

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

COMMENTS FORM

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

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

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

Part A: Your Details

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

Further information can be found on our website at:

www.testvalley.gov.uk/localplan2040

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

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

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

Contacting us

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

Tel: 01264 368000

Website: www.testvalley.gov.uk/localplan2040

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

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

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:

Wates Developments Limited

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 attached letter</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
	Please see attached letter

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.



Thursday 28th March 2024
665/A3/JJA

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

By Email Only
planningpolicy@testvalley.gov.uk

Dear Sirs

**Re Test Valley Regulation 18 Stage 2 Local Plan 2040 - Feb 2024 Consultation
 Representations on behalf of Wates Developments Limited**

I write with reference to the above. As the council will be aware I act for Wates Developments Limited who have an interest in the land at Velmore Farm, Valley Park (SHELAA site ref 82 (2022)/ Policy SA6).

Having reviewed the Reg 18 Stage 2 Local Plan and its associated evidence base, Wates support the spatial strategy being promoted in the Reg 18 Stage 2 Plan and the proposed allocation of the land at Velmore Farm, Valley Park. That said, they would like to comment on certain aspects of the policy approach being proposed on this site, and on a number of the other development management policies contained within the Reg 18 Stage 2 Plan. Many of our comments on the strategic and development management policies are, we believe, capable of resolution by simple rewording/ a review of the evidence base so as to justify the position being advocated and ensure the plan is soundly based.

Before commenting upon these matters of detail we do however feel we need to address the issue of the Housing Requirement, Supply and Trajectory; and the associated issue of the Duty to Cooperate (DTC) and unmet housing needs; and how this has been addressed in the Reg 18 Stage 2 Plan and supporting evidence base. Wates are keen to ensure that the Local Plan which is taken forward is sound.

1 The Housing Requirement, Supply and Trajectory and Policy SS3

1.1 Local Housing Need and the Minimum Housing Requirement

1.1.1 As the Council has correctly identified in the Draft Plan the starting point for determining the Local Housing Need ("LHN") is the Government's Standard Method. The figure of 550 dpa¹ reflects the Standard Method figure applicable at this moment in time, and therefore accords with the advice set out in the PPG². We also note that given the distinct housing market areas within the borough this is split between the Northern Test Valley and Southern Test Valley HMA's at 57% and 43% respectively, generating a LHN for 313dpa in Northern Test Valley and 237dpa Southern Test Valley; and that as per policy SS3, each HMA will have its own housing land supply.

¹ See para 2.58, and 3.56, table 3.1 and policy SS3 (p25, p42 and p45 of the Reg 18 Stage 2 Plan)

² Housing and Economic Needs Assessment section of PPG - Paragraph: 008 Reference ID: 2a-008-20190220 Revision date: 20 02 2019

1.1.2 Before commenting on the housing land supply, it is important to note that the LHN figure is a minimum starting point, and it does not produce the Housing Requirement³.

1.1.3 The PPG⁴ goes on to consider the circumstances where it might be appropriate to plan for a higher housing need figure than the Standard Method indicates. Such circumstances can include:

- Instances where housing need is likely to exceed past trends; and
- Where the authority agrees to address unmet need arising from neighbouring authorities.

1.1.4 The PPG is not exhaustive in its examples as to what may be a sound reason for considering an uplift. Matters such as a high affordability ratio that is following a rising trend, along with significant affordable housing need, and of course the importance of ensuring an adequate buffer to cater for under supply, or instances where the Plan strategy fails to deliver as expected, are all sound reasons for considering an uplift.

1.1.5 In the context of the above we note that the council have sought to plan for a supply that is 10% above the requirement and that this is said to be to address any issues associated with deliverability. Whilst we fully support the principle of a 10% buffer, this does not address the issues identified in the PPG as to why an uplift in the LHN figure may be appropriate. Having reviewed the rationale for not setting the housing requirement above the LHN, we do believe the question of affordability requires further consideration.

1.1.6 To this end, we note, when looking at the ONS 'House Price to Workplace-Based Earnings Ratio - March 2023' that the ratio of median house price to median gross annual workplace-based earnings by local authority district, England and Wales, 2002 to 2022 indicates that the ratio of median house price to median gross annual workplace-based earnings in Test Valley has increased over the past 10 years from 8.41 to 9.75⁵, the average for Hampshire being 9.87, and the average for England being 8.28. Whilst, as the standard methodology takes into account the issue of affordability in its calculations, the above alone may not suggest a need for an increase in the LHN figure, the affordable housing need as evidenced by the SHMA, and summarised in the SA is telling in its identification of an annual affordable need of 652dpa⁶. This figure is, as the SA acknowledges at para 5.23, 120% of the total LHN⁷. Whilst we understand the Council are proposing an affordable housing policy requiring 40% onsite provision, this will only be triggered for those sites that meet the qualifying criteria. It is therefore clear that the affordable housing need will not be met. Given the decreasing trend in terms of affordability set out above, the gross affordable housing need of 652dpa is highly likely to increase over the plan period, leading to an increase in the net shortfall and in turn a higher number of people in need and on the Council's housing waiting list.

1.1.7 In the context of the above we note that according to para 10.16 of the Authority Monitoring Report 2022-23 (AMR) (Dec 23)⁸: *"For the period 2022/23, a total of 140 affordable homes were delivered in the Borough as recorded by the Council's Housing and Environmental Health Service.*

³ Housing and Economic Needs Assessment chapter of the PPG – Paragraph: 002 Reference ID: 2a-002-20190220
Revision date: 20 02 2019

⁴ Housing and Economic Needs Assessment chapter of the PPG – Paragraph 010 Reference ID: 2a-010-20201216
Revision date: 16 12 2020

⁵ ONS House price to workplace-based earnings ratio – March 2023 – tables 5c & 6c
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

⁶ See figure 4 of the SHMA.

