
Representations to Regulation 18 (Stage 2) Consultation: Test Valley Borough Council

Prepared for: Vistry Group



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1. Introduction

Purpose

- 1.1. This document provides representations on behalf of Vistry Group ('Vistry') to Test Valley Borough Council on the Draft Local Plan in relation to two sites located at Palestine, Grateley Station, in the northern part of the Borough. For simplicity in this document, references in this document to 'Grateley' refer to the village as a whole. The Local Plan ('LP') is at Regulation 18 ('R18') Stage 2 public consultation stage and, based on the Council's published timetable, is due for adoption in Quarter 2 2026. This R18 provides a whole draft plan with strategic policies, the proposed settlement hierarchy, new development management policies and draft allocations for meeting the District's needs for housing, employment, retail, and other uses.
- 1.2. Vistry considers these sites well-placed within the District for making a significant contribution towards housing needs as well as other key objectives in the emerging Local Plan. The sites have previously been promoted by Drew Smith and Countryside, now part of Vistry, through the Regulation 18 Stage 1 consultation (listed below) and were also submitted in the Strategic Housing and Economic Land Availability Assessment ('SHELAA') and have the following references:
- '386' – Land north of Hill View Farm, Palestine, Grateley
 - '387' – Land north of Streetway Road, Palestine, Grateley
- 1.3. The sites had an assessed capacity of up to 160 dwellings in the next 5 years by TVBC, which we refer to later in this representation. Whilst presented together, each site can come forward as individual sites.

Previous Representations

- **Regulation 18 Stage 1 consultation of the Draft Local Plan (April 2022) (Drew Smith)**

Submission Pack:

Main Representations Document 7 April 2022, supported by an overall vision document and the following appendices:

No.	Title	Site	Author
1	Heritage note	Streetway Road	Pegasus
2	Heritage note	Hillview Farm	Pegasus
3	Archaeological Survey Report	Streetway Road	SUMO survey
4	Archaeological Survey Report	Hillview Farm	SUMO survey
5	Ecological technical note	Streetway Road	Tyler Grange
6	Ecological technical note	Hillview Farm	Tyler Grange
7	Flood risk and drainage technical note	Combined	Markides

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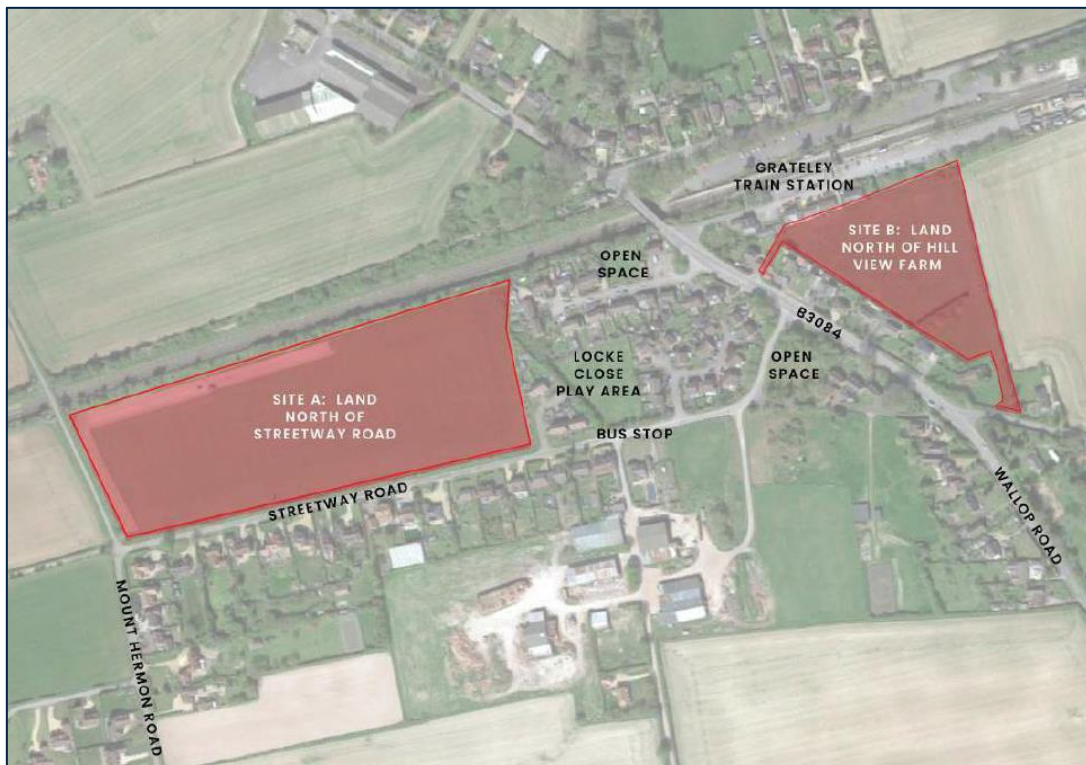
No.	Title	Site	Author
8	Phase 1 desk study (n.b. 3 separate files)	Streetway Road	Ground & Water
9	Phase 1 desk study (n.b. 3 separate files)	Hillview Farm	Ground & Water
10	Phase 2 Investigation report (n.b. 2 separate files)	Streetway Road	Ground & Water
11	Phase 2 Investigation report (n.b. 2 separate files)	Hillview Farm	Ground & Water
12	Noise constraints assessment	Streetway Road	Tetra Tech
13	Noise constraints assessment	Hillview Farm	Tetra Tech
14	Transport technical note and preliminary access	Combined	Markides
15	Landscape technical note	Combined	Pegasus
16	Utilities report	Streetway Road	Atkins
17	Utilities report	Hillview Farm	Atkins

