

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

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Test Valley Borough Council
Beech Hurst
Weyhill Road
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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)	Miss	First Name*	Alice
Surname*	Drew		
Organisation* (If responding on behalf of an organisation)	Southern Planning Practice		

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:

Mr Stephen Brown

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
<p>Please see submitted representations.</p>

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 see submitted representations.</p>

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.

Land at Motley Mill, Weyhill

[Representations to Test](#)
[Valley Borough Council Local](#)
[Plan Regulation 18 Stage 2](#)

**Alice Drew BSc (Hons) MSc
MRTPI**



Client: Mr Stephen Brown

Date: March 2024

Ref: TV-845-AD

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1.0 [Introduction](#)

- 1.1 These representations have been prepared by Southern Planning Practice Ltd on behalf of Mr Stephen Brown, who owns the land at Motley Mill, in response to the current Test Valley Local Plan Regulation 18 Stage 2 Consultation.
- 1.2 Our client owns two sites within Test Valley Borough which are suitable for development over the plan period, these are as follows:
- Land at Motley Mill; and
 - Land south of Harrow Way.
- 1.3 The above sites within our client's ownership are both small to medium sized which would provide an immediate, important contribution to Test Valley Borough's housing need over the plan period. The land south of Harrow Way is being promoted separately and these representations will focus solely on the land at Motley Mill.
- 1.4 The site is located immediately to the north of the A342 in the eastern section of the settlement of Weyhill. Weyhill is located approximately 1km to the west of Andover, one of the two main settlements within the Borough. The site comprises a light industrial building located in the north eastern section of the site with a large area of hardstanding for the parking of cars and heavy good vehicles. The existing built form on the area occupies approximately 40% of the site. The remainder of the site is maintained grassland. Section 4 of these representations provides further details on the site and its suitability for allocation for residential development in the emerging Local Plan.
- 1.5 The site has not been previously promoted to the council; however, the site is available, suitable, achievable and deliverable and would help to meet Test Valley's housing need in a sustainable way whilst also providing benefits to the local community and the District's economy.
- 1.6 These representations will respond to the Local Plan Regulation 18 Stage 2 Consultation and will also present the opportunity which the land at Motley Mill provides.
- 1.7 Submitted together with these representations is a site location plan which details the location and extent of the land at Motley Mill

2.0 [Response to Spatial Strategy](#)

- 2.1 We support the settlement hierarchy set out within Policy SSI of the Draft Local Plan and support the primary focus of growth to be within the two tier 1 settlements; Andover and Romsey, where historically previous growth has also been focused. We also support the settlement hierarchy in Policy SSI identifying Weyhill as a tier 3 settlement, however we would suggest that the settlements within this tier should be ranked in detail as we consider Weyhill to be more sustainable than many others in this tier. Such ranking would assist in the decision making process to ensure proportionate growth is being directed to the most sustainable settlements in the Borough.
- 2.2 We note that in the settlement hierarchy Tier 3 settlements are to be considered 'non-strategic' as there is no provision made for strategic allocations within these settlements. However, we encourage the Council to support proportionate growth in smaller settlements and sustainable rural areas, which may be beyond the existing settlement boundary, to meet local needs and to support the District's rural economy. Further, Weyhill which is considered to be a Tier 3 settlement, is very well related, both functional and physically, to Andover, a Tier 1 settlement, and as such, we believe that settlement should be ranked as a 'higher' Tier 3 settlement which can accommodate proportional growth in sustainable locations. One such location where new growth could be delivered is the land at Motley Mill in Weyhill which is a partial brownfield site in a highly sustainable and accessible location.
- 2.3 In order to both provide and maintain a robust housing land supply, in addition to focusing growth in the two principal settlements of the Borough, the Council should look to all tier settlements in the hierarchy to deliver homes through a range of small, medium and strategic sites. The land at Motley Mill presents an opportunity for Test Valley to allocate a further small-medium scale partial brownfield site in the emerging Local Plan. Paragraph 70 of the NPPF recognises the important contribution small and medium sized sites can make to meeting the housing requirement of an area as they are often built out relatively quickly. By allocating a range of sites, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements and to ensure Test Valley is not vulnerable to unsustainable, speculative development. Further, with the nature of the site being partially brownfield, it is considered that such a site should be prioritised for development in accordance with the Government's 'brownfield first' approach to new development.