⁷ 652/550 x 100 = 118.54

⁸ See web link: <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/amr>

*This is a decrease from the 408 that were delivered in the last reporting year, and is lower than the annual target of 200 affordable homes*⁹

1.1.8 This is clearly well below the annual requirement set out in the SHMA and whilst we are not advocating the plan looks to deliver circa 1,630dpa¹⁰ in an attempt to meet the affordable need in full, the above does in our opinion demonstrate the need for an uplift to the LHN figure to boost the supply of open market and affordable homes and thus help address the affordable housing needs of the borough. To this end we note the SHMA at para 37 makes it clear that *'the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the Borough.'* Reviewing the LHN in light of the above would also reflect strategic objective 13 of the Plan - to *'Provide a range of homes that are fit for purpose and designed to meet the needs and aspirations of different groups within the community, including a range of affordable housing and homes that meet the needs of an ageing population'*.

1.1.9 The reasons for uplifting the LHN should, as the council will be aware, be set into two categories, firstly those that indicate an uplift is required for the borough itself and secondly any uplift that might arise from meeting unmet need from neighbouring authorities.

1.2 Duty to Cooperate and Unmet Housing Needs

1.2.1 Section 2 of the Regulation 18 Stage 2 Local Plan in commenting upon the Duty to Co-Operate, indicates that the Council is working collectively with authorities across South Hampshire, through the Partnership for South Hampshire (PfSH) on a range of strategic planning matters, including the housing needs of South Hampshire. It goes on to explain that a Spatial Position Statement (SPS) for the subregion, for the period to 2036 was published in December 2023, and that this sets out the current level of housing need and supply in South Hampshire. Para 2.19 goes on to suggest that whilst the SPS *'identifies a supply shortfall in meeting housing needs across South Hampshire, this reflects the fact that a number of Local Plans are at the early stages of plan preparation'*; and that *'As individual Local Plans progress, each Local Planning Authority will consider whether they can meet their need.'*

1.2.2 Whilst we note para 2.20 of the Regulation 18 Stage 2 Local Plan indicates that the SPS, looks to identify broad areas of search which could be considered in the future to help address any remaining shortfall in supply, it goes on to advise that *'Whether these sites are progressed, is to be considered and decided by each of the individual Local Planning Authorities through the preparation of the respective Local Plan'*.

1.2.3 Having regard to the above and having reviewed the DtC Topic Paper, the SPS and the PfSH SoCG of September 23, as well as the relevant sections of the SA, it would appear from table 1 of the SPS that whilst there is a shortfall in supply across the sub region for the period 2023-2036 of 11,771 dwellings¹¹ it is not currently accepted that this represents a 'definitive' unmet need, rather a *'need that is not yet planned for'*¹²; and that the position on unmet need continues to evolve and is subject to updated evidence that will emanate from the progress of the local plan reviews across the sub region¹³. That said the PfSH SoCG makes it clear at para 3.26 that PfSH authorities are taking

⁹ Footnote 17 indicates that *'All of the major developments in the current LP have come to an end, so until the revised LP identifies new major sites, the Council is mainly relying on smaller infill sites'*.

¹⁰ 100/40 x 652 = 1,630

¹¹ We note this figure differs from that given at table 1 of the PfSH SoCG which is 14,531 but reflects the position for 2022 – 2036.

¹² See para 3.22 of the PfSH SoCG

¹³ See table 1 of the DTC Topic paper, and para 5.25 – 5.33 of the SA.

a two-stage approach to addressing the needs of those authorities that may demonstrate that they are unable to meet their housing needs in full; with para 3.27 advising that stage 2 includes the identification of Broad Areas of Search for Growth which will be identified in the SPS. The SPS at para 6.40 identifies the Broad Areas of Search for Growth as *'potential areas for strategic development in accordance with the approach to:*

- *Focus development on locations with a relative lack of significant constraints, both national constraints listed in the NPPF and additional constraints of subregional importance; and*
- *Focus development at locations which are most accessible by public transport, walking and cycling, or have the potential to be made accessible.'*

1.2.4 The SPS goes on to advise that: *'work undertaken to map significant constraints on development and accessibility by sustainable transport, has resulted in seven areas of search being identified. Subject to further detailed assessment, these areas are considered potentially the most sustainable options for new strategic development with a relative lack of constraints and good sustainable transport provision or potential. In total, they are estimated to have sufficient capacity to provide approximately 9,700 dwellings, again subject to further testing of development capacity, the infrastructure and mitigation needed and deliverability. These new homes will be delivered alongside new employment, community and other uses as part of a mixed-use development'*.

1.2.5 One such area of search as identified in policy SPA8 of the SPS is the land south west of Chandlers Ford in Test Valley which is commensurate with the land at Velmore Farm.

1.2.6 Given the above, and notwithstanding whether the LHN should be increased to help address the unmet needs of the sub region, the question has to be raised as to whether the proposed allocation of the land at Velmore Farm for 1,070 dwellings under policy SA6 is to assist with the overall buffer and provide some resilience, or whether it is to help address unmet needs in accordance with the SPS and PfSH SoCG. By definition it cannot be both – either it is for resilience or unmet need. As drafted the plan and the associated SA suggest it is for resilience, which begs the question what happens if the council are asked to assist in meeting the unmet needs of adjacent authorities?

1.2.7 Having regard to the above, we note the SA makes it clear at para 5.30 that the SPS does not provide any clear evidence to justify exploring setting the housing requirement in Test Valley above LHN; and that the identification of two areas of search in Test Valley, *'in and of itself does not serve as a reason to consider setting the housing requirement above LHN'*. Rather the SPS *'places emphasis on local plans to determine the appropriate housing strategy for their area and the 'broad areas of search for growth' in terms of quantum and distribution'*. Para 5.30 goes on to say that: *'Should any definitive unmet housing need be identified through local plan preparation in South Hampshire agreement on quantum and distribution will be established through bilateral statements of common ground and reflected in the PfSH Statement of Common Ground.'*

1.2.8 The above is however complicated by para 5.41 of the SA which suggests that: *"Although there is currently no compelling reason to set the housing requirement above LHN there is merit in appraising growth scenarios above LHN in Southern Test Valley. This is in relation to the potential scenario of unmet housing need being identified from neighbouring authorities in south Hampshire during preparation of this plan"*. Furthermore, para 5.52 of the SA advises: *"The Council has continued to work closely with the PfSH authorities in the preparation of the Spatial Position Statement and Statement of Common Ground. Should any definitive unmet housing need be identified a strategic approach would need to be agreed with the PfSH authorities regarding how this should be distributed across the PfSH area."* Whilst para 5.79 states: *'As concluded in the previous*

section, there is currently no definitive unmet housing need from neighbouring authorities to accommodate in Test Valley. However, there is potential for unmet housing need from south Hampshire authorities to be identified during preparation of this plan. Therefore, it is appropriate to identify and appraise reasonable alternative growth scenarios in the south of the plan area only. However, these growth scenarios would need to be reassessed if definitive unmet need is identified during the preparation of the Test Valley Local Plan 2040.'