- 1.4. The vision document, submitted to the April 2022 Regulation 18 Consultation provides supporting evidence alongside further technical reports demonstrating the sites' sustainable credentials and suitability. There are no technical considerations that would prohibit the sites being delivered (individually or in combination).

2. About the sites

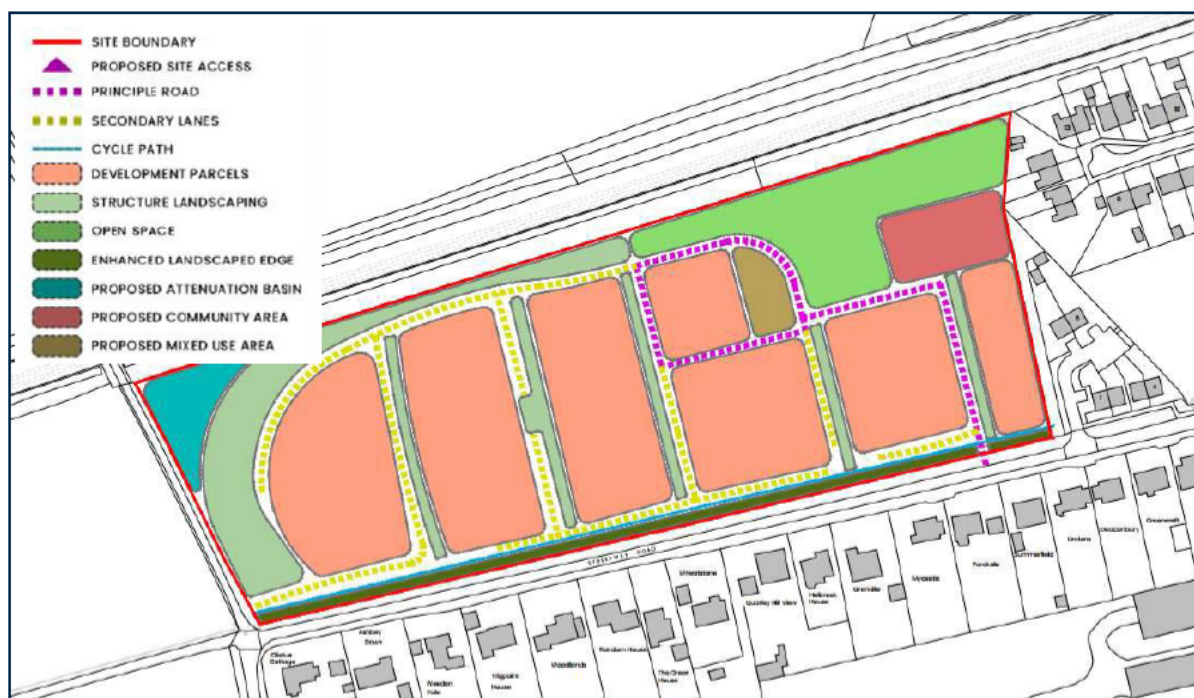
- 2.1. Both of Vistry's sites are located close to Grateley Station, which forms part of the village of Grateley, approximately 7 miles southwest of Andover, and falls within north western Test Valley. South Western Railway operates an hourly service between London Waterloo and Salisbury stopping at Grateley. Andover and Salisbury are short 7 minute and 15-minute journeys by train respectively.
- 2.2. Land North of Streetway Road (Site A) is rectangular in shape and is clearly defined by developed features on all sides including Streetway Road to the south, Streetway Close to the east, the railway line to the north, and a lane to the west. The site is accessed from Streetway Road, which leads directly to the B3084 and Grateley Station.
- 2.3. Land North of Hill View Farm (Site B) is triangular in shape and is largely enclosed by existing development. To the southwest it adjoins properties on Cholderton Road, comprising mainly of 2- storey detached dwellings of late-20th century origin. To the north is a row of railway cottages dating from around the early 1900s. To the east the site is adjoined by agricultural land, beyond which is a substantial depot operated by CA Stevens, which incorporates bulk storage and haulage, aggregates, and inert waste recycling. Grateley Railway Station is directly adjacent to the site to the north. The Hill View Farm site is accessed from Old Stockbridge Road and Cholderton Road. Both roads are part of the B3084, which connects to the A343 and A303.

