

# 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 6<sup>th</sup> February to noon on Tuesday 2<sup>nd</sup> 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](http://www.testvalley.gov.uk/localplan2040)

Once the form has been completed, please send to [planningpolicy@testvalley.gov.uk](mailto:planningpolicy@testvalley.gov.uk) below by **noon on Tuesday 2<sup>nd</sup> 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

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## Part A: Your Details

Please fill in all boxes marked with an \*

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Miss	First Name*	Katherine
Surname*	Miles		
Organisation* (If responding on behalf of an organisation)	Pro Vision		

Please provide your email address below:

Email Address*	
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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:

Raymond Farming Ltd
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### 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.

<b>General</b>
Please refer to separate representations.

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
	<p>Please refer to separate representations, however in summary, In order to make the plan “sound”, it is considered that the Council need to undertake <b>all</b> of the following:</p> <ul style="list-style-type: none"> <li>• Increase the annual requirement from 550dpa to at least 730dpa to ensure an adequate minimum supply of Affordable Housing to meet future needs (292dpa), allowing for the 40% requirement of HOU1(a); <b>and</b></li> <li>• Extend the Plan period to at least 2041 to comply with the minimum requirement for a plan period to cover 15-years from adoption as required by Paragraph 22 of the Framework, and accommodate the intended adoption date taken from the recently agreed Local Development Scheme of Q2 2026. This plan-period would need to be extended further if:             <ol style="list-style-type: none"> <li>a) The plan is not adopted until 2027 (in line with past performance in the Borough); and</li> <li>b) The allocations at Andover are considered to be a “significant extension” to Andover i.e. where the plan should look ahead over 30 years; <b>and</b></li> </ol> </li> <li>• Allocate land at Harewood Farm (SHELAA Site 322) for development instead of SHELAA Site 167 (Land at Bere Hill) as Site 322 is a more sustainable location for development than that part of the proposed allocation, by reference to the Council’s own scoring within the Sustainability Assessment; <b>and</b></li> <li>• Allocate Harewood Farm (SHELAA Site 379) as an employment site; and</li> <li>• Amend draft Policy EC3 to allow for the expansion of existing employment sites beyond their boundaries where proposals are considered on their individual merits.</li> </ul>

### 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.

# **TEST VALLEY LOCAL PLAN 2040 – REGULATION 18 STAGE 2 REPRESENTATIONS**

Harewood Farm

Prepared by Pro Vision on behalf of Raymond Farming

April 2024

**HAREWOOD FARM**

TEST VALLEY LOCAL PLAN 2040 – REGULATION 18 STAGE 2 REPRESENTATIONS  
PROJECT NO. 51089

**PREPARED BY:**

KATHERINE MILES BA (HONS) MSC  
DIRECTOR

**DATE:**

APRIL 2024

**PRO VISION**

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## 1.0 Introduction

- 1.1 These representations have been prepared by Pro Vision on behalf of our client, Raymond Farming Ltd, and comprises our formal representations to the Draft Test Valley Borough Local Plan 2020-2040 Regulation 18 (Stage 2) Consultation ('eLP').
- 1.2 Raymond Farming Ltd is promoting land in the company's ownership, at Harewood Farm, Andover. Our client welcomes the opportunity to be involved in the preparation of the Local Plan Update and it is within this context that they wish to make representations to the draft Local Plan.
- 1.3 In our representations to the Regulation 18 Stage 1 consultation, we highlighted the importance of recognising this existing employment site by allocating it within the emerging Local Plan. We also promoted land for housing between the existing settlement edge of Andover and the existing Harewood Commercial site. Neither suggestion has been taken forward in the Stage 2 Consultation for the eLP.
- 1.4 We consider there is a need for rural employment sites in the Borough, and that the Regulation 18b consultation fails to make sufficient provision. There are economic benefits of allocating the Harewood Commercial site including:
- Contributing to the need for industrial floorspace in the Borough;
  - Supporting the continued expansion of an existing rural business in an accessible location;
  - Creation of additional local job opportunities, including in construction.
- 1.5 Our representation therefore seeks to justify why the eLP is currently unsound, and why Harewood Farm should be included in the eLP as an allocated employment site.
- 1.6 In addition, we consider that the plan period fails to accord with national planning policy, and that there is justification to increase the housing requirement to meet needs. We consider that modifications to the eLP are required to address current deficiencies, and to bring the plan into line with national policy. We consider the evidence base does not support the sites selected for allocation and that the land at Harewood Farm is preferential for residential development than proposed allocations as evidenced by the Sustainability Assessment.
- 1.7 Our client wishes to work collaboratively with the Council with the aim of securing the sustainable development at the Harewood Farm sites to meet both housing and employment



needs, through allocations within the eLP. To be clear, whilst our client is promoting both sites, it is quite feasible for either, or both, to come forward to meet needs.

- 1.8 These representations have been prepared in recognition of prevailing planning policy and guidance, particularly the National Planning Policy Framework ('The Framework') (December 2023) and Planning Practice Guidance ('PPG'). In particular, having regard to Paragraph 230 of the December 2023 Framework, it is noted that the Local Plan will be examined against the test of soundness set out in Paragraph 35. Whilst, at this stage, we consider that the Draft Local Plan 2040 is unsound, we have provided some recommendations to ensure that the Plan is made more robust.