1.2.9 The SA goes on, in reviewing the broad housing distribution, to conclude in para 5.57 that the broad aim is, in accordance with the settlement hierarchy, to direct growth to the main settlements, including Andover and Romsey as these are accessible and well connected to community facilities, infrastructure, employment and public transport, and that there is no compelling reason to direct larger scale strategic housing growth to the rural area, rather smaller scale growth will be appropriate to support sustaining local facilities in these settlement.

1.2.10 In the context of the above we note that Romsey is the only Tier 1 settlement in southern Test Valley, and that Valley Park, is defined as a Tier 2 settlement in Southern Test Valley, which Policy SS1 identifies as capable of accommodating strategic scale growth, and para 5.82 of the SA suggests encompasses access to a range of services, facilities and employment centres which can be considered for a proportion of new housing supply commensurate with its status. We also note that the Housing Site Selection Topic Paper in commenting upon the land at Velmore Farm in figure 6 states: *'The site is sustainably located adjacent to Valley Park which is well connected to services, facilities and public transport with Eastleigh Town Centre and railway station within cycling distance. There are existing employment areas near to the site. Development can be located within areas of lower landscape sensitivity and to maintain the integrity of the local gap. Development will also be located to avoid adverse impacts on heritage assets including the Roman Road, the site is larger enough to mitigate this. Development of the site offers the opportunity to deliver potentially a local centre, employment development and a new school. There is a small area at risk of potential surface water flooding on the site.'*

1.2.11 Furthermore we note that of the reasonable growth options for southern Test Valley explored in the SA, two of the four options encompassed variables that included the land at Velmore Park, and that sequentially Velmore Park was the preferred variable¹⁴, para 5.102 advising: *'Velmore Farm performs relatively well through SA and is located close to a range of key facilities and infrastructure in the adjoining urban areas of Chandlers Ford, Eastleigh and Southampton. The site is located within a local gap but development of the site would still maintain a gap. The site is located to a congested transport network but transport modelling concludes the impact of the site compared to the baseline position would not be significant.'*

1.2.11 Whilst we will comment upon the relative merits of the land at Velmore farm, and its critique within the SA below, we are slightly surprised, given the issues of unmet need that exists in the area, and the uncertainties as identified in the PfSH SoCG and SPS, that the SA did not, as a reasonable alternative, explore the merits of Velmore Farm and Halterworth, the second of the preferred variable sites tested, just to establish if the scale of development generated was acceptable if a 'defined' unmet need is identified by neighbouring authorities through the PfSH during the plans preparation.

¹⁴ See para 5.101 of the SA.

1.3 Conclusions on the Housing Requirement

1.3.1 Whilst recognising that the Council has worked from the correct starting point, which is the minimum annual LHN calculated by reference to the Standard Method i.e. 550 dpa, the PPG is clear in that the LHN is only the starting point.

1.3.2 There are a range of factors relevant to the calculation of the housing requirement for the Draft Plan that the Council needs to consider when arriving at its overall housing requirement. These include:

- The inherent lack of affordability and the increasing affordability ratios; and
- The low levels of affordable housing delivery, and attendant increasing need for affordable homes.

1.3.3 When these factors are properly scrutinised, they demonstrate clear and rational reasons as to why there should be an uplift to the LHN. This is compounded by the issue of unmet housing needs within the wider PfSH area,

1.3.4 Having regard to the above Wates believe that, in order to ensure the Local Plan is soundly based, at the very least the plan should provide for the LHN + **a 10% buffer** to ensure the Plan proceeds on a robust footing. This would lead to an annual housing requirement of **605dpa**. Setting the housing requirement at this level would significantly improve the affordability situation within the Borough as it would help deliver more affordable homes for those members of the community in the most need. It would also help address the unmet housing needs of the PfSH area. Whilst as indicated above we appreciate the fact the plan has sought to deliver 10% more than the LHN, this is a different matter.

1.3.5 In the context of the above we note that the SA suggest at paras 5.23 and 5.24 that the '*limitations in demand for market housing*' would likely result in the both the housing requirement and absolute affordable housing need not being provided for if a higher LHN figure was adopted which would place TVBC under the punitive measures set out in para 11 of the NPPF. We would refute this assertion. The demand is there to deliver a higher LHN if the sites are allocated to do so. Indeed, the Housing Implementation Strategy, in setting out the housing completions in the borough from 2011/12 to 2022/23 in table 2 clearly demonstrates that the borough has delivered significantly more than 550dpa in 9 out of the 12 past years, the average completion rate being 765 dpa¹⁵. Furthermore para 3.51 of the Reg 18 Stage 2 plan indicates that over the last five years (2017/18-2021/22) the Council has delivered just over 4,280 homes i.e. an average of 856dpa, whilst the last HDT test results (Dec 2023) were 189%. The 620dpa currently proposed is just 72.5% of that delivered over the five year period (2017/18- 2021/22), such that there can in our opinion be no question of market saturation at the level proposed.