Figure 2.1: Location of sites in context of Grateley Station



2.4. The broad design framework for the Streetway Road site is shown below:

Figure 2.2: Overall concept plan for Streetway Road



2.5. Key aspects of the provisional design are:

- Provision of around 115 new homes
- Non-residential uses to support the local community's needs, which may include retail, commercial or community facilities.
- Multiple Use Game Area (MUGA)
- Significant and high-quality areas of public open space, including existing tree and hedgerow planting, ecological mitigation measures and sustainable drainage systems.
- Primary point of access via a new priority junction onto Streetway Road with pedestrian footpaths brought into the site to create and maintain the green verge.

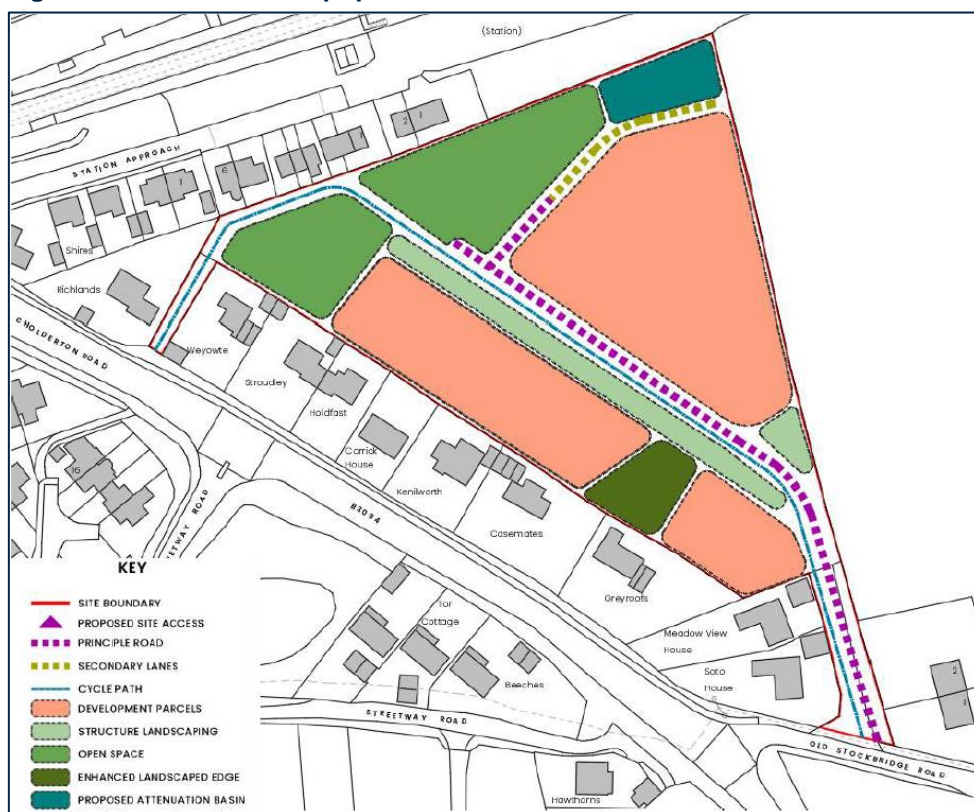
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Proposals for Hill View Farm