## 2.0 Plan Period

- 2.1 The proposed plan period is 2020 – 2040. Paragraph 1.40 of the Regulation 18 Consultation recognises that *“National planning policy is clear that the Council needs to look ahead over a minimum of 15 years from the date of adoption of the plan. We plan to submit the draft Local Plan 2040 in Quarter 2 of 2025. Reflecting the Government’s continued aim of Local Planning Authorities having up to date plans in place, we are seeking to get the Local Plan 2040 adopted earlier than that set out in the Local Development Scheme.”*
- 2.2 It is not explained anywhere how the Council is *“seeking to get the Local Plan 2040 adopted earlier than that set out in the Local Development Scheme”*. The statement may hold some weight if this consultation was taking place in advance of schedule, however, the LDS referred to was published in November 2023, just two months before the commencement of this Regulation 18 Stage 2 consultation, which is taking place on schedule. The LDS envisages that Adoption of the plan will be Q2 of 2026.
- 2.3 Paragraph 1.56 of the eLP states that *“We will be consulting on our Local Plan 2040 Regulation 19 by the end of Q1 2025”*. This is consistent with the recently published LDS. There is therefore no evidence to support the contention that the Council will be able to adopt the Local Plan sooner than envisaged by the LDS.
- 2.4 Therefore, as currently prepared, the Regulation 18 eLP fails to accord with the National Planning Policy Framework at Paragraph 22 which requires *“Strategic policies should look ahead over a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”*. We consider the Plan Period should be revised to at least 2041 to ensure the minimum 15-year requirement is met in line with the Framework. Without this amendment, the eLP cannot be deemed *“positively prepared”* as required by Paragraph 35 of the Framework.

### 3.0 Housing Need

- 3.1 The eLP proposes a total of 11,000 homes across the 20-year plan period (at 550dpa), which is apportioned as 6,270 homes (313<sup>1</sup> dpa) in Northern Test Valley ('NTV') and 4,730 homes (237<sup>2</sup> dpa) in Southern Test Valley ('STV'). After allowing for completions within the plan period<sup>3</sup> the eLP indicates the remaining requirement to be allocated within the plan-period to be 3,875 homes in NTV and 1,562 homes in STV. The proposed 5 strategic sites in NTV would account for 3,790 homes (within the Plan period). Therefore, 97.8% of the remaining total requirement for NTV is therefore planned to be provided as allocations<sup>4</sup>.
- 3.2 While the requirement for 11,000 homes complies with the Standard Method output for Local Housing Need ('LHN') in the Borough, including taking into account 2023 affordability adjustments, the Council have overlooked reasonable adjustments for elements of additional need which may otherwise remain unmet by the eLP.
- 3.3 The Council's [2022 SHMA](#) by JGC Consulting (NB – this document is not in the [Evidence Base](#) and should be) suggests a need for 652 affordable homes per annum, of which 437dpa should be rented and 215dpa should be affordable home ownership<sup>5</sup>. It appears that the caveat in this document<sup>6</sup> that "*caution should be exercised in trying to make a direct link between affordable need and planned delivery*" has been used in the Sustainability Assessment, and the eLP, as justification to not consider the effects of delivery of more than 550dpa within the borough. This is unsound – the purpose of the Sustainability Assessment should be to test whether a higher annual requirement can be achieved, and the implications and benefits of this.
- 3.4 Figure 5.18 of the SHMA indicates that, once estimates of those in need currently in assisted accommodation are discounted there is an "*affordable need for 292 homes per annum*". We consider that there should at least be an attempt to quantify affordable housing need in the Borough, and then consider whether a higher housing target can be accommodated. This is because the latest information from the "House price to workplace-based earnings ratio"<sup>7</sup>

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<sup>1</sup> 6270/20 = 313.5

<sup>2</sup> 4730/20 = 236.5

<sup>3</sup> 2,395 within Northern Test Valley and 3,168 within Southern Test Valley

<sup>4</sup> (3790/3875)\*100 = 97.8

<sup>5</sup> ie shared equity

<sup>6</sup> Expressed at para 5.66 and elsewhere

<sup>7</sup> from Table 5c in [22 March 2023](#) edition of dataset - from [this webpage](#) – this is the link provided within Step 2 of the Need Calculation on [Housing and economic needs assessment guidance page](#)

indicates that median affordability within the Borough during the plan period<sup>8</sup> has risen from 8.76 in 2011 to 10.91 in 2022. This means the average property in the Borough is now nearly 11x the average household income, and this has substantially worsened in the period of the adopted plan. For Test Valley, this worsening represents a 24%<sup>9</sup> increase above the 8.76 level of 2011, compared with a 16%<sup>10</sup> increase in the wider South East over the same period.