- 2.4 Whilst the land at Motley Mill is located in Weyhill, Map 55 of the Draft Local Plan details that the settlement boundary ends just before and does not include the site. However, we consider that as the site is currently a light industrial site together with the fact that there is residential development immediately to the west of the site, the settlement boundary for Weyhill should be extended to include the site. We would encourage the Council to further review settlement boundaries as part of the next stage of the Local Plan to ensure that the most sustainable sites are being included within the settlement boundaries of the existing settlements.
- 2.5 Policy SS2 of the Draft Local Plan seeks to allow appropriate development in the countryside. Criterion a) of this policy allows development outside of settlement boundaries if the proposed development is allocated or allowed in another policy of the Local Plan. At present, without allocation the land at Motley Mill could be developed for affordable housing, however we believe that the site provides a great opportunity to contribute to Test Valley's Housing Land Supply for a mix of housing types and tenures and therefore believe it should be allocated through the Local Plan for both market and affordable housing.
- 2.6 Section 3.45 of the Draft Local Plan confirms that the Council is committed to creating and maintaining sustainable rural settlements. We support the Council's aim for the spatial strategy and policies to seek to support and enable appropriate development in the rural areas of the Borough to meet local needs whilst ensuring that proposals do not conflict with the policies which aim to respect the environment. Further, as encouraged by the NPPF, brownfield sites should be prioritised for redevelopment.

3.0 [Response to Housing Provision](#)