2.6. The broad design framework for the Hill View Farm site is shown below:

Figure 2.3: Overall concept plan for Hill View Farm



2.7. Key aspects of the provisional design are:

- Provision of around 45 homes
- A range of dwelling sizes to accommodate a growing need for all ages in the area.
- Potential for a new play area
- Significant and high-quality areas of public open space, including existing tree and hedgerow planting, ecological mitigation measures and sustainable drainage systems.
- Primary point of access via existing junction along Old Stockbridge Road
- Providing pedestrian connectivity through the site from Old Stockbridge Road to Cholderton Road
- Direct access for pedestrians and cyclist to Grateley Railway Station.

2.8. Further presentation of design analysis, images and technical information for both sites is included in the accompanying Vision Document and appendices submitted with these representations.

3. Representations on the Draft Test Valley Local Plan

Overall response to Test Valley Regulation 18 Stage 2 Local Plan

- 3.1. This section sets out Vistry's principal comments on the draft Test Valley Local Plan (hereafter referred to as 'LP').

Comments on Chapter 1: Introduction

- 3.2. TVBC adopted its Revised Local Plan DPD on 27 January 2016. The Revised Local Plan DPD sets out the long-term strategic plan for development within Test Valley Borough, and includes the strategic vision, objectives and the key policies needed to achieve sustainable development in Test Valley to 2029. The emerging Local Plan, is due to be adopted in Quarter 2 (April – June) 2026 (in accordance with the currently approved Local Development Scheme (LDS)). **Paragraph 1.40** of the Reg 18 Stage 2 Draft Local Plan states that the Council is committed to adopt the Plan earlier than that set out in the LDS. The new Local Plan will set out policies and guidance for development of the Borough over the next 15 years to 2040, in line with the minimum requirements set out in the National Planning Policy Framework ('NPPF') 2023.
- 3.3. Vistry considers that the plan period should be extended to 2042 to provide a more realistic adoption timescale and allow for any unexpected delays to adoption and sustain the policy requirement for a 15-year plan period as required by the NPPF.
- 3.4. If the emerging Plan is adopted later than 2026 as projected by the Council in its LDS, there will only be 14 years (April 2026 to 31 March 2040) following adoption. If, as seems more likely, the emerging Plan is not adopted until later 2026 or even 2027, there will be potentially only 13 years of the plan period remaining. As such, Vistry considers that in order to be found sound at Examination, the plan period should be extended to at least 2042.
- 3.5. If the plan period was extended by two years based on the proposed housing requirement of 478 dpa, the overall requirement over the extended period would increase by 1,100 homes to 11,100 homes and increase by 627 homes in Northern Test Valley (NTV) to 6,897 homes.

Comments on Chapter 2: 'Vision , Key Challenges and Objectives'

- 3.2. **Paragraph 2.10:** It is critical that the TVBC's timescales are adhered to, with adoption of the new plan not further delayed beyond Q2 2026. By then, 10 years will have elapsed since the adoption of the extant plan in 2016, and there would only be 3 years remaining on the current plan (which expires in 2029). Although TVBC undertook an interim review in 2021, that has produced no significant change, despite the context for planning having evolved significantly over the recent period. This includes changes to national planning policy and new environmental legislation, as well as socio-economic trends emerging from Brexit and the pandemic.