- 3.5 If the requirement for 292 affordable dpa is taken from the SHMA at face value, this would equate to an annual requirement for at least 730dpa. This would suggest that the Council should be planning for at least 14,600 homes, split 8,920 in NTV and 5,680 in STV (maintaining the proportions of the eLP).
- 3.6 It is worth noting that within Table 1 of the [Duty to Co-operate Topic Paper](#), Southampton City Council are recorded as having recommended that TVBC “*test a higher amount of housing than the Local Housing Need through the Sustainability Appraisal.*”
- 3.7 After allowing for completions within the current plan period<sup>11</sup>, the evidence on affordable housing need indicates the remaining total requirement across the plan period should be increased to at least 6,525 homes in NTV<sup>12</sup> (from the current allocations for 3,790 homes)<sup>13</sup>. Likewise, provision should be increased to at least 2,512 homes in STV<sup>14</sup> (from the current allocations for 1,644 homes)<sup>15</sup>.
- 3.8 Paragraphs 60, 61 and 63 of the Framework state:
- *“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.”(Our emphasis)*
  - *“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national*

<sup>8</sup> from Table 5c in [22 March 2023](#) edition of dataset - from [this webpage](#) – this is the link provided within Step 2 of the Need Calculation on [Housing and economic needs assessment guidance page](#)

<sup>9</sup>  $100 - ((10.91/8.76) \times 100) = 24$

<sup>10</sup>  $100 - ((9.41/8.07) \times 100) = 16$

<sup>11</sup> Taking the 2,395 completions within NTV and 3,168 within STV of eLP Table 3.3 at face value

<sup>12</sup>  $8,920 - 2,395 = 6,525$

<sup>13</sup> An increase of 2,735 homes

<sup>14</sup>  $5,680 - 3,168 = 2,512$

<sup>15</sup> An increase of 868 homes

*planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below)...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.”*

*(Our emphasis)*

- *“Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to) those who require affordable housing; families with children; older people (including those who require retirement housing, housing-with-care and care homes); students; people with disabilities; service families; travellers; people who rent their homes and people wishing to commission or build their own homes.” (Our emphasis)*

3.9 We consider that to be consistent with the Framework, allocations to address the affordable housing need for at least 292dpa should be accommodated within the plan, which necessitates an uplift to the housing requirement.

3.10 In section 2 we discussed that the Plan Period will fail to accord with Paragraph 22 of the Framework given that adoption is not anticipated until Q2 of 2026 at the earliest. Extending the plan period to 2041 at our suggested 730dpa minimum would bring the total housing need for the plan period to 15,330 homes<sup>16</sup>, an increase of 4,330 homes over the current planned provision (to 2040) of 11,000 homes.

3.11 If the plan period were extended by 2 years (to 2042), again at our suggested 730dpa minimum would bring the total number of homes needed (to 2042) to 16,060 homes<sup>17</sup>, an increase of 5,060 homes over the current planned provision (to 2040) of 11,000 homes.

3.12 However, as the eLP includes significant allocations, we question whether it would in fact be necessary to extend the plan period further to account for shortfalls in delivery arising from these allocations and to identify suitable broad locations for growth.

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<sup>16</sup> 730 x 21 (for a 21-year plan 2020-2041)

<sup>17</sup> 730 x 22 (for a 22-year plan 2020-2042)

## 4.0 Meeting the housing needs

4.1 As discussed above, the eLP suggests that the residual housing requirement for Northern Test Valley is 3,875 homes. This is proposed to be met by 5 strategic allocations, 3 of which are in Andover. These are:

Site	Number of Homes
Land South of London Road, East Andover	90
Land at Manor Farm, North of Saxon Way, North Andover	800
Land at Bere Hill, South East Andover	1400
Land East of Ludgershall	350
Land South East of Ludgershall	1150
	<b>= 3790</b>

4.2 The eLP is supported by an Interim Sustainability Assessment (SA). However, as discussed above, we consider the SA is deficient as it has failed to consider and test a higher housing need to address the need for affordable housing.

4.3 There are however further deficiencies in terms of the proposed site allocations. The area of the Manor Farm site in the SA is c154ha and this does not align with draft allocation (boundary on [pg76 of the plan](#) = 67ha). Accordingly, the Manor Farm allocation may have unduly benefitted in the SA from elements being included that are actually outside the extent of the allocation. Also, the Bere Hill allocation (1,400 homes) was assessed as 3 separate SHELAA parcels (sites 419, 167 and 247) and appears not to have been assessed as a whole. In contrast, other sites appear to have been assessed individually, as well as being assessed collectively.

4.4 Unusually, the SA that accompanies the eLP does not include a summary of the site-specific assessments. We have therefore necessarily had to review the contents of each site individually. Assigning a notional +5 score to SA attributes assessed as “+ +”; +2 scores to those assessed as “+”; -2 scores to those assessed as “-”; and -5 scores to those assessed as “- -” (and 0 to other attributes); enables a means for a site-by-site comparison.

4.5 The draft allocations within NTV are summarised below using this methodology – taking the contents of the SA *at face value* i.e. we have not adjusted the scores/conclusions of the SA, we have only assigned a consistent value for comparison. The column “Net Score” is the sum of the SA assessment points, while the column “Rank” indicates the order of all the sites within

the SA that were promoted in NTV for 200 or more dwellings (1 being the site with the highest “Net Score”). The coloured columns are a tally of the SA assessment attributes for each site.