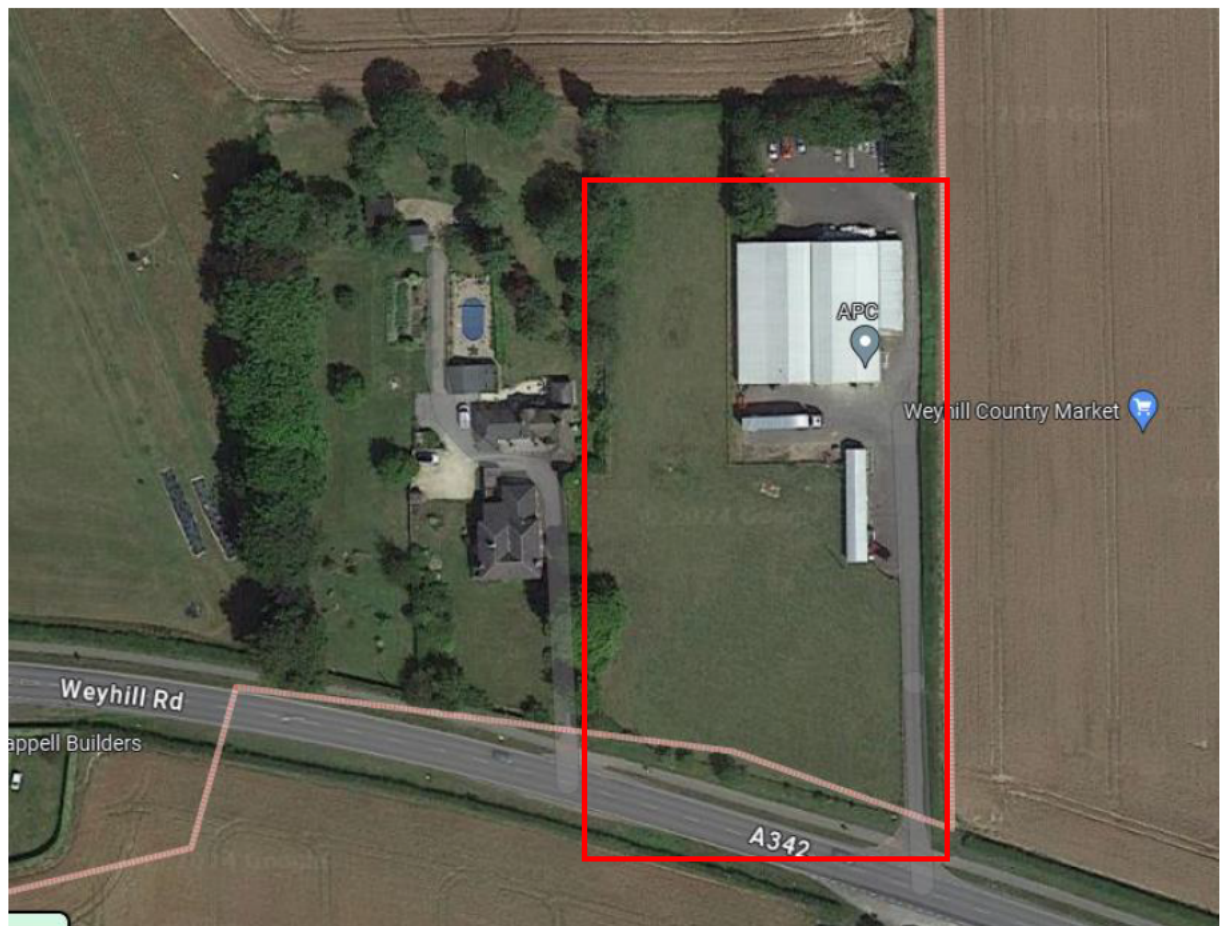
- 3.1 Policy SS3 of the draft Local Plan sets out the Housing requirement for the Borough over the plan period. Table 3.1 sets out that from the period 2020 – 2040 11,000 homes will be provided in the Borough, 6,270 (57%) of this housing provision will be provided in the northern area of Test Valley with a focus on growth in Andover.
- 3.2 The figure of 11,000 homes is indicated as a minimum number of homes to be delivered over the plan period. We are supportive of this minimum figure and encourage the council to be ambitious to allocate a sufficient number and variety of sites to ensure that the Local Plan seek to support the Government's objective of significantly boosting the supply of homes as set out in Paragraph 60 of the NPPF.
- 3.3 Paragraph 3.55 of the Draft Local Plan confirms that to inform the housing requirement of the Borough, two studies have been undertaken and comprise part of the Local Plan's evidence base. These two studies together with the standard method provided by the Government have been used to calculate the housing need over the plan period. Whilst we are supportive of this method, as it is consistent with paragraph 61 of the NPPF which requires strategic policies to be informed by a local housing need assessment when determining the minimum number of homes needed, we believe that the council should be more ambitious with its housing numbers. The council must also look to and ensure that unmet need for neighbouring authorities is being accommodated with the Borough.
- 3.4 As per paragraph 61 of NPPF, the outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area. Further, as per the Planning Practice Guidance (PPG) Paragraph: 001 Reference ID: 68-001-20240205, the standard method for calculating local housing need provides a **minimum** (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the housing requirement in their plan unless exceptional circumstances justify an alternative approach. We do not believe that there are any exceptional circumstances which would justify an alternative approach in Test Valley.
- 3.5 Indeed, in order for the Local Plan Review to meet the 'positively prepared' test of soundness as required by paragraph 35 a) of the NPPF, the Local Plan review must:

“provide (ing) a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development”.