Vision

- 3.3. Overall, Vistry is supportive of the vision in the LP40 in terms of recognising the key issues facing the District and its prioritisation of providing access to good quality homes for all, delivering employment and supporting infrastructure, encouraging inclusive communities in sustainable locations, developing thriving town centres, and safeguarding the diverse natural built and cultural resources, whilst tackling climate change. We believe that our approach at Grateley is fully compatible with the Council's vision.

Climate change

- 3.4. **Paragraph 2.27** states that the LP40 will contribute to reduced emissions, by both minimising the impact development has on emissions, and adapting to manage impacts. Vistry fully support this approach. The proposals at Grateley would contribute by reducing the need to travel by private car, by clustering the development at a public transport hub, and providing new facilities for the use of the whole village.
- 3.5. Vistry would also use masterplanning to support sustainable energy. The shape and layout of the Streetway Road site in particular, with its east-west orientation, provides opportunities for solar gain through building orientation as well as active PV generation on south-facing roofs.
- 3.6. More generally, Vistry Group are fully committed to responding to the sustainability agenda and driving down carbon emissions in our developments. Vistry are committed to reducing the footprint of its new developments both at the point of construction, as well as along the supply chain.
- 3.7. All of Vistry's new developments consented after 2025 will be all electric, with no gas appliances installed in new homes, and each new home will have its own dedicated charging point for electric vehicles.
- 3.8. All of Vistry's new homes built from 2025 will be **Zero Carbon Ready** (with a reduction of 75-80% CO₂ on new homes built and all of Vistry's new homes built from 2030 will be **Net Zero Carbon** for regulated energy, and then from 2035 **Net Carbon Zero** for both regulated and unregulated energy. Vistry already has extensive experience of building out Zero Carbon developments, including our recent partnerships scheme at Europa Way, Warwick, which uses high-performance fabrics; timber frames; air source heat pumps (ASHP); Solar PV panels; and Waste Water Heat Recovery (WWHR).
- 3.9. Vistry is one of the largest Timber Frame Housebuilders in the country, and own and operate three dedicated manufacturing plants in the UK producing the frames for its developments. Use of timber frames in housebuilding:
- Reduces the amount of materials used by over 45%
 - Reduces waste by over 50%
 - Reduces HGV movements to and from the constructions by over 40%
 - Significantly reduces the time it takes to build new homes.

Strategic Partnerships

- 3.10. Vistry Group have strategic partnerships with the Hedgehog Preservation Society, the Bat Conservation Trust, and the Bumble Bee Conservation Trust.

Communities

- 3.11. **Paragraph 2.32** states that *‘The sustainability of our communities is linked to their ability of having easy and safe access (by active or sustainable modes of transport, where possible) to facilities, services and amenities to serve economic and social needs, including shopping, recreation, education, and employment’*. Vistry’s proposals at Grateley precisely align with this objective, involving development at one of the most accessible locations in the Borough, whilst providing for those facilities not currently available in the village.
- 3.12. **Paragraph 2.29** notes that in rural areas, *‘It can be a challenge to help sustain the range of existing facilities and infrastructure and to facilitate the enhancement of them is an even bigger challenge.’* **Paragraphs 2.30 and 2.31** echo this by seeking to prioritise population increase in locations that can continue to meet daily needs.
- 3.13. Vistry agrees but would urge TVBC, in addressing the challenge, to take a nuanced and proactive approach – focussing development at locations with:
- (a) the fewest constraints;
 - (b) the best ‘hard’ infrastructure – specifically, active passenger railways which realistically cannot be delivered anew anywhere else, and;
 - (c) the greatest capacity to grow sustainably in the long term; rather than a more passive or reactive approach based around a hierarchy of settlements selected by the facilities that happen to be there at a point in time.
- 3.14. Our detailed expansion of this point is set out further below in this document, under the settlement hierarchy.