SHELAA Ref	Site Name	NET SCORE	RANK	++	+	+/-	0	?	-	--
173	Land at Manor Farm	16	8	4	9	10	2	2	6	2
419	Land at Bailliffs Bottom	42	2	6	11	5	5	3	5	0
167	Land at Bere Hill	53	1	9	9	5	5	2	5	0
247	Land at Bere Hill Farm	21	6	5	8	5	5	2	10	0
324	Land south of A342 and east of Shoddesden Lane	5	10	3	5	12	5	0	10	0
61	Land east of Ludgershall	31	5	5	9	7	7	1	6	0

- 4.6 Using this same method, a number of sites that have not been included as allocations score more favourably than those that have. Two in particular are highlighted below, again based on unchallenged SA scorings.

SHELAA Ref	Site Name	NET SCORE	RANK	++	+	+/-	0	?	-	--
165	Land at Finkley Down Farm	39	3	9	4	10	3	2	7	0
322	Land at Harewood Farm	32	4	6	7	8	6	2	6	0

- 4.7 What is therefore clearly apparent is that Site 247, which is to the west of Bere Hill scores worse and is ranked lower than our clients land at Harewood Farm. In other words, it would be more sustainable to allocate our clients' land over Site 247.

- 4.8 Further, the Land at Finkley Down Farm, which lies to the northeast of Andover has not been selected for allocation, despite clearly scoring higher, and being ranked lower than the proposed allocation at Manor Farm. In fact, both Harewood Farm and Finkley Down Farm score better than the proposed allocation at Manor Farm. The basis for allocating Manor Farm over these two sites is therefore unsound, and the SA does not support the allocation of that site.
- 4.9 Our clients land at Harewood Farm, together with the land at Finkley Down Farm are clearly preferential allocations using the SA assessment. These 2 sites could provide at least 1,100 units<sup>18</sup> and are both preferable, *at face value* (i.e. on the basis of the LPA assessment in the SA, unchallenged), to the two proposed Andover allocations in SS6 totaling 1,400 units<sup>19</sup>:
- Manor Farm (SHELAA 173, allocated for 800 houses); and
  - The southernmost part of the Bere Hill allocation (SHELAA 247, allocated for 600 houses of the total 1,400 at Bere Hill).
- 4.10 Thus, the SA provides clear evidence that sites which are more sustainable have been passed over in favour of less sustainable sites which are proposed for allocation in Draft Policy SS6. As such, the eLP is demonstrably flawed in its site selection methodology.
- 4.11 The conclusion should be clear, the allocation of SHELAA Site 173, Land at Manor Farm, is unsound and unsupported by the evidence base. It should be removed from the eLP. The allocation of SHELAA Site 247 is unsound and unsupported by the evidence base and it should be removed from the eLP. Instead, our clients land at Harewood Farm (SHELAA Site 322) and another site at Finkley Down Farm (SHELAA Site 165), should be allocated instead.
- 4.12 Notwithstanding the above, we have also indicated that the plan period should be extended by at least 1 year to 2041, but perhaps even 2042. This would mean an additional requirement for 1,100 homes to 2042. This further justifies the need for our clients site at Harewood Farm, which has been promoted for circa 200 homes and directly adjoins the settlement edge of Andover.

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<sup>18</sup> SHELAA 165 is promoted for 1400 dwellings but assessed by the LPA as having a capacity for 900units; SHELAA 322 is promoted for 200 units

<sup>19</sup> As well as being preferable to both Ludgershall allocations



4.13 In addition, we have indicated that the housing requirement (for the current eLP plan period) should be increased to at least 6,525 homes in NTV from 3,875 currently. Therefore there is a clear case for the allocation of our clients land at Harewood Farm which can come forward swiftly to meet local housing needs.

## 5.0 Economic Need and Supply

### 5.1 Paragraph 85 of the Framework states:

*“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”*

5.2 The eLP recognises that *“a strong and robust local economy in Test Valley” ... “is key to delivering prosperity and quality of life”<sup>20</sup>*. It refers to *“The Borough is easily accessible by both road and rail to: London, the West Country, the Midlands and the south coast. This makes it an attractive location for businesses wishing to take advantage of this and access to these wider regional markets”<sup>21</sup>*. Paragraph 3.106 recognises that *“The Borough has experienced significant employment and business growth in recent years”* and that *“This is an indicator of confidence in the local economy and that of continued economic growth.”* Finally, Paragraph 3.108 recognises that there are *“increases in smaller businesses leading to a need for smaller and more flexible accommodation”*.

