

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

RESPONSE TO CONSULTATION

Prepared on behalf of Test Development Company

March 2024

Table of Contents

1. Introduction
2. Land south of Forest Lane, Andover
3. Spatial Strategy, Settlement Hierarchy and Site Selection
4. Conclusions

Appendix 1: Site Location Plan

1. Introduction

- 1.1 On behalf of the landowners for land known as Land at Picket Twenty, Andover (land south of Forest Lane, Andover) (See Appendix 1 for the site location plan), these representations are submitted in response to the Test Valley Local Plan 2040, Regulation 18 (Stage 2) consultation.
- 1.2 Land at Picket Twenty, Andover has been submitted to the Strategic Housing and Economic Land Availability Assessment (SHELAA) and is identified as site reference 338 under 'Land at Forest Lane, Andover, which confirms the site is available. For ease of reference the site is referred to as 'Land south of Forest Lane, Andover' throughout these representations.
- 1.3 Land south of Forest Lane is not identified as a proposed allocation in the current draft Local Plan. The site is available now, deliverable, and developable and forms a logical and sustainable location for future growth in the Teir 1 settlement of Andover and should be allocated for development.
- 1.4 These representations set out the areas of agreement with the draft Local Plan and the areas which are not considered sound and require further work and a strategy review.

2. Land south of Forest Lane, Andover

- 2.1 The land south of Forest Lane forms a logical and sustainable extension to the existing Picket Twenty development area. It could deliver a significant number of new homes and associated infrastructure and support the role of Picket Twenty and Andover as a top tier settlement.
- 2.2 The site is well contained being located adjoining the existing Picket Twenty development, the A3093 to the west, the A303 to the south and woodland to the east. The SHLAA itself recognises the sustainability of the site confirming the site is adjacent to the Picket Twenty development southeast of Andover and Andover is identified as a Major Centre in the Local Plan settlement hierarchy. It goes on to confirm that Major Centres are settlements with the widest range of facilities and services in the Borough and are more accessible due to better public transport.
- 2.3 Development of the land south of Forest Lane would provide a sustainable and logical location for future growth being close to existing facilities and services accessible by foot, bicycle and public transport including Pilgrims Cross Primary School, the local centre, sports and recreation facilities, Walworth Industrial estate providing employment opportunities and transport links into Andover and beyond, with rail connections to London, and the A303 to the south providing access to range of employment, leisure and day to day needs.

3. Spatial Strategy, Settlement Hierarchy and Site Selection

- 3.1 The draft Local Plan sets out the spatial strategy for the Borough and confirms at paragraph 3.12 the market towns of Andover and Romsey, as the largest settlements in the Borough with the widest range and number of facilities, are at the core of the spatial strategy. As such these settlements continue to be a focus for development which is supported.
- 3.2 Paragraph 3.33 confirms Andover and Romsey (Tier 1 settlements) remain the most sustainable settlements and perform a key role in supporting the needs of the wider population in Test Valley. This is set out within Spatial Strategy Policy 1 (SS1) which supports strategic allocations as being appropriate scales of development at these settlements. This approach is supported.
- 3.3 However, we do not support the proposed approach to direct a large amount of housing growth to the east of Wiltshire at Ludgershall. It is considered this approach is inconsistent with the objectives of the spatial strategy and moreover, the site selection process does not support sites at Ludgershall in favour of development options at Andover including the allocation of land south of Forest Lane.
- 3.4 Policy SS3 sets out the housing requirement (Local Housing Need – LHN) for the Borough, this being a minimum of 11,000 homes over the plan period to 2040, which equates to 550 homes per annum. This is derived through the Standard Method approach and compares with the conclusions of the Strategic Housing Market Assessment (SHMA), which identifies a local housing need of 541 dwellings per annum.
- 3.5 The use of the Standard Method is supported and is consistent with the National Planning Policy Framework (NPPF). Given its alignment with the SHMA figure it is considered this is a suitable basis on which to plan for housing delivery over the Plan period.
- 3.6 Paragraph 63 of the NPPF requires that when establishing housing need, the needs of different groups in the community should be assessed and reflected in planning policies. This includes those who require affordable housing.
- 3.7 Currently the affordable housing target for the Borough is 200 affordable dwellings per year. Paragraph 5.354 of the Regulation 18 consultation explains the SHMA identifies an affordable housing need of 437 affordable homes for rent and 215 affordable home ownership homes per year. A figure which is significantly above current affordable housing delivery targets. The draft Local Plan (paragraph 5.356) accepts the affordable housing threshold does not provide for the affordable housing need in full and that the Council will seek to provide for the maximum affordable housing it can achieve.
- 3.8 The viability of the draft Plan is prepared on the basis of sites delivering up to 40% affordable housing which the Whole Plan Viability Assessment confirms should be

retained. As such in order to improve affordable delivery the Council needs to allocate further housing sites to ensure it meets as far as possible the identified affordable housing needs, whilst also ensuring that sites remain viable.