2 The Sustainability Appraisal (SA)

2.1 Given the issues of unmet need that exists in the area, and the uncertainties as identified in the PfSH SoCG and SPS as to how this is to be addressed, it is our view a robust approach to take, when assessing the overall housing growth options, would be to assess as a reasonable alternative, the merits of taking forward the land at Velmore Farm and Halterworth given their standing in the order of preference, just to establish if the scale of development generated was acceptable if a

¹⁵ The total delivery for Test Valley over the period 2011/12 to 2022/23 according to table 2 of the Housing Implementation Strategy was 9,188 dwellings, which over a 12 year period is 765dpa.

'defined' unmet need is identified by neighbouring authorities through the PfSH during the plans preparation.

2.2 This matter aside we note that in reviewing SA and its appraisal of the reasonable alternative growth scenarios in Southern Test Valley in section 6, that the only times scenario 1 (Velmore Farm) scores less than scenario 3 (Halterworth) is against SA Topics on Climate Change Adaptation and Historic Environment. In reviewing the section on Climate Change Adaptation, and in particular paras 6.38 – 6.42 of the SA it's clear that all of the variable sites were located within flood zone 1 and whilst some of the sites are affected by surface water flooding, this has been taken into account in the assessment of housing capacity. Nowhere in this section does it explain that Velmore Farm scored any less favourable than the other sites. All para 6.41 says is that "*Velmore Farm has corridors of surface water flooding on the site, but this does not have a significant effect on development potential*". This does not to our mind suggest a less score than the other sites, especially as the council know that the masterplan for the site has been designed to keep development away from these areas of flood risk and to introduce mitigation that would help improve the current situation. To this end we note that para 6.42 suggests that '*Overall neutral effects are predicted across the growth scenarios.*' Which raises the question why seek to rank them.

2.3 Turning to the issue of heritage impacts, para 6.61 of the SA indicates that "*There is a Roman road which runs through the Velmore Farm site. Subject to the outputs of survey work it is likely that the remains of the Roman road may need to be retained. Retention of the Roman road is a relatively small part of the site and is not anticipated to significantly affect development potential.*" Para 6.65 goes on to say that "*Across all scenarios there is potential for negative effects subject to implementation of appropriate site layout, design and landscaping schemes*". Again, the council know that the masterplan for the site has been designed to maintain and make a feature of the Roman road. Indeed, the Housing Site Selection Topic Paper in commenting upon the land at Velmore Farm acknowledged that the site is larger enough to mitigate / avoid any adverse impacts on heritage assets including the Roman road, such that the sites ranking in the SA seems somewhat odd.

2.4 We also note that despite its scoring, the site at Velmore Farm is referenced as having high landscape sensitivity in a number of locations – see for example paras 6.73 and 7.4. Having reviewed the SA and associated appendices, especially appendix 4, the SHELAA and the Landscape Sensitivity Study, Wates Landscape consultant (SLR) have questioned this given its landscape value has been judged as being "local level" (see para 1.1.507 of the Landscape Sensitivity Assessment), which is the second lowest of five levels of value (see p17 of the Landscape Sensitivity Assessment, Part One). As set out below, we believe that there should, based upon the application of the NE guidance, be a very clear relationship between landscape value and landscape susceptibility such that they should each be 50% of the equation, meaning that low value and high susceptibility should equate to a moderate sensitivity overall. As a result, we consider the SA and Landscape Sensitivity Study need to be revisited in this regard.

2.5 Turning to appendix 4 of the SA and the detailed assessment of the land at Velmore Farm, we note that:

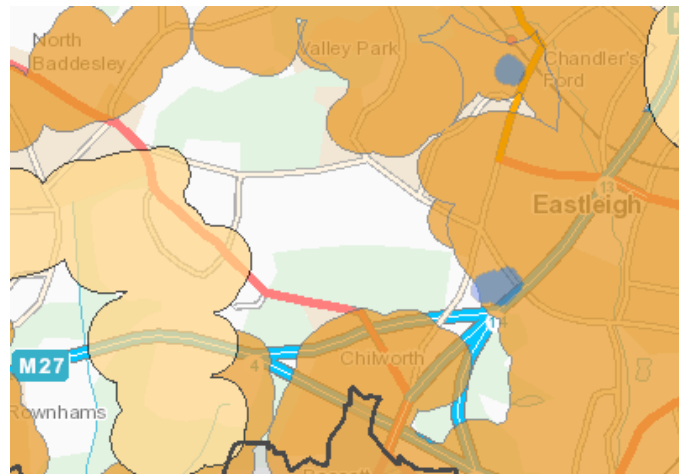
2.6 SA objective 1a (p 616) refers to the provision of accommodation for gypsies, travellers and travelling showpeople on the site, in line with the relevant Local Plan policies. Policy HOU8 of the Regulation 18 Stage 2 Plan however indicates that the needs of gypsies, travellers and travelling showpeople will be met by a combination of sources, as follows:

- Intensification of existing permanent sites
- Expansion of existing permanent sites

- Regularisation of unauthorised sites
- Site allocation at Land at Bunny Lane, Timsbury for 4 gypsy and traveller pitches

2.7 Given the above we assume there is no need to provide for the needs of gypsies, travellers and travelling showpeople on this site.

2.8 SA objective 4c (p 619) refers to part of the site falling within a consultation area for minerals resource. Having reviewed the Hampshire Minerals Plan (please see below), it would appear that there is a small incursion in the north eastern corner of the site, which is so small we cannot see it being of the scale to warrant any further minerals specific assessment.



2.9 SA objective 6a (p 620) indicates that part of the site is within Flood Zones 2 and / or 3, and / or at moderate / high risk of surface water flooding, and / or is likely to be susceptible to groundwater flooding at the surface. We can confirm that as set out above the site would be brought forward in a way that is capable of avoiding the areas identified as being at risk of flooding; and that as per the draft masterplan the intention is to ensure development is not located in flood zones 2 & 3 or in any areas at risk of surface water or ground water flooding. Surface water run off rates will be restricted to greenfield rates and attenuation of surface water flows in the forms of SuDS features provided accordingly. Said surface water attenuation will be designed to take into account the predicted effects of climate change, the most recent EA climate change guidance issued in May 2022 advising that when designing new drainage systems for residential development an allowance will need to be made for increases in rainfall intensity of up to 45%.

