parts:

Part A: Your Details

Part B: Your Comments (please fill in a separate sheet for each comment you wish to make)

Further information can be found on our website at:

www.testvalley.gov.uk/localplan2040

Once the form has been completed, please send to planningpolicy@testvalley.gov.uk below by **noon on Tuesday 2nd April 2024**.

Following receipt of your comments from, we will keep you informed of future consultation stages unless you advise us that you want to opt out of such communication.

If you are unable to send via email, please send a postal copy to our address below.

Contacting us

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

Tel: 01264 368000

Website: www.testvalley.gov.uk/localplan2040

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Mr	First Name*	Robin
Surname*	Shepherd		
Organisation* (If responding on behalf of an organisation)	Stantec		

Please provide your email address below:

Email Address*	
-------------------	--

Alternatively, if you don't have an email address please provide your postal address.

Address*			
		Postcode	

If you are an agent or responding on behalf of another party, please give the name/ company/ organisation you are representing:

L&Q Estates

Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/ postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment.

All representations and related documents will be held by the Council until the Local Plan 2040 is adopted and the Judicial Review period has closed and will then be securely destroyed.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are

available on our website here:
<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

Part B: Your Comments

Please use the boxes below to state your comments. This includes one box for general comments and another for specific comments related to an area of the Local Plan.

Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

General
Please see attached statement

For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible. Please use the box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

Paragraph Ref	Specific Comments
	Please see attached statement

What happens next?

All valid responses received within the consultation period will be acknowledged and you will be given a reference number. Please quote this reference number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent directly to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.



Bere Hill, Andover

Representations to Test Valley Local Plan 2040 Regulation 18 Stage 2

Date: 27th March 2024

On behalf of **L&Q Estates Limited**

Project Ref: 333100979 | Date: 27th March 2024

Registered Office:

Office Address:

T:

Document Control Sheet

Project Name: Bere Hill, Andover

Project Ref: 333100979

Report Title: Representations to Test Valley Local Plan Regulation 18 Stage 2

Doc Ref: Reg 18 Stage 2 Reps

Date: 27th March 2024

	Name	Position	Signature	Date
Prepared by:	Jane Piper	Director		
Reviewed by:	Robin Shepherd	Director		21/03/2024
Approved by:	Robin Shepherd	Director		27/03/24
For and on behalf of Stantec UK Limited				

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.

This page is intentionally blank

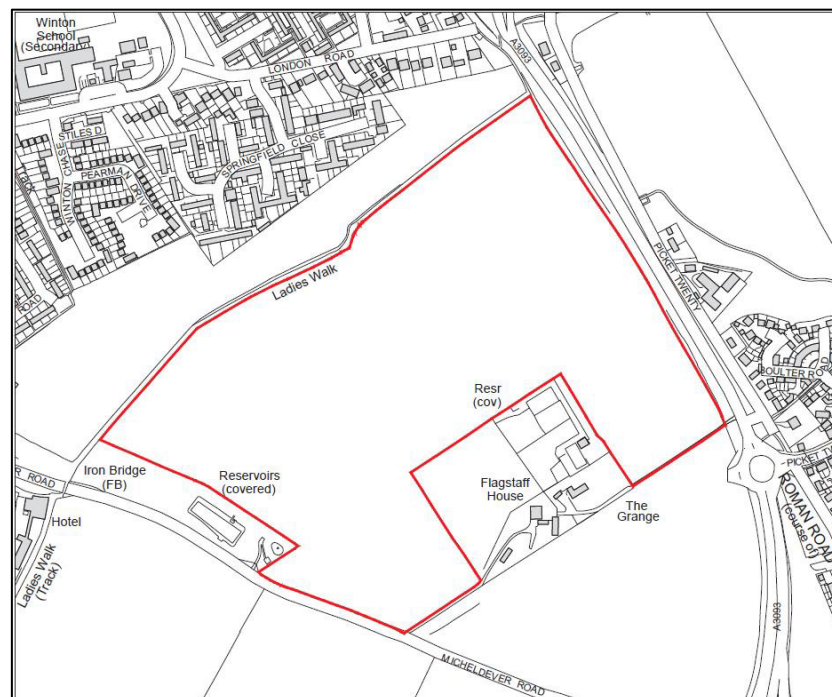
Contents

1	Introduction.....	1
2	Spatial Strategy	3
3	Policy NA6 – Land at Bere Hill, South Andover	8
4	L&Q Suggest that Northern Area Policy 6 (NA6) be modified to read:	12
5	Conclusion	13