- 3.9 As noted within the latest Annual Monitoring Report (2022-23) a significant proportion of affordable provision has been provided as part of the Borough's New Neighbourhoods, including land at East Anton (Augusta Park), Picket Piece and Picket Twenty in Andover. It is therefore evident that large scale strategic sites are an important delivery mechanism for affordable housing across the borough and within the NTV HMA.
- 3.10 The broad distribution of the LHN between the two Housing Market Areas (HMAs) is as follows for 2020 – 2040:
- Northern Test Valley: 6,270 homes (313 homes per annum)
 - Southern Test Valley: 4,730 homes (237 homes per annum)
- 3.11 Table 6 of the Interim Sustainability Appraisal identifies a residual housing requirement for the NTV sub area of 3,752 dwellings (including a 10% supply buffer).
- 3.12 The draft Local Plan identifies site specific allocations at Policy SS6 to meet this requirement totalling 5 sites as follows (extract below from the draft Local Plan):

Northern Housing Market Area		Southern Housing Market Area	
Site	Number of Homes	Site	Number of Homes
Land South of London Road, East Andover	90	Land South of Ganger Farm, East Romsey	340
Land at Manor Farm, North of Saxon Way, North Andover	800	Land South of the Bypass, South Romsey	110
Land at Bere Hill, South East Andover	1400	Land at Velmore Farm, Valley Park	1070
Land East of Ludgershall	350	Land at King Edwards Park, Chandler's Ford	44 C2 units*
Land South East of Ludgershall	1150	Land at Upton Lane	Approximately 80

*C2 units extra care accommodation

- 3.13 Apart from the proposed allocations at Ludgershall, development is proposed at Andover which is supported being the main settlement in the NTV area.
- 3.14 The Spatial Strategy and distribution of growth within the NTV sub area is informed by an assessment, within the Interim Sustainability Appraisal, of reasonable alternative

growth scenarios. The land south of Forest Lane, Andover is identified in the 'preferred pool' of sites for NTV for assessment.

- 3.15 The Interim Sustainability Appraisal assesses each site and proposes 4 different 'reasonable growth scenarios' shown below (extract from the draft Local Plan). In 3 of the 4 scenarios land at Forest Lane, Andover is included as a proposed site to deliver housing.

Table 8 Northern Test Valley Reasonable Growth Scenarios²⁹

Housing Supply and Proposed Allocations		Reasonable Growth Scenarios			
		Andover and Ludgershall 1	Andover and Ludgershall 2	Andover Focus 1	Andover Focus 2
Supply Components	Commitments	1647	1647	1647	1647
	Urban SHELAA	480	480	480	480
	Town Centre Master Plans	522	522	522	522
	Windfall	493	493	493	493
	Neighbourhood Plan Supply	40	40	40	40
Constants	Land South of London Road	90	90	90	90
	Land at Bere Hill and Land At Bayliffs Bottom	800	800	800	800
Variables	Land at Manor Farm	800	900	800	900
	Land at Bere Hill Farm	600	300	600	600
	Land at Finkley Down Farm	0	0	900	900
	Penton Corner	0	0	0	210
	Land South of Forest Lane	0	150	150	150
	Land East of Ludgershall	350	350	350	0
	Land South of A342 / East Shoddesden Ln, Ludgershall	1150	1150	0	0
Total homes		6,972	6,922	6,872	6,832
% above/below LHN (6,304)		10%	9%	9%	8%
Potential capacity for unmet need		0	0	0	0