5.3 Yet despite these positive statements, the eLP fails to recognise Harewood Farm as an employment site.

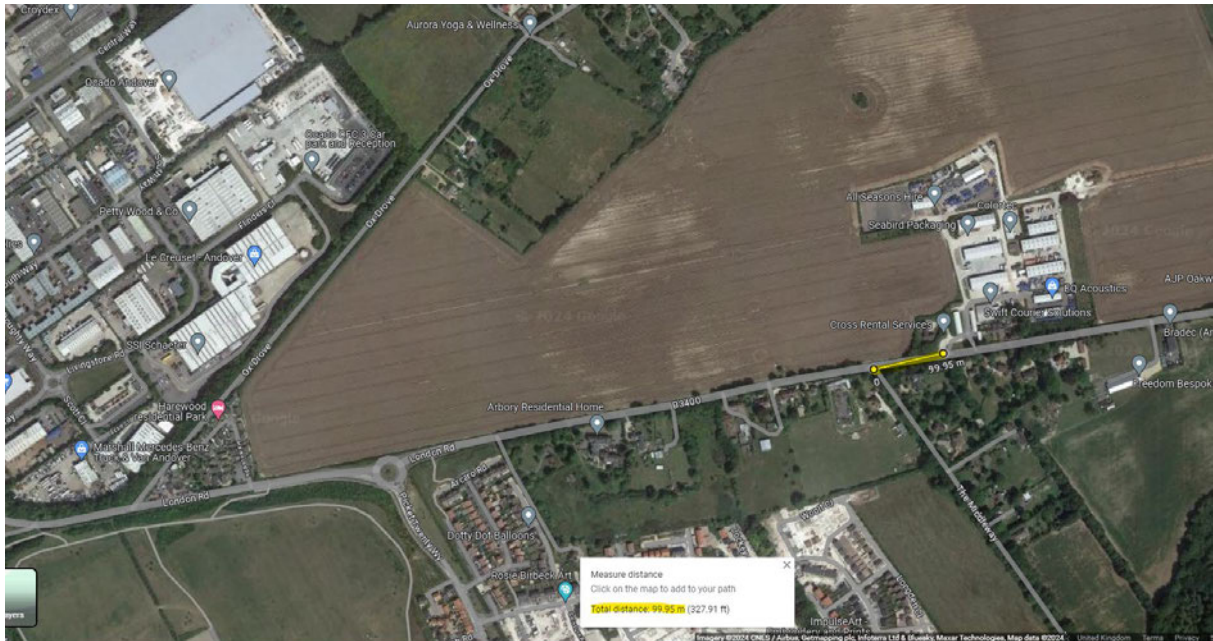
5.4 Harewood Farm is located just under 100m from the edge of the Andover Settlement Boundary and the proposed allocation of 90 homes south of London Road. It is just 550m from the edge of the settlement boundary to the north of London Road. The close proximity of this existing commercial site to the Settlement of Andover is shown in the screenshot below.

5.5 Harewood Farm is currently home to over 11 existing businesses employing around 75 staff. There is constant demand for the premises that are offered here and at present demand is outstripping supply. There is an urgent need for the expansion of the Harewood commercial site. Previous applications for expansion of this commercial site have been supported by the Council under Policy COM2 and LE17 of the Adopted Local Plan.

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<sup>20</sup> Paragraph 3.103

<sup>21</sup> Paragraph 3.105



5.6 Given the proximity of Harewood Farm to the settlement, together with the evidence of existing demand and need for continue expansion at the site, we request the Council show support for this existing employment site through its allocation within the eLP thereby recognising the vital role that this site plays in providing economic benefits to Andover, and the Test Valley Borough as a whole.

5.7 Specifically in terms of the need for employment land, the Duty to Cooperate Topic Paper on the strategic matter of employment refers to the Partnership for South Hampshire ('PfSH') study and to *"Helping to meet employment needs across North and South Hampshire"*. The PfSH Study referred to is the Economic, Employment and Commercial Needs (including logistics) Study March 2021. This does not appear in the evidence base, but in our opinion should be as there are several important considerations that can be taken from it:

- The Industrial Market – Paragraph 5.59 and 5.60 note: *"South Hampshire (including all of Test Valley) delivered 417,000 sqm of new industrial space and lost only 251,000 square metres. ... On examination two points emerge. Firstly, the fact that Test Valley contributed 137,000 sqm of this gain. This is largely a new generation of Strategic Warehouses in Andover – away from the South Hampshire Urban market. These have been attracted to Andover given its location of the A303 and ability to service the M3 and A303 regional logistics markets. As we discuss elsewhere the Andover logistics market is very different to South Hampshire. The South Hampshire area lacks a 360 degree catchment for logistics.*

- Concluding on the Industrial market, the PfSH study states at Para 5.79 that *“For most of the 2011- 21 period the industrial floorspace market was growing in Test Valley – due to warehouses – but stable or declining in the urban part of South Hampshire. Recent data shows this decline reversed in the last few years and the market is now growing – to what extent the market has moved beyond the 2016 ‘growth’ expectations and into the contingency allowance is hard to confirm. But employment is growing – as is the stock.”*
- Section 10 turns to Strategic Warehouses, and states at Paragraph 10.2 *“For Test Valley the new generation of strategic warehouses in Andover are captured in our trend analysis and, in essence because we suggest using a 5 year trend projection for the industrial uses, we assume that these repeat over a new plan period every 5 years.”*
- Paragraph 10.14 states: *“In this context, feedback from our market engagement suggested that provision be made in the region for limited number of strategic warehousing sites – perhaps up to 5 throughout the region, each of 8-10 hectares and adjoining the motorway network. Although the market is, as noted, generally unproven, there is evidence to support that allocated sites are taken up. Andover and the A303 is a prominent example of this, with a cluster of transactions over the last 10 years, including:*
  - *Cooperative Group (2011) – 467,000 sq. ft*
  - *Ocado (2014) – 239,000 sq. ft*
  - *West Coast (2016) – 341,000 sq. ft*
- On industrial need, Paragraph 11.30 concludes (for the period 2019-2040): *“So, our recommendation is based on a 5 year past trend projection. This generates a ‘need’ for 670,000 sqm for South Hampshire and 311,000 sqm for Northern Test Valley. Because industrial plot ratios are much more stable with most occupiers / developers working to 40% the planning authorities may find it easier to work with this being expressed in terms of hectares – 168ha / 78ha.”*
- On strategic warehouses, the recommendation of Paragraph 11.33 is that *“to provide additional scope for a new generation of warehouses / logistics users (in the South Hampshire FEMA) we recommend that the planning authorities consider allocating an additional (up to) 5 new sites, in highly accessible locations (to the motorway network) suitable for larger warehouses”,* and Paragraph 11.50 concludes: *“For the North of the district the ‘need’ reflects previous generations of larger scale warehouses. Again there is no certainty that a new generation of sites could be found in Northern Test Valley to accommodate this. In which case the Council will need to work with its FEMA partners to distribute this need. We don’t, in this work, confirm a North Test Valley FEMA. That is a*