- 3.6 We support the Council’s approach to housing delivery in north and south areas of the Borough and also support the different approaches in each Housing Market Area (HMA) set out in Figure 3.2 of the Draft Local Plan. The housing strategy seeks to ensure that the strategy and delivery of homes is suitable and sustainable to meet identified local needs. The split of homes between the southern and northern areas of the Borough with 57% of the housing requirement being met in the northern area is a decrease of the current split of 67% being provided in this area. We understand that this change in split is due to the change in HMA boundaries and therefore support this. We also support the council’s approach to use HMAs for the purpose of calculating the five-year housing land supply.
- 3.7 Given the variation in location, size and settlements within each HMA, we believe it would be useful for the Local Plan to set out housing need figures for each HMA. Such figures would then ensure a sufficient number of homes were being planned for through allocations in each HMA. It is important to note that some of the HMA’s are much larger in size than others and some of those which are larger have the same number of smaller tier settlements within them. For example, the Penton Grafton HMA which is relatively small includes the settlement of Weyhill which is a Tier 3 settlement whereas the Longparish HMA is much larger and still only includes one Tier 3 settlement. It is therefore important that no matter the size of the HMA, each should be assessed on its own merits and should be allocated proportional growth in order to sustain local services and facilities.
- 3.8 Another pertinent point to note with regards to the proposed site allocations is the impact which the recent mandatory Biodiversity Net Gain (BNG) will have on the capacity of these sites. The requirement for BNG onsite may have a significant impact on the ability for the sites to deliver the number of homes they are allocated for. Therefore, to ensure that the Local Plan can meet the identified housing needs and is positively prepared, the Council need to ensure that the housing numbers each site is proposed to be allocated for is realistic and achievable. It is considered that the Council should also look to further small and medium sized sites to assist in the delivery of the shortfall of homes which may be generated through the BNG requirement. Sites such as the land at Motley Mill are a suitable size to assist in providing the short to medium term boost in housing supply.

4.0 Land at Motley Mill – The Opportunity

- 4.1 The site, land at Motley Mill, is located to the east of Weyhill which is a settlement located to the west of Andover. Whilst the site is located immediately to the east of the settlement of Weyhill, it falls just outside of the Tier 3 settlement boundary. However, as highlighted above, we believe the site should be included within the settlement boundary for Weyhill. The site is located 1km to the east of the Tier 1 settlement of Andover and is accessed directly via Weyhill Road and the A303. It is understood that there are sites being promoted for allocation to the west of Andover and to the north of the A303. Land at Motley Mill is therefore very well located to both existing and proposed residential development.
- 4.2 The site currently comprises a light industrial building located in the north eastern section of the site together with an access from the south and a large area of hardstanding for parking associated with the buildings use. The parking area to the north of the building is very well contained and screened from the surrounding landscape by mature hedgerows. The eastern boundary of the site is also screened from the wider countryside by a well maintained native hedgerow. The remainder of the



site, to the south and west of the light industrial building, is an area of maintained grassland. The site is denoted by the red line on the aerial image below.

- 4.3 The site is accessed directly from Weyhill Road (A342) to the south. To the north, east and south is land in arable agricultural use, whilst to the east lies an existing residential property which is also outside of the settlement boundary for Weyhill.
- 4.4 There are no known environmental, heritage or landscape designations that apply to the site itself. The site is located within flood zone 1 as confirmed by the Environment Agency which means there is a very low risk of flooding from both rivers and the sea. The site is therefore relatively unconstrained and there would be no constraints which would prevent it from being developed for new homes.
- 4.5 The site comprises a rectangular parcel which extends to approximately 0.97 ha and therefore has the capacity to accommodate circa 20-30 homes at a density appropriate to the existing built form and the surrounding area. It is considered that the site could provide the mandatory 10%, or more, BNG on site. One key ecological enhancement would be the provision of new native hedgerow planting along the southern boundary to provide a wildlife corridor across the front of the site which could also act as a landscape buffer for the development from the road to the south.
- 4.6 Whilst it is acknowledged that the proposed redevelopment of the site would result in the loss of a light industrial unit, the unit is relatively small and not fit for purpose for some potential occupiers who require much larger units. The need for such units is accommodated approximately 1 km to the west of the site in the existing industrial estates on the edge of Andover.
- 4.7 The land at Motley Mill presents a rare opportunity for a partially brownfield site in a highly sustainable countryside location to be developed to deliver much needed high-quality homes for people within the Borough.
- 4.8 The site is a suitable location for development adjacent to both Weyhill and Andover to support growth and housing provision in the northern area of Test Valley. It would constitute a logical, sustainable and proportionate extension to Weyhill and is available for development now. The site is in single ownership and therefore there are no constraints regarding land ownership. The site provides a great opportunity for proportionate growth to support Weyhill, a Tier 3 settlement.
- 4.9 In accordance with the definition of 'deliverable' within the NPPF (2023), the site is available for development now, is in a suitable and sustainable location for future residential development and it

is achievable with a realistic prospect that housing will be delivered on site within five years following the sites allocation.