- 3.16 However, the Sustainability Appraisal goes on to rank the 'variable sites' in order of preference. It identifies land south of Forest Lane, Andover as ranking 6 out of 7 sites despite it being a suitable, sustainable, and logical location for growth and being considered in 3 of the 4 growth scenarios. It is not clear where this ranking has come from given that the site scored well in the sustainability appraisal and no significant negative impacts were identified. Specifically with regard to the site it states at paragraph 5.132 that the site is *"less well related to services and amenities in Andover in comparison other sites identified as 'constants' adjoining the settlement boundary. The site is also affected by constraints associated with site access, topography, landscape sensitivity and Ancient Woodland. These constraints also affect site capacity."*

- 3.17 These findings are not supported as the site adjoins the existing Picket Twenty development which was a previous Local Plan allocation and offers a wide range of facilities and services including a primary school, recreation, local centre and access by

foot, bicycle, and bus to employment at Walworth Industrial Estate and Andover town centre which also includes a mainline railway station to London Waterloo. The site proposed for development is not ancient woodland and an appropriate buffer can be provided to the existing woodland to the east. The site is not located in a sensitive landscape area and is contained to the north by existing development at Picket Twenty, the A303 to the south, the A3093 to the west and woodland to the east. Suitable access can be provided from the A3093, and surface water can be addressed as part of a development proposal.

- 3.18 The Sustainability Appraisal then goes on to conclude that the preferred growth scenario for the NTV area is Scenario 1 which does not include land south of Forest Lane, Andover. It instead includes significant development to be directed away from Andover to Ludgershall.
- 3.19 As a result, almost 40% of the total planned strategic development for the NTV sub area is being directed to the edge of Ludgershall and away from the Tier 1 settlement of Andover. This approach is not supported.
- 3.20 Ludgershall itself falls outside of the boundary of Test Valley, located within the Wiltshire administrative area, and therefore does not feature within the settlement hierarchy for Test Valley. Directing a significant amount of development to Ludgershall, represents a significant shift in the spatial strategy for the NTV sub area.
- 3.21 Table 10 of the Sustainability Appraisal assesses each of the growth scenarios which is set out below as an extract from the Sustainability Appraisal. Out of all the options Scenario 3 performs the best in terms of accessibility and communities and health. It is not clear why scenarios 1 and 2 perform better in terms of housing delivery than scenarios 3 and 4 as all scenarios are proposing to deliver the same amount of housing.
- 3.22 Specifically, para 6.149 of the Sustainability Appraisal states that *“In terms of housing delivery and timing, the phasing of strategic sites across the growth scenarios would provide for LHN within the plan period. Growth scenarios 2, 3 and 4 may perform marginally better as they include smaller sites with shorter lead in times for delivery.”* Therefore, it is clear that in fact scenarios 2, 3 and 4 perform better on housing.

Table 10: Appraisal of the Northern Plan Area Growth Scenarios

	Scenario 1	Scenario 2	Scenario 3	Scenario 4
SA Topic	Rank of preference and categorisation of effects			
Accessibility	2	2	1	1
Air Quality	=	=	=	=
Biodiversity	=	=	=	=
Climate Change Adaptation	1	2	2	3
Climate Change Mitigation	=	=	=	=
Economy and Employment	=	=	=	=
Communities and Health	2	2	1	1
Historic Environment	=	=	=	=
Housing	1	1	2	2
Landscape	1	2	2	3
Land, Soils and Resources	=	=	=	=
Transport	1	1	2	2
Water	=	=	=	=

- 3.23 In respect of accessibility the Sustainability Appraisal states at paragraph 7.2 that “...growth adjacent to the market town of Ludgershall has a good accessibility to a range of infrastructure and facilities and this location is also a focus for growth in the emerging Wiltshire Local Plan.” This is not supported as the delivery of over 1,500 dwellings at Ludgershall will require significant infrastructure including new education and healthcare facilities, shopping facilities and leisure and recreation as well as significantly improved public transport, walking, and cycling links. Compared to Andover, Ludgershall provides significantly less local facilities and services to meet day to day needs and as such the majority of development should be located at Andover being the principle settlement in the Borough.
- 3.24 In respect of landscaping, para 6.156 states “Land East of Ludgershall is located adjacent to the North Wessex Downs AONB where there is potential for significant adverse impacts on the setting of the AONB.” It is difficult to therefore understand how scenario 1 can be ranked 1 and there are questions over whether the impacts on the AONB have been fully assessed.
- 3.25 Both Land East of Ludgershall (NA7) and Land South of the A342 (NA8) are preferred options to land south of Forest Lane despite them having much lower potential to encourage the uptake of sustainable and active travel modes and their location in close

proximity to the AONB. This brings in to question the ranking of these sites within the Sustainability Appraisal.