1 Introduction

- 1.1 These representations have been prepared on behalf of L&Q Estates Limited (hereafter referred to as “L&Q”) in response to the Test Valley Local Plan Regulation 18 Stage 2 consultation. L&Q has an interest in the land at Bere Hill, Andover (hereafter referred to as the “Site”) which is being promoted for development through the Local Plan process.
- 1.2 The Site, and the parcels of land to the south (owned by the Council) and the southwest (promoted by the Peel Group) are subject to a collective proposed allocation (Policy NA6) in the Regulation 18 Stage 2 version of the Test Valley Local Plan to which these representations relate.
- 1.3 These representations set out how L&Q support the proposed allocation of the Site and further demonstrate how the Site is available, suitable, achievable and a deliverable site, when considered against the definitions contained in the National Planning Policy Framework (NPPF) (2023), that would help meet Test Valley’s housing need whilst also providing benefits to the existing local community.

The Site



- 1.4 The Site, as noted on the above plan, extends to approximately 30 hectares and is located on the eastern edge of Andover, approximately 1km from the town centre. To the east of the Site lies Picket Twenty, which has been the subject of large scale residential development, with associated primary school, local centre and park. The northeast boundary of the Site comprises the A3093 bypass with connections onto the A303 to the south and the B3400 (London Road) to the north. Walworth Industrial Estate lies to the north of the Site, which offers a range of employment. The southwest boundary of the Site comprises a covered reservoir and Micheldever Road. The northwest boundary comprises a public right of way known as Ladies Walk, beyond which is the residential area off London Road and the Winton Academy Secondary School and Mark Way Special Education school.
- 1.5 The Site is considered to be in a sustainable location, being surrounded by development on two sides and well related and connected to existing services and facilities as well as the existing settlement of Andover. It would represent a logical extension to the settlement.
- 1.6 As demonstrated through previously submitted representations, Vision Documents, and concept masterplans, some of the key components and benefits proposed on Site are:
- Up to 450 much-needed market and affordable homes of various types, sizes, and tenures to reflect the needs of the local community,
 - a country park in the western element of the Site including extensive new planting,
 - new pedestrian and cycle links within the Site and to the wider area,
 - integrated blue infrastructure into the open space, and,
 - biodiversity net gain improvements.

2 Spatial Strategy

Vision and Objectives

- 2.1 Chapter 2 of the Local Plan sets out the proposed vision for Test Valley Borough for the plan period of 2020-2040 which states:

“By 2040, Test Valley Borough’s communities will be prosperous and resilient by:

Providing access to good quality homes that will meet a range of needs and aspirations, including affordable housing. Countering our changing climate through mitigation and adaptation and delivering well designed developments to a high standard that encourage inclusivity, health and security. High quality of life will be experienced by our communities, and they will enjoy a strong sense of identity. Development will take place in sustainable locations and support the delivery of infrastructure.

The Borough’s economy will be thriving and supported by a skilled workforce. The economy will experience sustainable growth across a range of sectors, including the high technology and green industries and the visitor economy. Residents will have access to training, education and work opportunities and enjoy well-connected working environments. The Borough will continue to be known for its varied, green and distinctive landscapes, heritage and rich ecology.

Our diverse natural, built and cultural resources will be safeguarded for future generations to enjoy including access to our outstanding countryside. The character of our individual settlements will be maintained and their sense of place enhanced. The market towns of Andover and Romsey will have thriving town centres, offering high quality connected green and public spaces and a mix of leisure, shopping and cultural facilities and homes, with sustainable transport connections.

Communities will be empowered to plan to meet the varying needs and priorities of their communities to help support their sustainability and vibrancy.

2.2 L&Q supports the proposed Vision and considers that the proposed allocation of the Site will be able to directly contribute to achieving its vision by:

- providing a wide range of good quality homes on a well located, well connected and sustainable site which will result in the creation of a new and inclusive neighbourhood of Andover;
- contributing toward the high quality of life through the provision of a high-quality development and associated facilities;
- contributing toward addressing climate change through sustainable development in a sustainable location;
- providing new homes within close proximity to Andover Town Centre helping to boost the local economy whilst supporting the town's services and facilities, and the Council's ambitions to revitalise it;
- providing an extensive area of open green space in the form of a country park, a buffer to Ladies Walk as well as incidental greenspace and play space, in accordance with Local Plan policies;
- protecting the wider countryside for the ongoing and future enjoyment of communities;
- creating thousands of temporary construction jobs.