2.10 In addition to providing surface water attenuation, the SuDS features will be designed to provide water quality and biodiversity benefits in line with CIRIA guidance. Examples of SuDS features that may be appropriate include pond storage, whether to detain flows or allow infiltration to ground, swales to transport flows across the site in line with natural flow paths, and permeable paving across areas of hard standing (similarly either sealed to store flows or allow infiltration to ground). Additionally, open SuDS features such as shallow attenuation ponds that hold a base level of water all year round can aid in the 10% Biodiversity Net Gain assessment/requirement.

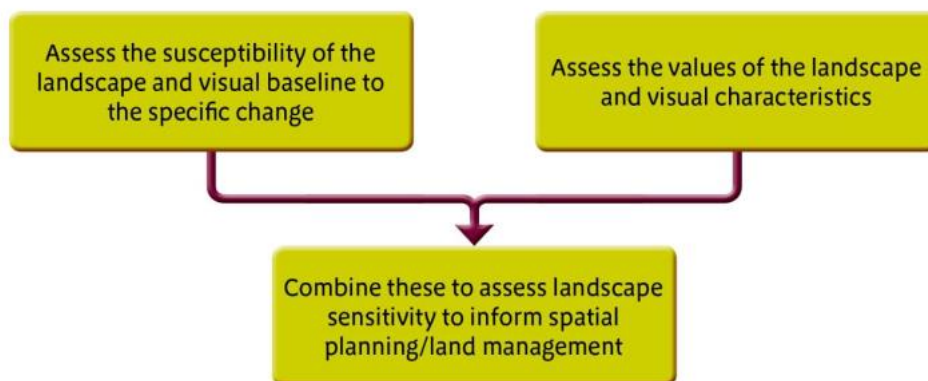
2.11 Having regard to the above and based on the topographical survey data available, indicative locations across the site where SuDS features are likely to be necessary have already been allowed for within the masterplan, including the area close to the proposed access, where water would be stored and release at a controlled rate so as to prevent any surface water flooding.

2.12 Given the above we would suggest the sites scoring in this regard is amended to '0' - No effect.

2.13 SA objective 8a (p 621) refers to the western, north-western, southern-western, and central parts of the site, as falling within a landscape of high overall sensitivity, whilst the northern, northern-eastern, eastern, and south-eastern edges of the site, are defined as having a lower, Moderate-High sensitivity.

2.14 The above reiterates the findings of the Landscape Sensitivity Assessment. As the council will be aware, sensitivity is a combination of landscape susceptibility and landscape value, as set out in the "An Approach to Landscape Sensitivity", Natural England 2019, and reproduced in the Stephenson-Halliday Assessment, and below.

Figure 1 Assessing Landscape Sensitivity



2.15 The Susceptibility of Velmore Farm is assessed as being between high and moderate to high, but value is assessed as being "local level" (see para 1.1.507 of the Landscape Sensitivity Assessment), which is the second lowest of five levels of value (see p17 of the Landscape Sensitivity Assessment, Part One).

2.16 Given the above we are perplexed as to how Velmore Farm has ended up with the highest level of sensitivity being recorded across much of the site when it has the second lowest level of value? There should, based upon the application of the NE guidance, be a very clear relationship between landscape value and landscape susceptibility. In effect they should each be 50% of the equation, meaning that low value and high susceptibility should equate to a moderate sensitivity overall. As a result, the sites scoring in the SA matrix needs to be re-evaluated, albeit we have left it as is at present as this requires more detailed discussions with the council and their landscape consultant.

2.17 Similarly we note that SA objective 8c (p 622), in commenting upon the potential effects of the proposals upon the "risk of physical or visual coalescence", in the performance column states that the site "would result in a reduction in the distinction/separation of settlements through a degree of visual and/or physical coalescence", although it is noted in the commentary that "the presence of Hut Wood reduces the impact on distinction between settlements in a visual sense".

2.18 Wates landscape consultant having assessed the site has highlighted the fact that the risk of physical and visual coalescence is not only reduced by the presence of Hut Wood, which is a mature, largely coniferous and therefore evergreen visual barrier, but also by the intervening topography between the settlements, which comprises a convex slope which rises between Templars Way (at

between 30-40m AOD and Hut Wood (which rises above 75m AOD at its southern edge). This topography not only provides a visual barrier in and of its own, but also increases the visual screening effect of Hut Wood.

2.19 Furthermore, as Policy SA6 specifies at section C that “a significant area of high quality and accessible Green Space” should be provided “in the south and west of the site”, the policy itself would provide even further insulation against any potential for physical or visual coalescence between Chandler’s Ford and Chilworth.

2.20 Given the above we believe the overall risk of coalescence is at worst “mixed performance” rather than negative.

2.21 SA objective 9b (p 622) refers to the potential impact on archaeological assets that could affect the development of this site. We would question the sites scoring on this regard. As set out above the intention is to design the scheme to maintain and make a feature of the Roman road that runs through it such that the sites negative score seems overly harsh and should in our opinion be amended to ‘0’ - No effect.

2.22 SA objective 10a (p 622) refers to the potential for the sites development to result in or contribute to indirect and or cumulative adverse effects on protected sites. Again, we would question the conclusions reached, especially when para 6.35 of the main SA states: “There is SINC and Priority Habitat within Velmore Farm (‘variable’ site) on the western site boundary and the proposed location of development takes this into consideration. There is also SINC habitat adjacent to the southern site boundary at Hut Wood and appropriate buffer areas will need to be applied”; and para 6.37 continues “All the of the growth scenarios perform similarly in relation to effects on designated habitats and overall there are limited concerns regarding significant effects. All growth scenarios and sites would have a policy requirement to achieve biodiversity net gain in line with national policy requirements. Overall, all the reasonable alternative growth scenarios are predicted to have a neutral impact [on Biodiversity]”

2.23 Given the above, and as Policy SA6 provides for the provision of onsite SANG in relation to the New Forest SPA, SAC and Ramsar Site, appropriate mitigation in relation to the Solent SPA, and appropriate mitigation in relation to the River Itchen SAC, the sites scoring should in our opinion be amended to ‘0’ - No effect.