3.26 Overall, it is considered that the Council has not robustly demonstrated why the proposed allocations are the most suitable and it is considered the Council has not properly assessed the relative performance of the alternative site options.

3.27 SA Appendix IV Housing Site Appraisals assesses the site options against the SA objectives. For land south of Forest Lane, the SA summary states:

“This site did not perform well for accessibility to many key services and facilities, by active or sustainable modes, due to the distances involved and limited public transport options available. Public footpaths in the area have limited connectivity. Walking and cycling connections may be able to be established between the site and neighbouring Picket Twenty which has a local centre, across Forest Lane. The vast majority of the site, other than the northernmost corner, is exposed to night time road traffic noise associated with the A303, exceeding noise limits. The site comprises grade 3a and 3b agricultural land and ancient woodland and SINC adjoining the land, to the east with the former requiring a buffer.”

3.28 We do not consider the summary properly assesses the site. The site adjoins the existing Picket Twenty development, which was a previous allocation. This has a primary school, local centre and recreation and leisure facilities all within walking and cycling distance of the site. Proximity to the A303 is raised however there are a significant number of existing housing developments located in close proximity to the A303 and the draft Local Plan also proposes to allocate land at Bere Hill, Andover which also adjoins the A303. Suitable acoustic mitigation measures can be delivered to mitigate against noise impacts, and it does not appear this has been taken into consideration. Appropriate buffers to the woodland to the east can be provided. As such it is considered that there are no overriding technical constraints to the delivery of the site.

3.29 The site selection process also raises concerns as to the appropriateness of the proposed allocations to the east of Ludgershall which do not benefit from the access to the significant level of services and facilities available at Andover. Yet these development locations are identified as sequentially preferable to land south of Forest Lane.

3.30 The approach to the assessment of land south of Forest Lane raises questions as to the soundness of the site selection process and in particular, the way in which this site is appraised relative to other potential development locations.

3.31 Within the recent Wiltshire Local Plan Regulation 19 consultation it describes Ludgershall centre as modest with a focus on day-to-day top up food shopping and

services.¹ Even Tidworth does not provide a significantly greater range of facilities and services, specifically shopping and leisure, particularly compared to Andover.

- 3.32 The level of services and facilities at Ludgershall is clearly limited, and the ‘modest’ nature of Ludgershall town centre is further referenced within the Wiltshire Local Plan Sustainability Appraisal where it states “Ludgershall is not considered to be self-sustainable and any additional housing, without the mitigation of additional employment and retail opportunities would be likely to result in significant car dominated mode share”.²
- 3.33 In addition, it is understood there are constraints regarding the existing railway line and requirement for public transport connections between the site and the town centre to providing a sustainable development. This would likely require the delivery of a bridge which could both be costly and take a long time to agree and deliver.
- 3.34 This all points towards the need to allocate significant levels of development at Andover rather than the nearly 40% of housing for the NTV area being proposed at Ludgershall.

¹ Wiltshire Local Plan: *Planning for Tidworth and Ludgershall* Paragraph 21 – September 2023.

² Wiltshire Regulation Local Plan: Sustainability Appraisal SA Annex 2.12 - Page 55

4. Conclusions

- 4.1 The overarching strategic approach, specifically in respect of the continued split of the Borough into the two Housing Market Areas (HMAs); the identified Local Housing Need (LHN); and the continued focus within the proposed Spatial Strategy to direct growth towards the Tier 1 settlements of Andover and Romsey, is supported.
- 4.2 Land south of Forest Lane is listed within the 'Preferred Pool' of site options within the NTV HMA but is not identified as a proposed site allocation, being rejected in favour of alternatives at Andover and at the edge of Ludgershall.
- 4.3 We do not support the spatial strategy in terms of directing significant scale of development to Ludgershall. This is not sound in terms allocating sites in sustainable locations which are well served by a range of services and facilities and genuinely reduce reliance on the car in favour of more sustainable travel patterns. It is also considered that more suitable and appropriate site options, in this case land south of Forest Lane, are available and would deliver a sustainable development that support the objectives of the Spatial Strategy.
- 4.4 Land at Forest Lane is located adjoining the existing development of Picket Twenty, in a sustainable and accessible location. There are no overriding technical constraints to the delivery of the site and the site should be allocated for a residential development.