2.3 The proposed 'objectives and challenges' are set out in Chapter 2 of the draft Local Plan. L&Q supports these spatial objectives and considers the proposed allocation of the Site facilitates achieving these, as set out below:

1. Climate Change

The Site is in a sustainable, accessible and well-connected location. The Site can accommodate homes, facilities and infrastructure constructed to high standards of sustainable construction, with energy efficiency in mind and accordance with the relevant Building Regulations and Future Homes Standards ensuring any development is adaptable and resilient to the changing climate.

2. Our Communities

The development of the Site will secure lasting benefits for Andover including enhancements to social infrastructure and provision of high quality, attractive green infrastructure.

3. Town Centres

The allocation of the Site will support the vitality of the nearby Andover Town Centre by providing new population that will utilise the town centre for services, jobs and retail. The Site will be connected to the town centre by existing (and enhanced where necessary) pedestrian, cycle, public transport and vehicular access routes.

4. Built, Historic and Natural Environment

The Site can be developed sensitively to conserve and enhance the existing built, historic, and natural environment by carefully considering the location(s) of green spaces and landscape buffers to Ladies Walk, the Iron Bridge and listed buildings adjacent to the Site.

5. Ecology and Biodiversity

The Site can be developed to enhance the connectivity, quantity, and quality of ecological and green infrastructure networks by utilising sustainable drainage features and retaining trees and vegetation where possible. The proposed development would incorporate the requisite standards for biodiversity net gain.

6. Health, Wellbeing, and Recreation

The Site can provide opportunities for recreational, and community activities, through the provision of the country park, a network of accessible open spaces and access to the countryside; all of which can encourage active lifestyles and enhancing health and wellbeing for future communities.

7. Design

The Site can be delivered to provide a safe, attractive, integrated, and well-designed environment that takes account of and responds to the local context and character creating a true sense of place.

8. Housing

The Site can deliver good quality and well-designed affordable and market homes of varying sizes, styles and tenures informed by and providing for local needs, assisting the Council in meeting their housing requirements.

9. Economy, Prosperity, and Skills

The development of the Site will create temporary construction jobs and a permanent increase in Council Tax revenue helping ensure the local economy is vibrant and resilient. Furthermore, the homes in a sustainable location with excellent connections to major local employment, therefore providing homes that will support economic growth.

10. Transport and Movement

The Site is in a sustainable location and will be designed to ensure active and sustainable modes of transport that are accessible, safe, and attractive to use to encourage new residents to walk and cycle rather than use their cars.

Settlement Hierarchy

- 2.4 L&Q considers the settlement hierarchy identified in Policy SS1 (Settlement Hierarchy) is logical and justified in the context of the overarching vision and objectives. The Borough's settlements are categorised into tiers based on their facilities and Settlement Assessment Outcomes.
- 2.5 Whilst the categories are simply labelled Tiers 1-4, Andover and Romsey are the only two settlements awarded Tier 1 status, with Policy SS1 stating suitable designations could include strategic allocations.
- 2.6 L&Q therefore considers the proposed allocation of the Site supports the spatial strategy and sustainable approach of providing new housing, services and facilities close to existing higher order settlements where possible.

Housing Need

- 2.7 In order to meet the tests of soundness set out in the NPPF (paragraph 35), amongst other requirements, Local Plans must be 'positively prepared' providing a strategy which, as a minimum, seeks to meet the area's objectively assessed housing needs.
- 2.8 The housing requirement for the Borough is a minimum of 11,000 homes, to be delivered over the plan period of 2020 to 2040 with an annual requirement of 550 homes. The minimum housing requirement is split between the Northern and Southern Test Valley Housing Market Areas (HMA) as follows:

- Northern Test Valley: 6,270 homes with annual requirement of 313 homes
- Southern Test Valley: 4,730 homes with annual requirement of 237 homes

- 2.9 The Site, located in the Northern Test Valley HMA, could provide up to 450 homes as part of Policy NA6. This is a significant proportion of the Northern Test Valley HMAs annual requirement. The wider draft allocation includes the area of land directly to the south and southwest; which together could provide approximately 1400 homes equating to almost 4.5 years of the Northern Test Valley HMAs annual requirement.
- 2.10 L&Q therefore considers the proposed allocation that includes the Site would make a significant contribution to the Borough's identified housing needs over the plan period in a sustainable location.
- 2.11 As demonstrated through submissions to date, the Site is deliverable. L&Q is working collaboratively with the adjacent landowners and promoters (Peel Developments and Test Valley Borough Council) to bring forward the allocation in comprehensive and sustainable manner in a policy compliant manner. This will include green infrastructure, biodiversity enhancement, a primary school, a secondary access and affordable housing.