2.24 Having regard to the above we believe the SA for the land at Velmore Farm, Valley Park should be amended thus:

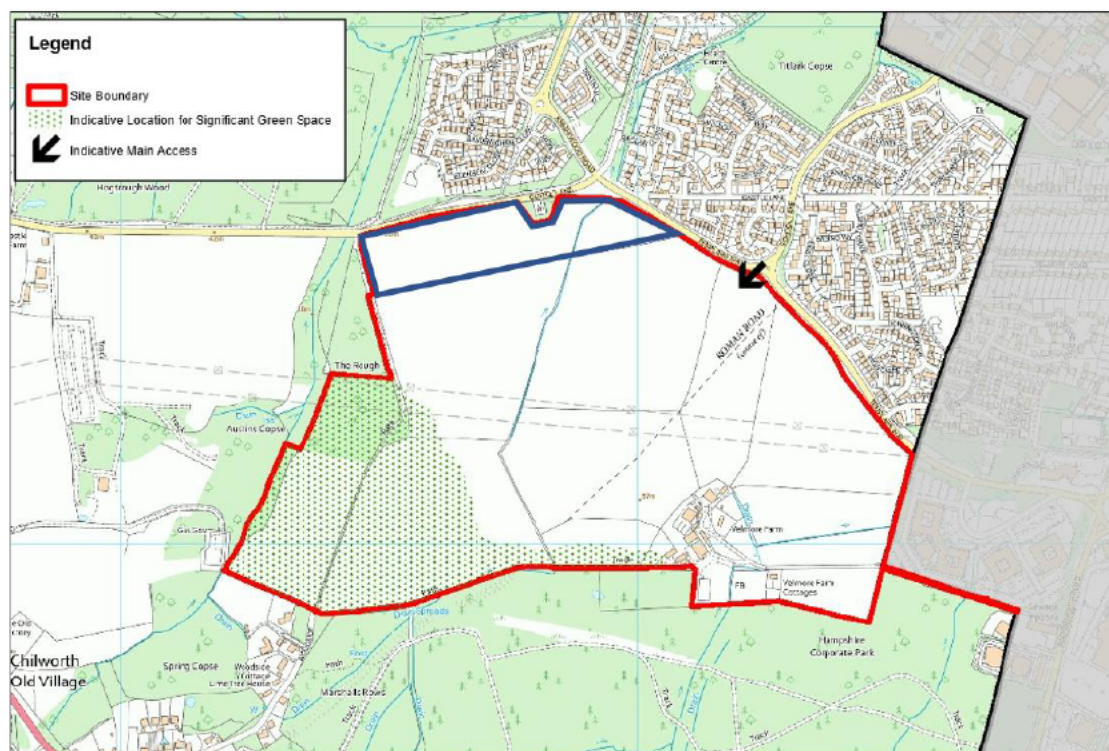
	1	2	3	4	5	6	7	8	9	10	11	12
	Housing	Economic prosperity	Access to services & facilities	Efficient use of land & conserve soil	Water environment	Flood Risk	Air quality	Landscape & townscape & settlement character	Historic environment & heritage assets	Biodiversity	Climate Change	Health and wellbeing
SA appendix 4	+	+	+	+	+	+	?	+	+	+	+	+
Wates scoring	+	+	+	+	+	0	?	+	+	+	+	+

	3 Access to services & facilities							
	A	B	C	D	E	F	G	H
SA appendix 4	++	++	+/-	++	++	++	++	++
Wates scoring	++	++	+/-	++	++	++	++	++

2.25 This matter aside we would like to advise that where the SA refers to the provision of a 1.5FE primary at Velmore Farm, we are in fact looking to potentially deliver land for a 2FE primary, subject to the adjacent landowners making the appropriate contribution, so as to future proof the primary provision being offered on the site, and would ask that the next iteration of the SA takes this and our comments above into consideration.

3 Velmore Farm, Valley Park - Policy SA6

3.1 As the council will be aware Wates control the majority of the land at Velmore Farm, with Barratt Homes controlling the remainder. This is annotated on the draft site allocation plan below, the area controlled by Barratts being outlined in blue. The council will also be aware that Wates believe the land within their control could accommodate circa 850 dwellings and associated uses, including 1.5ha of employment land, potentially up to 2.2ha for a 2FE primary, a community hub, SANG and public open space, as assessed within the SHELAA (site ref 82), the Barratts site being assessed as suitable for 220 dwellings in the SHELAA (ref 285).



3.2 Having regard to the above, Wates support policy SA6 and concur with the Council about the sites development capacity in overall terms i.e. 1,070 dwellings; 1.5ha of employment land¹⁶, and

¹⁶ Given the multifunctional nature of the new use class e, and in an attempt to clarify what is required, whilst also providing some flexibility to reflect the length of the build program, and ensuring a sustainable development, we would suggest that

land for a 1.5 form entry (FE) primary school¹⁷. Likewise, they are supportive of the concept of the delivery of a significant area of high quality and accessible Green Space in the south and west of the site, albeit they would question what 'significant' and 'high quality' mean in practice; as well as the Provision of onsite Suitable Alternative Natural Greenspace (SANG) in relation to the New Forest Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar Site. Likewise, we concur about the need for the site to contribute towards appropriate mitigation in relation to the Solent Special Protection Area (SPA), and the River Itchen Special Area of Conservation (SAC); and agree on the proposed point of access (off Templars Way)¹⁸, the need to enhance existing public rights of way to Valley Park, Romsey and Eastleigh, and the need to undertake an archaeological assessment of the site, albeit we would question whether the policy wording can insist on the 'conservation' of the heritage asset as that would prejudice the outcome of the archaeological assessment. Wates also support the need to adopt a sequential approach to the development of the site itself, taking into account flood risk from all sources including surface water flooding. To this end we have no objection to their being a comprehensive approach to the masterplanning of the site with built development being predominately focused on the middle, north and northeastern parts of the site, with the south western part of the site retained as a significant area of publicly accessible Green Space. We also believe, having regard to the comments in Reg 18 Stage 2 Plan that the site could, subject to further liaison with the local community and viability testing, make provision for a community hub/ local centre to enhance its sustainability¹⁹. This area could also encompass a transport mobility hub with public transport connections with co-location of delivery lockers and shared transport facilities – cycle/E-bike, Car Club, Electric Vehicle charging points, taxi pick-up/drop-off point. Furthermore, Wates would support the premise of part of the housing offer including accommodation for the elderly.