*matter for the Council and the EM3 LEP – but we note that the logistics FEMA (logistics drive the need in Northern Test Valley) is likely to extend along the M3 / A303 corridor and so may require joint working with Councils east and west of the district.”*

5.8 Table 2 of the Duty to Cooperate Topic Paper states that *“There is no unmet need from neighbouring authorities in South Hampshire that requires consideration. Although meeting the need for B8 warehousing across southern Test Valley and South Hampshire will be a challenge due to availability of sites. The Council will be undertaking a further ‘call for sites’ alongside the LP 2040 consultation.”* This conclusion is clearly at odd with the evidence referred to above.

5.9 The Test Valley Employment Needs Further Analysis Study by DLP Planning in July 2023 identifies in Table 92 that the ‘Total Employment Land Needs (ha) – Growth Scenario (Alternative Distribution)’ is as follows:

B1a/b – 14.9 ha

B1c/B2 – 17.0 ha

B8 – 39.8 ha

**Total – 71.7 ha**

5.10 Table 95 – Components of Recommended Scenario Total Gross Employment Land Needs – states:

- Northern Test Valley

B1a/b = 6.9 ha (27,665 sqm)

B1c/B2 = 10.5 ha (41,999 sqm)

B8 = 13.9 ha (55,515 sqm)

Total = 31.3 ha (125,180 sqm)

- Southern Test Valley

B1a/b = 7.9 ha (31,778 sqm)

B1c/B2 = 6.5 ha (26,099 sqm)

B8 = 25.9 ha (103,596 sqm)

Total = 40.4 ha (161,473 sqm)

- 5.11 Table 96 – Components and Output of Supply/Demand Balance by Sub-Area (April 2022) recognises that in NTV there is a slight over-supply of 2.2ha (8,867sqm) whereas in STV there is an under supply in the B8 sector of -25.4 ha (-101,591 sqm). *When aggregated with other B Class uses, the net undersupply in STV is -12.0 ha (-47,956 sqm).*
- 5.12 Paragraph 14.37 recognises that implementing the recommendations of the supply/demand balance on the basis of sub-area geographies should be treated indicatively rather than a strict guide as to where additional provision might most suitably be located. It states *“While the Growth Scenario distribution indicates some focusing of demand in STV this does not correspond to a conclusion that future needs should be tightly contained within sub-area geographies.”*. Hence the report is suggesting, as is confirmed by Paragraph 14.38 that ***“The deficit in the supply/demand balance for B8 uses is at least in-part a function of the very limited existing pipeline within STV. On this basis it would be reasonable to view additions to the pipeline within either NTV or STV as an appropriate approach to provide a balanced approach towards meeting demand and making provision for overall needs in Test Valley.”*** The report continues at 14.39:
- “For the same reasons, additions to the pipeline in NTV where the overall supply/demand balance is closely aligned would provide further choice and flexibility. Maintaining the overall supply/demand balance within NTV from the existing pipeline will be dependent on timing of delivery and the qualitative characteristics and flexibility of supply to meet alternative patterns of demand given the negligible overall surplus. Broadly speaking additional provision for a mix of employment (including Use Class B8) that could contribute towards the 14.2ha component of the deficit in STV would maintain a balance of overall supply in the borough and ensure flexibility in NTV itself.”***
- 5.13 The Employment Topic Paper suggests that with existing commitments, there is no requirement to allocate additional sites in NTV beyond the allocation of the Thruxton Aerodrome site which is covered by draft Policy SS8.
- 5.14 We note that there is an error in the labelling of Table 2 within the Employment Land Topic Paper, which suggests that the shortfall of 25.4ha of B8 land is within NTV.

Table 2: Employment Supply 2020-2040

	Northern Test Valley			Southern Test Valley		
	B1a/B1b	B1c/B2	B8	B1a/B1b	B1c/B2	B8
Total Need	7.9	6.5	25.9	6.9	10.5	13.9
Net Completions 2020-2022	1.9	1.9	0.4	0.4	0.8	0.5
Supply	11.4	12.7	0.1	7.0	11.4	13.4
Residual	5.3	8.1	-25.4	0.5	1.7	0.0