3 Policy NA6 – Land at Bere Hill, South Andover

- 3.1 The Site is proposed to be allocated for residential development under draft policy NA6, along with two other adjacent sites. The draft policy includes the provision of up to 1400 homes and states the following:
- a) *A 2 Form Entry Primary School*
 - b) *A significant area of high-quality green space*
 - c) *An appropriate landscape buffer adjacent to Ladies Walk*
 - d) *Submission of Heritage Impact Assessment*
 - e) *A sequential approach to the location of buildings on the Site*
 - f) *Access via A3093 roundabout*
 - g) *Enhancement of existing Public Right of Way*
 - h) *Submission of Noise Mitigation Strategy*
- 3.2 L&Q supports the Site's allocation for the reasons set out in Section 2 and considers this strategic allocation wholly aligns with the overarching vision and objectives proposed for the Local Plan.
- 3.3 With regard to the wording of the policy, L&Q considers it may benefit from minor amendments to ensure the policy is 'unambiguous' as required by paragraph 16 of the NPPF and meets the requirements of the tests of soundness when later assessed at the Regulation 19 stage.
- 3.4 Taking into account the emerging evidence from the Council and their policy requirements, once available. Following this, a comprehensive masterplan will be prepared which will identify how the allocation is best developed as well as the likely number of dwellings. Some flexibility within the identified number of dwellings within the policy is therefore suggested so as to reflect this ongoing work. It is suggested that the policy is re-worded to state "approximately 1400 dwellings".
- 3.5 In regard to Criterion a. it is unclear at this Regulation 18 stage whether a school is required on the Site or whether improvements and extensions to existing local schools could be more efficiently and effectively be provided through funding from the development of NA6. It would therefore be appropriate to note within the policy or supporting text that the school requirement is subject to confirmation from the Education Authority that this is required; or in the alternative, that financial contributions towards nearby schools will be required for their improvement.

- 3.7 In relation to Criterion b. (and Figure 4.6), it is suggested this needs to be informed by a comprehensive masterplan and supporting technical assessments. L&Q acknowledges the desire and need to protect and enhance Ladies Walk and the surrounding landscape and have undertaken a Landscape Visual Impact Assessment and further technical work to further understand this. Any development that comes forward on the Site will seek to conserve and enhance the character of Ladies Walk by extending the woodland character that it exhibits through additional planting. In addition, properties will be set back, as set out in the previously submitted Vision Document. It is also recognised that the masterplan should look for opportunities to co-locate new green infrastructure with existing areas, for enhanced benefits for existing and new residents.
- 3.8 The policy and Figure 4.6 should therefore be revised to require a minimum area of green infrastructure, based upon the masterplan and supporting technical assessments. As such, we suggest the criterion is modified by adding a second sentence as follows, "The quantum, location, form, function and design of housing, supporting uses and green infrastructure will be determined and supported by technical assessments and a comprehensive masterplan".
- 3.9 L&Q suggests that Figure 4.6 only shows the boundary of the allocation and removes reference to 'Indicative Location for Significant Green Space' and 'Indicative Buffer for Noise'; this being determined by the masterplan process and supporting technical assessments.
- 3.10 If, however, Figure 4.6 remains, the indicative location for Significant Green Space and the indicative buffer for noise should reflect the information previously submitted by L&Q via the Vision Document and other promotion materials which has been informed by the technical work undertaken to date; and be identified as for illustrative purposes only. Alternatively, a symbol could be added to the diagram indicating that a noise buffer may be required. In any event, the scale and form of any buffer required will need to be informed by technical assessments and the masterplan.
- 3.11 L&Q has undertaken technical work to demonstrate that a deliverable access can be provided to the Site. However, a development of approximately 1400 dwellings will need to be served by several access points not just from a single point. Criterion f. should therefore be modified to read, "Access via the A3093" and illustrated in Figure 4.6 with an access arrow from the A3093 further north on the L&Q Site if this diagram remains in the Plan, as illustrated in the Vision Document shown below. Such an access can also support the wider allocation and enable a first phase of development to be brought forward at an early stage on the Site.