3.3 In the context of the above we have enclosed an updated masterplan that looks to demonstrate how the above could be delivered. Having regard to para 74 of the NPPF (December 23) we can also confirm that:

- Velmore Farm provides an ideal opportunity to deliver a well located and well-designed expansion to Valley Park supported by all the necessary infrastructure and facilities to make it a truly sustainable and beautiful place in which to live.
- Velmore Farm is situated in a highly sustainable location with access to a genuine choice of transport modes that could help meet the housing needs of Test Valley / the unmet needs of unmet housing need in the PfSH area in a sustainable way.
- Velmore Farm is situated within the heart of the Enterprise M3 and on the edge of the Solant LEP, and thus able to draw upon and support the area's economic potential and associated planned investment in infrastructure.
- The masterplan for Velmore Farm has been designed to be landscape led and to provide opportunities for real and tangible net environmental gains.
- The size of the site and its location relative to Valley Park is such that it will be capable of supporting a sustainable community, with suitable access to services and employment opportunities within the site itself as well as the associated facilities within Valley Park.

the 1.5ha of employment land referenced in policy SA6 is cross referenced to a range of employment uses falling within use class e (c) and (g). See <https://www.planningportal.co.uk/permission/common-projects/change-of-use/use-classes>

¹⁷ Notwithstanding the policy position, we are in fact looking to deliver land for a 2 FE primary so as to future proof the primary provision being offered on the site.,

¹⁸ Albeit we would suggest a second and possible even third point of access is required, one to serve the Barratts site to the north, off Castle Lane, and a second within the Wates land (to the south of the main access – north of Montgomery Way).

¹⁹ Policy SA6 could thus refer to: A Neighbourhood centre with a range of community facilities falling within use class e including, but not limited to library, retail, employment, and potential healthcare.

- The comprehensive masterplan for the site will, together with requirements of policy SA6 of the Local Plan set clear expectations for the quality of the places to be created and how this can be maintained. These together with the adoption of design guides/ codes will secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community.

3.4 As a result, we believe the site to be eminently suitable, available, and deliverable, and remain committed to working with the Council to facilitate the delivery of this site in accordance with councils predicted housing trajectory i.e. with delivery starting in 2028/29, and with 2/3 outlets delivering 150 dpa from 2031/32, and all 1070 dwellings being delivered within the plan period i.e. by 2039/40.

4 General DM policies

4.1 Within this section of our reps we would like to comment upon policies CL3, HE1 and HOU5.

a) CL3 Sustainable Buildings and Energy Use

4.2 Whilst Wates supports the Government's approach set out in the Future Homes Standard, we note that the Government have set out a clear roadmap as to how low carbon homes will, alongside the decarbonisation of the national grid, ensure that the Government can meet its commitments to net zero by 2050; and that the way forward being taken by the Government recognises that the improvements in energy efficiency of new homes should be a transition which ensures that new homes continue to come forward to meet housing needs whilst still being sufficiently challenging to significantly reduce the carbon emissions of new homes from 2025. This is set out explicitly in the Written Ministerial Statement of the Minister of State for Housing on the 13th December 2023, when he indicated that:

*'The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, **the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.** The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale. Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:*

That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.

The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).'²⁰

4.3 Given the above, whilst the aspirations in policy CL3 are worthy and Wates are committed to the delivery of Zero Carbon Ready Homes/ Carbon Neutrality on all their sites, wherever it is practical and viable to do so, there is in our opinion no need for additional standards to be placed on developments through additional Local Plan policies that vary from that required in national government guidance. The plan has to acknowledge the implications of the transitional period and the need for flexibility during this period, in accordance with the aims and objectives of national policy. As such we would suggest that policy CL3 revert to the requirements set out in Building Regs rather than KWh/m²/yr.

²⁰ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/HCWS123>

b) HE1 Open Space and Recreation

4.4 We note that the open space standards set out in policy HE1 equate to the provision of 3ha of open space per 1,000 population, so for a development of 1,070 dwellings would generate a need for 7.7ha (assuming 2.4 persons per dwelling)²¹. This together with Sangs requirement of 8ha per 1000 new residents i.e. 20.5ha²², which will need to include a suitable circular walking route of between 2.3-2.5km, the need for a significant area of high quality and accessible Green Space in the south and west of the site and the delivery of 10% BNG will result in at least 38% of the sites 73.23ha²³ being given over to open space and recreation²⁴. It is thus important that the Council clarify the extent to which the requirements of policy HE1 will be able to be used as dual purpose areas so that as proposed within the SHELAA the site retains 46.23ha²⁵ of developable land within which to deliver the residential, employment, educational and community uses proposed.

c) HOU5 Provision of Housing to Meet our Needs

4.5 Whilst having no objection in principle to the aims and aspirations of policy HOU5, we would question the proposed affordable home ownership mix being promoted at para 4.399 of the Reg 18 Stage 2 Plan. This category will, we assume, include First Homes. The suggestion, as reproduced below, that so many are 3 bed / 5 person (+) is we feel likely to lead to issues of deliverability for First Homes.

	1 bed / 2 person	2 bed / 4 person	3 bed / 5 person	4+bed / 6 person
Market housing	5%	35%	40%	20%
Affordable Ownership	20%	40%	30%	10%
Affordable Rented	35%	35%	25%	5%

4.6 Having regard to the tenure split of the affordable housing set out in para 5.363 of the Reg 18 Stage 2 Plan, 1,070 dwellings would at 30% generate 321 affordable dwellings. Of these 25% (64) would be First Homes, of which 30% (19) would be 3 bed dwellings and 10% (6) 4 bed dwellings. 80% of the remainder (205) would be affordable/social rented and 20% (52) intermediate housing.