Built, historic and natural environment

- 3.15. **Paragraphs 2.42 and 2.43** rightly seek to protect the rich environment of the Borough. To achieve this whilst also meeting development needs will require very careful selection of locations. We note that Grateley, and particularly Grateley Station, is one of the least constrained settlements in the Borough, when factoring in the full array of planning considerations, and considerably less constrained than many of the settlements at Tier 2 and Tier 3. Grateley should therefore be a highly favoured candidate for future development. Our detailed expansion of this point is set out further below in this document, in response to the settlement hierarchy.
- 3.16. **Paragraphs 2.44-2.47** rightly identify the protection of the numerous ecological assets of the Borough as a ‘pressing need’. Several points should be noted in respect of Grateley:
- Grateley is unusual in Test Valley in being entirely free of ecological designations, meaning the risk of new development causing direct harm to such designations is lower than a large proportion of alternatives.
 - The closest ecological designation of any kind (Porton Down SSSI/SPA), circa 2km from Grateley Station, is not accessible to the public due to being an MOD Danger Area.

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- Unlike much of the Borough, Grateley stands outside of the 13.79km 'zone of influence' around the New Forest Special Protection Area. This was identified in 2021 as the area within which mitigation is required in relation to recreational pressures on the New Forest from new residential development. Although a process has been identified to secure this mitigation, it is far preferable not to need it in the first place.
- The two sites promoted by Vistry have a notably low ecological baseline, offering ample potential to secure ecological enhancement and Biodiversity Net Gain.

3.17. **Paragraph 2.48** concerns nutrient impacts on designated conservation sites in the Solent. The Streetway Road site (the larger of the two sites) is under an intensive agricultural use (the growth of turf), meaning that cessation of this use in favour of housing may entail a reduction of nutrient impacts on the relevant catchment, enabling neutrality to be attained more readily than it would otherwise.

3.18. **Paragraph 2.49** refers to flooding, and in particular groundwater flooding, which is a serious issue in the Borough on account of local geology, and a detailed *Strategic Flood Risk Assessment*¹ has covered this topic alongside other types of flooding assessed by the Environment Agency. One striking issue to note is that virtually every settlement in Test Valley is affected by this flood risk, except Grateley, where no flood risk is identified. This is on account of the historic pattern of development, whereby most settlements in the area tended to grow along chalk stream valleys and at spring lines. Grateley is a rare exception to this, being situated in the centre of one of the largest areas of open chalk plateau in the Borough.

Health, Wellbeing, and Recreation

3.19. **Paragraphs 2.52-2.53** rightly look to 'encourage active lifestyles and enhance health and wellbeing, by providing opportunities for recreational, cultural and community activities, through the provision of open spaces, access to the countryside, sports, leisure and other community facilities and services'. Vistry agrees with these principles, and is aiming to deliver a significant gain to these aims through its proposals at Grateley. As set out in the accompanying Vision Document, these include significant community facilities, sport and recreational facilities, and footpath links in addition to housing.

Design

3.20. As set out in the boxed text on **page 24** of the consultation document, the Council wishes to deliver 'safe, attractive, integrated and well-designed environments', to 'respond positively to local context and character', and to 'strengthen the sense of belonging and identity within Test Valley by supporting enhancements to the distinctive towns and villages of the Borough'.

3.21. Vistry fully supports these aims and as set out in the accompanying Vision Document, it has set out a framework to bring forward high quality developments that respond positively to the local character and context of Grateley, as well as delivering significant new facilities to the village of Grateley in highly accessible locations, aiming to improve the overall quality of life in the village.