- 4.10 Further, the allocation of a sustainable site within close proximity to Andover will assist in supporting the services and facilities within the town together with providing an additional working population to the area. Andover, a Tier 1 settlement, where historically most of the growth for northern Test Valley has been directed, is located approximately only 1km to the east of the site. There are regular bus links from Weyhill. In addition there is a footpath/cycleway which runs from the site along Weyhill Road into Andover. The site is therefore considered to be a highly sustainable location which would encourage healthy, active lifestyles as encouraged by the NPPF.

5.0 Response to Housing Policies

- 5.1 The draft Local Plan sets out several specific housing policies. Policy HOU5 – Provision of housing to meet our needs is the most relevant to the land at Motley Mill. This policy allows for residential development which delivers a range of accommodation which reflects local needs, for both market and affordable housing. We support this policy and encourage the Local Plan to provide a range of house types and tenures to meet the requirements of the NPPF. Any new development at land at Motley Mill would ensure that the provision of the new homes meets the identified need of the Borough and the HMA. The site could provide a bespoke mix of homes to ensure there is a range of types and tenure which would be suitable to the surrounding area.
- 5.2 The importance of providing affordable housing in the Borough is both recognised and supported. Policy HOU1 sets out that on sites of 15 dwellings or more a target of 40% affordable housing will be the target. It is encouraged that in assessing the suitability of such sites for the provision of affordable housing the Council will take into account the size, suitability and viability. The land at Motley Mill would seek to provide affordable housing in accordance with this policy.