4.7 Para 66 of the NPPF is clear in that *'Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the total number of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups'*. Whilst annex 2 of the NPPF defines *'discounted market sales housing'* and *'other affordable routes to home ownership'* as being at least 20% below local market value.

4.8 Para 2 of the PPG on First Homes (Reference ID: 70-002-20210524) makes it clear that:

- a) a First Home must be discounted by a minimum of 30% against the market value.
- b) after the discount has been applied, the first sale must be at a price no higher than £250,000 (or £420,000 in Greater London).

²¹ $1070 \times 2.4 = 2,568 / 1000 \times 3 = 7.704$

²² $1070 \times 2.4 = 2,568 / 1000 \times 8 = 20.54$

²³ The site comprised 67ha under Wates control and 6.23ha under Barratts control – see SHELAA ref 82 and 285.

²⁴ Comparable figures for the Wates only development of 850 dwellings would be 6.12ha of open space and 16.32ha of SANG which in total would be 33% of the Wates site.

²⁵ The site SHELAA suggests 40 ha of the land under Wates control and all 6.23ha of the land under Barratts control is developable.

The governments guidance on First Homes goes on to explain that in Para 4 (ID: 70-004-20210524) that: *'the First Homes Written Ministerial Statement does give local authorities and neighbourhood planning groups the discretion to require a higher minimum discount of either 40% or 50% if they can demonstrate a need for this.'* My emphasis

4.9 Having regard to the above, the proposed unit mix advocated in policy HOU5 will, given the requirement for so many 3 and 4 bed houses, be hard to deliver even at a 50% market value reduction given local values. Furthermore, the effects of delivering at this level of discount needs to be assessed in the viability appraisal to ensure it is achievable. Without any evidence to support the viability of this approach, said policy is totally unjustified and thus unsound.

5 The Infrastructure Delivery Plan (IDP) and Strategic Sites Viability Testing

5.1 It is noted that the IDP in reviewing site SA6, has a number of indicative costs set out as to be calculated following further feasibility work and engagement with the likes of Hampshire CC; and that irrespective of the above, costs are at present running at circa £15 million with a further £5.4 to £10.8 million required to address the issue of nitrates. This equates to circa £18,700 per dwelling, assuming the lower nitrates figure and is thus significant when taking on board the current CiL rates as well (£212.82sqm).

5.2 Having regard to the infrastructure requirements set out in the IDP, we note that section 4 of the Strategic Sites Viability Testing report in table 4.13.1 suggest a flat rate highways contribution of £6,517 without any clarity as to how this has been calculated, suggests an education contribution that does not reflect that set out in the IDP, and suggests a NF SANG figure were none is provided in the IDP. Not only is this inconsistency with the IDP of concern, but the fact the Strategic Sites Viability Testing does not, according to para 4.12, take on board the effects of CiL charging rates on viability of even greater concern such that we would ask that in moving forward the council and their viability consultants meet with the promoters of the strategic sites to ensure the assumption in the Strategic Sites Viability Testing report are realistic and that said report and the IDP are consistent.

5.3 In addition to the above sales values at £5,036 per sqm are in our opinion circa 10% higher than they should be for this area.

6 Conclusions on Reg 18 Stage 2 Plan

6.1 Whilst we are supportive of the plan in general, and its overall strategy we do have some queries on the local housing need and overall housing requirement, especially when factoring in the DtC and unmet housing needs. Likewise, we have some concerns over the scoring of Velmore Farm in the SA and the assumptions made in the Viability Assessment. Our comments on these, as well as policy SA6 are however associated with our desire to ensure the plan is effective, justified, and consistent with national planning policy. Our concerns are we believe, capable of resolution by a simple review of the evidence base so as to justify the position being advocated.

6.2 We also have specific concerns about policies CL3, CL4, HE1 and HOU5, all of which we do not believe to be properly justified or effective as drafted.

To conclude, subject to the comments above, we support the Reg 18 Stage 2 Plan and the proposed allocation of the land at Velmore Farm, Valley Park for strategic scale expansion. We believe that the development of this site can come forward in a timely way to help accommodate the housing needs of the area, and that it can deliver tangible benefits for the local community in terms of much needed family sized housing, affordable housing, and starter homes, as well as accommodation for

the elderly, and a community hub/ local centre providing retail, leisure and community facilities, as well as land for employment provision, potential land for a new primary school, significant areas of high quality and accessible green space, new sports facilities, new play facilities enhanced pedestrian and cycle links, biodiversity net gains and SANG. It would also contribute towards the expansion of existing educational facilities, improvements to the strategic highway network, as well as local routes, improvements to public transport provision, and appropriate mitigation for the Solant SPA and River Itchen SAC.

Furthermore, not only can said development be accommodated without any adverse environmental impacts but provide an opportunity to provide for significant environmental improvements.

In the context of the above we would like to highlight Wates desire to continue to work with Test Valley Borough Council on the delivery of this site, and to this end would welcome the opportunity to meet further with officers to discuss our reps and the merits of entering into a Statement of Common Ground moving forward.

Yours sincerely

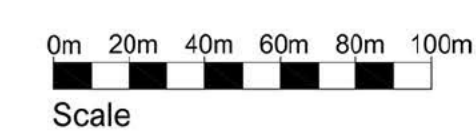



JUDITH ASHTON
Judith Ashton Associates

Encl

Updated Masterplan for land at Velmore Farm – drawing 2571-C-1007-SK-1 Principles Plan

C.c. Paul Thomas – Wates Developments Ltd



Client: Wates Homes		Drawing Title: Principles Plan				Project No' 2571	Class C	Dwg No' 1007	Status SK	Rev 1				
Project: Velmore Farm, Chandlers Ford, SO53 3PX		Scale: 1:2000 @ A1												
Revision	Drawn	Check	Date											
1	TJ/RC	TJ	25.03.24											

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