- 5.15 Despite the Council’s Employment land evidence recognising that *“additions to the pipeline in NTV where the overall supply/demand balance is closely aligned would provide further choice and flexibility”* and can adjust for the shortfall in STV, Paragraph 6.14 of the Employment Topic Paper simply states: *“We are proposing to meet the need for warehousing and logistics as far as practicable but there remains a shortfall in Class B8 warehousing use. It is a challenge to meet this need, particularly for large scale Class B8, given the availability of sustainability sites. This is the case across South Hampshire as a whole, and for which some of this will be a sub-regional need. We are undertaking a further ‘call for sites’ alongside public consultation on the Local Plan to seek any further potential suitable sites for Class B8 use. The position will be reviewed for Regulation 19.”*
- 5.16 So in essence, the Council has disregarded Harewood Farm, which is an established employment site on the edge of Andover providing home to 11 businesses and approximately 75 staff, because it is in NTV despite the Council’s own employment land evidence recognising that sites in NTV can assist in meeting the shortfall in STV.
- 5.17 The eLP in this regard also disregards the Sustainability Appraisal, which states:
- Paragraph 1.23 – The quantum and distribution of employment land should be informed by employment land projections, the local economic strategy and growth aspirations for the area informed by market evidence. **Although the projections identify no additional land requirement in the north of the plan area, local growth aspirations, market interest and take up rates point to the potential benefit and opportunity in providing for additional employment land provision in the north. This would also assist in establishing a more balanced spatial and economic strategy that is not only focussed on the south of the plan area.** Ongoing discussions are being undertaken with neighbouring authorities and PFSH

regarding cross border strategic matters. The DLP study is accepted as the latest and best available evidence and there is no request from the PFSH authorities to provide for a level of employment land in excess of the DLP projections. **The only request from a local authority to accommodate unmet employment land need has been from West Berkshire, however there is no functional market relationship between West Berkshire and the northern Test Valley FEMA.** No request has been made to accommodate unmet employment land need from neighbouring authorities (including the South Hampshire PFSH authorities).

- Paragraph 1.25 – **Consistent with the local economic strategy, growth aspirations and market interest there is a clear benefit and opportunity in providing additional employment land in the north of the plan area.** It is considered that a single new strategic allocation may be required.
- Paragraph 1.26 – **Consistent with the emerging spatial strategy and settlement hierarchy new strategic employment development should be located to relate well to Andover and key locational factors such as connectivity to the strategic road network. This will include consideration of site options in Andover and the surrounding area taking account of options to expand and or redevelop existing business parks.**

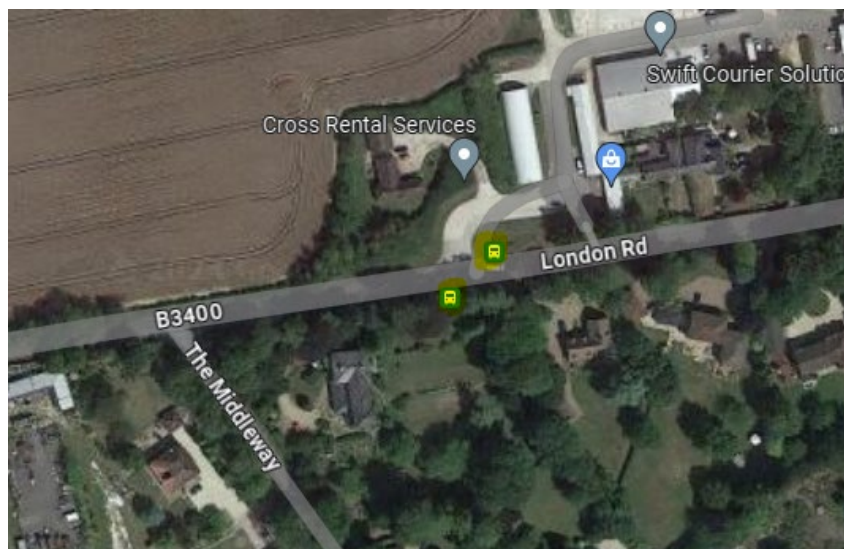
5.18 Despite the overall conclusions of the SHELAA finding that Site 379 Harewood Farm: *“Part of the site is grade 3a agricultural land and the remainder is unclassified. Potential landscape impact will need to be considered further (in addition to adjacent SHELAA housing sites). The site contains existing employment and commercial development and **an intensification of the site with an additional 15,000sqm of employment development could be appropriate subject to landscape impact and transport assessment.** Part of the site along the eastern and southern boundary is within a LEN opportunity area and there is potential for this area to be retained to deliver enhancements to the LEN.”*

5.19 Appendix 2 of the Test Valley Employment Needs Further Analysis Study includes a site assessment for Harewood Farm. It is assumed that the author failed to visit the site or research its history as the answer to Q1.2 *“Has there been any recent development activity, within the last 5 years?”* is no, which is incorrect. Notwithstanding, the assessment concluded *“If it is possible for this site to be utilized for employment use, subject to planning permission overcoming the relevant constraints, this site may be managed for employment use”*. The site is already being *“utilised for employment use”*. The eLP provides the opportunity to recognise



this, and to allocate the site as an employment site thereby “*overcoming the relevant constraints*” which are the current policies of the Development Plan.