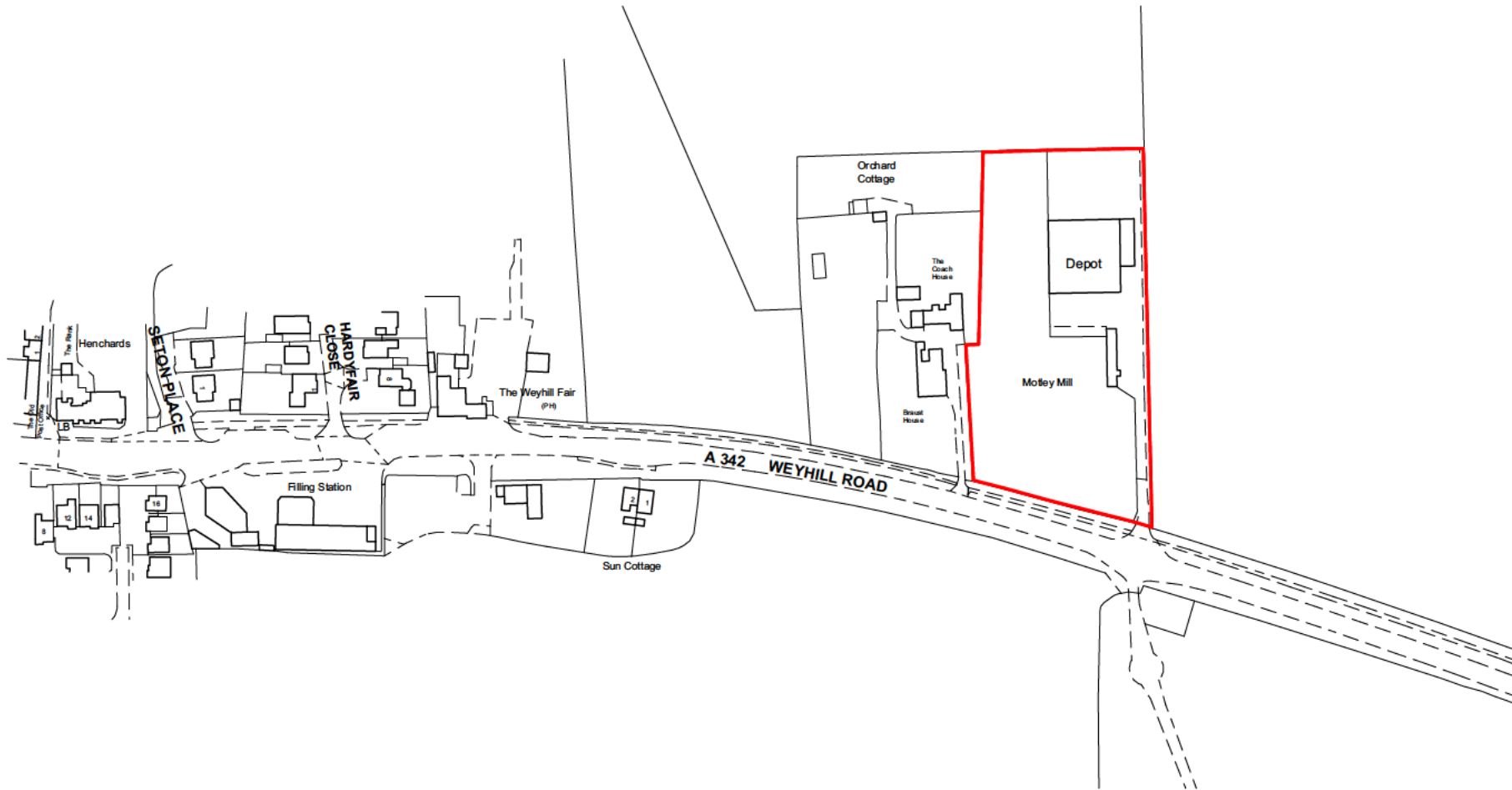
6.0 Conclusion

- 6.1 Paragraph 16 b) of the NPPF sets out that plans should be positively prepared in a way that is aspirational but deliverable.
- 6.2 It is considered that as currently drafted, the emerging Local Plan Review is not positively prepared in accordance with paragraph 35 a) of the NPPF and is therefore unlikely to assist the Government in its objective to significantly boost the supply of new homes. The draft Local Plan does not appear to have fully assessed the allocations which are carried forward from the current local plan which are yet to deliver when the need is now and the capacity of the proposed site allocations do not appear to have taken into account the mandatory requirement for BNG and this impact on housing numbers.
- 6.3 To assist in remedying this deficiency in the housing land supply, it is considered that the Council should allocate further sites of varying size to provide a flexible, responsive and deliverable housing land supply over the plan period. Both additional greenfield sites and previously developed land in sustainable areas including existing commercial buildings should be allocated to enable the Local Plan to meet its objectively assessed need and be found 'sound' by an Inspector. In this respect, we would like to highlight the suitability of the land at Motley Mill which is suitable to come forward in the plan period and would provide a key contribution to the small-medium sites which would be able to deliver in the early years of the plan period.
- 6.4 In accordance with the definition of 'deliverable' within the NPPF (2023), the land at Motley Mill is available for development now, it is a suitable and sustainable location for future residential development and it is achievable with a realistic prospect that housing will be delivered on site within five years following its allocation.
- 6.5 In summary, the land at Motley Mill would provide many benefits to Weyhill and the surrounding area, including:
- A highly accessible location, which will encourage healthy active lifestyles through walking and cycling and reduce the reliance on a private car;
 - Contribution of a mix of size, type and tenure of home, including much needed affordable housing, to Test Valley's housing land supply;

- Contribution of an additional working population to the area;
- Direct and indirect employment through the provision of new homes.

6.6 In light of the above and the details provided in these representations, it is requested that the Council review their allocated sites together with their housing requirement and look to allocate additional small and medium sites, such as land at Motley Mill, Weyhill to meet Test Valley's housing need over the plan period and beyond.

6.7 We trust the information contained within these representations is sufficient, however should you require any further information please do contact us.



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Site Location Plan

Scale 1:2500

REV: DATE: AMENDMENTS:

SCALE AT A4: 1:2500 DATE: Mar 2024



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CLIENT: Mr S. Brown

TITLE: Site Location Plan

PROJECT: Land at Motley Mill, Weyhill,
Andover, [REDACTED]

DWG NO.: TV-AD-845.01

REV: .

0 20 40 100
Scale in Metres. (1:2500 @ A4)



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