¹ <https://testvalley.gov.uk/assets/attach/2621/TVBC-SFRA-Tiles-A-to-H.pdf>

Economy, Prosperity and Skills

- 3.22. As set out in the boxed text on **Page 25** of the consultation document, the council seeks in the Local Plan to promote a '*vibrant and resilient local economy*', noting the particular aim that '*future sustainable growth and innovation in green, high technology and other sectors can provide for a range of job opportunities and where businesses and individuals can thrive*'.
- 3.23. On this theme, we would note that alongside housing, Vistry is explicitly proposing to deliver flexible space capable of an employment-generating role. This will contribute to local economic vitality. By positioning new homes at Grateley close to a mainline railway station, residents will be able to access a diverse range of skilled jobs across the region without the need for private car journeys.
- 3.24. According to the *Enterprise M3 Towns Analysis* (2019)²;
- Basingstoke has the largest number of business units in the LEP area, at 5,100. Basingstoke is 30 minutes from Grateley by direct train.
 - Basingstoke also has the largest amount of office floorspace (390,000m²);
 - Andover (7 minutes from Grateley by train) has the greatest amount of industrial floorspace in the LEP area (720,000m², closely followed by Basingstoke at 670,000m²);
- 3.25. The above report identifies 8 towns as being particularly notable 'Employment Centres' within the LEP geography: Andover, Basingstoke, Farnborough, Farnham, Guildford, Whiteley, Weybridge, and Woking. Three of these (Andover, Basingstoke, and Woking) are directly accessible from Grateley by rail. Farnborough and Guildford can also be accessed in approximately 1 hour with a single change, and Weybridge approximately 1 hr 15 minutes.
- 3.26. Relative to its size, Grateley has been host to significant employment sites, including the Grateley Business Park (circa 4,690 square metres of floor space), and the Stevens Yard premises on Old Stockbridge Road. Given the accessibility of the village, particularly by rail but also by the strategic road network (A303, A343 and the connecting B3084), there is potential for such established sites to grow their employment role further, particularly if stimulated with new housebuilding and investment in the community.
- 3.27. Grateley is close to Porton Down, which is one of the largest single employment campuses in the sub region. Porton Down is host to several thousand employees relating to the DSTL (the Defence and Science Technology Laboratory), Public Health England, and the UK Health Security Agency). The site is developing further with a new *Porton Science Park – Collaboration Innovation Centre*, for which funding has been secured from central government, local government (Wiltshire Council) and the Local Enterprise Partnership³. Although Porton Down is not within Test Valley, Grateley is one of the nearest villages, and Grateley Station is the closest point of railway access to the campus (closer than Salisbury).

²

https://enterprisem3.org.uk/sites/default/files/2020-02/EM3%20Towns%20Study%20Final%20Report%20v4.0%20Part%201%20Data%20and%20Classification%2020.1.19_0.pdf

³<https://cms.wiltshire.gov.uk/documents/s184235/Porton%20Science%20Park%20-%20Collaborative%20Innovation%20Centre.pdf>

- 3.28. For the reasons above we therefore agree with the direction of **Paragraphs 2.66-2.68**. To be consistent with the above, Test Valley must consider formal housing-led site allocations at Grateley.

Comments on Chapter 3: 'Spatial Strategy'

Overarching aims

- 3.29. **Paragraph 3.1** of the LP40 affirms a commitment to delivering growth that is both sustainable, and benefits communities. Vistry's proposals have been configured to attain both: the first by virtue of the location and the design; and the second by virtue of the mixed-use approach that is being taken, as set out in more detail within the accompanying Vision Document.
- 3.30. **Paragraph 3.3** reaffirms the need to align with the National Planning Policy Framework (NPPF) and its three domains of sustainability: economic, social, and environmental. This is not contentious, but as set out below we believe that the spatial approach falls short of its potential under each of the three.
- 3.31. **Paragraph 3.4** states that the strategy 'Identifies the distribution of development in the Borough setting out where we will meet our various needs, ensuring infrastructure is aligned with development and supporting opportunities for local communities to plan to meet their needs.' Though agreeing with the principle here, we would raise two concerns:
- (a) The text refers only to aligning infrastructure with development. What seems to be missing is the need where possible to align development with infrastructure, especially where that infrastructure is both of strategic importance, and not deliverable anywhere else in the Borough. We of course refer here to the mainline railway station at Grateley.
 - (b) By aligning infrastructure with development currently identified within the LP40, this will only be to the benefit of Tier 1 and 2 settlements, with Tier 3 settlements missing out. This is confirmed in the overarching priorities for NTV.