- 5.20 The SA Appendix V Employment Site Appraisals are not prepared in the same way as the Housing sites and the scoring is not included. This is extremely unhelpful for any consultee.
- 5.21 We note with interest that Harewood Forest (at Longparish and to the south of Andover off the A303) is an existing employment site and is retained as such in the eLP. This site is over 3.5km from Andover and, unlike Harewood Farm, is not on a bus route. Yet Harewood Forest has been recognised for its importance as an employment site and is allocated as such.
- 5.22 Nowhere in the evidence base can be find explanation as to why Harewood Farm, which was taken right through the Stage 5 assessment of the SA and was not identified as having any significant constraints (i.e. constraints which could not be addressed by a change of policy, good design and mitigation), has been discounted and not taken forward for allocation when there is a clear shortfall in B8 floorspace within the Borough and recognition that sites in NTV at Andover can assist in meeting this need. The eLP is, as a result, unsound.
- 5.23 Whilst we consider that the Harewood Farm site should be allocated as an employment site, we have significant concerns regarding the proposed drafting of Policy EC3 of the eLP. Although Harewood Farm should not in our view be regarded as a rural location given it lies just 100m from the Settlement and has a bus stop<sup>22</sup> directly outside the site entrance, it is treated as a rural site for the purposes of Development Management.



<sup>22</sup> These bus stops are served by bus services 76 and C4. The 76 bus provides a frequent (half hourly) service between Andover train station and Basingstoke making it an attractive service.

5.24 The supporting text to Draft Policy EC3 refers to the policy enabling *“employment development and rural diversification on existing employment sites in the countryside, where appropriate”*. Reference is also made to the Framework, and Paragraph 88 which requires that *“Planning policies and decisions should enable: a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed, beautiful new buildings”*.

5.25 Importantly, Paragraph 89 of the Framework states:

*“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”*

5.26 However, not only has the Council failed to recognise Harewood Farm as an important site which is contributing to the local economy, but it has drafted Policy EC3 such that it would preclude any further development at this site. This is because Policy EC3 states that new development *“...will be permitted provided that: a) it is contained within the lawful employment site”*.

5.27 In order to meet the demand for floorspace at Harewood Farm, it is necessary to extend beyond the current boundaries of the site, and as such at previous Regulation 18 consultation, we responded to the call for sites and promoted land to the west and north of the current Harewood Farm site for allocation. We maintain that Harewood Farm is an appropriate location for employment development and should be supported via an allocation.

5.28 At the very least, Policy EC3 of the eLP should be amended to allow for the expansion of existing employment sites such as Harewood. We draw attention to Paragraph 6.92 of the Adopted Local Plan which, in the context of Policy LE17 and allowing the expansion of employment sites in the countryside, states *“Proposal which involve the extension of the site*

*boundary into the countryside would be considered on their individual merits". This statement is omitted from the eLP. However, it has provided a useful statement to allow for the expansion of Harewood Farm. For example, in the Planning Policy team comments set out within the Committee report prepared in respect of application 15/01974/FULLN in 2016 it was stated:*

- The site is currently in agricultural use, although is adjoined by existing employment development and an extant planning permission (12/02366/FULLN) for employment use. Consideration of the development as both the replacement of existing agricultural building by new buildings for employment (albeit on a different footprint), and as the extension of an existing employment site in the countryside with new building, but outside the existing curtilage into undeveloped countryside and which is deemed of a significant size, are relevant factors.*
- The proposal is therefore outside the scope of development provided for by (and therefore contrary to Policy LE16 and LE17). However, the supporting text of Policy LE17 indicates that such proposals as has been put forward will be considered on their merits. The planning history to allow employment use, both for redevelopment and expansion (07/03523/FULLN, 11/02207/FULLN and 12/02366/FULLN) is a material consideration, which points towards the proposal being considered favourably.*

5.29 The Council's policy team and its current Adopted Local Plan have therefore allowed for the expansion of this site, yet its emerging Local Plan fails to do so. This is inconsistent with national planning policy and will be a significant threat to the local economy in failing to provide an opportunity for an existing employment site to grow. The eLP as drafted is therefore unsound and should be modified to:

- Allocate Harewood Farm as an employment site; and
- Amend draft Policy EC3 to allow for the expansion of existing employment sites beyond their boundaries where proposals are considered on their individual merits.

## 6.0 Amendments Required to Achieve Soundness

6.1 In order to make the plan “sound”, it is considered that the Council need to undertake **all** of the following:

- Increase the annual requirement from 550dpa to at least 730dpa to ensure an adequate minimum supply of Affordable Housing to meet future needs (292dpa), allowing for the 40% requirement of HOU1(a); **and**
- Extend the Plan period to at least 2041 to comply with the minimum requirement for a plan period to cover 15-years from adoption as required by Paragraph 22 of the Framework, and accommodate the intended adoption date taken from the recently agreed Local Development Scheme of Q2 2026. This plan-period would need to be extended further if:
  - a) The plan is not adopted until 2027 (in line with past performance in the Borough); and
  - b) The allocations at Andover are considered to be a “significant extension” to Andover i.e. where the plan should look ahead over 30 years; **and**
- Allocate land at Harewood Farm (SHELAA Site 322) for development instead of SHELAA Site 167 (Land at Bere Hill) as Site 322 is a more sustainable location for development than that part of the proposed allocation, by reference to the Council’s own scoring within the Sustainability Assessment; **and**
- Allocate Harewood Farm (SHELAA Site 379) as an employment site; and
- Amend draft Policy EC3 to allow for the expansion of existing employment sites beyond their boundaries where proposals are considered on their individual merits.