- 3.12 In relation to criteria d and h of the draft policy, it is suggested that a more general statement is included within the policy or supporting text stating that the masterplan and planning applications should be supported by technical assessments, including Landscape & Visual Impact Assessments, Heritage Impact Assessments and Noise Impact Assessments, with appropriate mitigation being included in any planning application.
- 3.13 The Test Valley Borough Council: Strategic Sites Viability Testing prepared by BNP Paribas Real Estate in December 2023 forms part of the evidence base for the Local Plan which at paragraph 6.2 states: "Residential sales values in the south of the Borough are higher than those in the north. Consequently, the sites located around Andover (Land South of London Road, Land at Bere Hill and Land at Manor Farm) show challenging viability when considered on a 'present value' basis".
- 3.14 Viability is therefore a key consideration on strategic allocation site NA6 and the provision of infrastructure, facilities and services must be sufficiently evidenced and justified to meet Regulation 122 tests.
- 3.15 It is recommended that the policy or supporting text include a statement that the policy requirements will need to be subject to viability testing; and that in the event of viability concerns being demonstrated, any future applications will be assessed fairly and pragmatically.

3.16 In summary, L&Q supports the allocation of the Site as part of a wider allocation. It is considered that an element of flexibility must be retained at this early stage to recognise:

- there are three landowners/developers/promoters who will need to work collaboratively in the preparation of a masterplan and in the delivery of the allocation;
- that further evidence will need to be provided through the application process which will define key elements on the site;
- that the allocation will need to be served by more than one access; for the Site controlled by L&Q, this can be provided north of the roundabout, off the A3093;
- the policy would benefit from minor re-wording.

4 L&Q Suggest that Northern Area Policy 6 (NA6) be modified to read:

“A strategic housing allocation of approximately 1400 dwellings is proposed south of Andover at Bere Hill. Development will be permitted subject to:

- a) Provision of a 2 form entry (FE) primary school and land to enable future expansion, subject to the need being proven;*
- b) Provision of a significant area of high quality and accessible Green infrastructure;*
- c) An appropriate landscape screening buffer adjacent to Ladies Walk,*
- d) 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;*
- e) Access via A3093; and*
- f) The enhancement of the existing Public Rights of Way.*

The form, quantum and broad layout shall be determined by a comprehensive masterplan, supported by technical assessments, including a Noise Assessment, Landscape and Visual Impact Assessment and Heritage Impact Assessment, to respond sensitively to the significance of Ladies Walk, the Iron Bridge and listed buildings adjacent to the site. Planning applications shall be permitted which are in accordance with the agreed masterplan.

The above requirements and wider development plan policy requirements shall be subject to viability testing. In the event that any proposed development is demonstrated to be unviable, the local planning authority will determine any applications pragmatically, based upon the prevailing policy priorities at the time.

5 Conclusion

- 5.1 The emerging Test Valley Borough Council Local Plan needs to be prepared positively in order to meet the Borough's housing need and future economic growth aspirations. L&Q considers the most appropriate strategy for future growth is through the allocation of sites at the Borough's largest and most sustainable settlement, Andover.
- 5.2 Bere Hill represents an opportunity for the Council to provide housing in a highly sustainable location on the edge of the largest settlement in the Borough, close to existing services, public transport links and employment. The L&Q Site can deliver up to 450 new homes from its own access off the A3093 alongside improved pedestrian and cycle links. The Site also provides the opportunity to create a new area of high quality and accessible Green Infrastructure and buffer to Ladies Walk, as well as access to the wider countryside for new and existing residents.
- 5.3 The allocation of the Site, as part of the wider proposed allocation at Bere Hill, will enable the delivery of a variety of homes and tenures to contribute toward the identified housing needs at Andover and the housing market area. The opportunity exists for a high quality, sustainable development, within an attractive landscape setting.
- 5.4 As such, L&Q supports Policy NA6, subject to the suggested modifications outlined above, and the Regulation 18 Stage 2 Local Plan in general when read as a whole.
- 5.5 L&Q will continue to positively engage with the Council and is keen to continue working together through the next stages in the preparation of the Local Plan.