Spatial Strategy

- 3.32. Vistry accepts that in producing the Local Plan, it is necessary to understand the nature of individual settlements in depth in order to make informed decisions, and in this sense there is agreement with **paragraphs 3.19- 3.20**.
- 3.33. However, we have concerns with **paragraph 3.14** as it appears to be concerned with distributing housing development alone, without recognising that this can be accompanied by new infrastructure. Paragraph 3.14 refers only to locations where there 'are' key facilities, as opposed to where these could be positively planned for along with housing growth. This is an important distinction.
- 3.34. **Paragraph 3.15** states that much of the Borough is rural with some villages providing for immediate needs, and that the proposed spatial strategy will support these rural settlements to develop in a sustainable manner through enabling rural communities to deliver their own needs and priorities. However, by not allocating sites in the LP within the most sustainable rural settlements, and relying on Neighbourhood Plans

to deliver minimal growth (in most cases with a requirement of 10 units), this will not benefit these rural settlements in the long-term.

Settlement Assessment

- 3.35. As set out in **paragraphs 3.22-3.28**, the proposed settlement hierarchy approach implies that development allocations in the LP would be concentrated at settlements which have retained certain facilities/services at a particular point in time, using base data from 2021. This has some superficial logic, but it carries risk and could potentially be counterproductive. Particularly given that 'key facilities' include primary school, food store, outdoor sports facility and community facilities, but public transport provision has been excluded.
- 3.36. We have concerns with the way the methodology attributes equal weighting to different facilities, with the judgement on sustainability based on the total number in situ. However, certain facilities and services provide higher levels of reliance for residents to service their daily needs than others. Some weighting system should be applied for it to be a true sustainability metric underlying a settlement hierarchy.
- 3.37. New development can support and boost facilities and services in villages, and it is correct to factor them into spatial plan-making. But as acknowledged by TVBC in the Settlement Hierarchy Assessment, any survey of village facilities reflects a single point in time. Inevitably provision will change over the plan period, and changes are likely before the plan is even adopted. Therefore, in determining the future role of settlements, there is risk in attaching too much weight to the presence of facilities at a point in time: a facility such as a shop, post office or pub may have closed before the arrival of new residents that might have supported it. Provision is also likely to reflect market conditions i.e., availability for start-ups and small and medium-sized enterprises (SMEs) to acquire investment for leases, etc.
- 3.38. To the extent that facilities and services are used to inform the spatial hierarchy and distribution of development, a more nuanced approach should be taken, taking into account the possibility of making housing-led but mixed-use development allocations in targeted locations. Such an approach would be particularly appropriate at Grateley.
- 3.39. Our main concern is that the focus on facilities and services overlooks more important considerations of environmental impacts and deliverability, particularly in the villages of the Borough. Without a more complete analysis of these factors, the settlement hierarchy risks distributing development in inappropriate and potentially harmful ways, contrary to other objectives of the plan. For clarity we outline our concerns against key settlements below. For the avoidance of doubt, we do not object to the concept of growth in these locations; we merely highlight the relative difficulty in finding suitable sites and achieving delivery.

Constraints and sustainability issues at Tier 2 settlements

- 3.40. **North Baddesley**, though large, is almost entirely surrounded by hard constraints. Running clockwise from the north, it is firstly enclosed by a "Local Gap" policy (E3), which over successive Local Plans has delineated North Baddesley from Romsey. Then to the north of the A27 it is enclosed entirely by areas of woodland designated as SNCI. To the east and south east, there is then another Local Gap distinguishing the settlement from Valley Park / Chandlers' Ford, which also overlaps with numerous further SNCIs. Much of the land due south of the settlement, along Hoe Lane / Rownhams Lane is designated as Open Access land, with high-voltage overhead lines constraining other areas. Areas to the west / south west, in turn, are

already allocated in the Revised Local Plan and subject to a permission being implemented. Overall, there is very little scope for expansion of this village.

- 3.41. **Stockbridge**, though an important service hub, is also highly constrained. Areas of flood risk rule out direct expansions from the central part of the village, and the Conservation Area extends well beyond it. The scenic value and topography of the area also are a significant limit on future large-scale development out of the existing 'envelope' of the village. Whilst Stockbridge has a number of higher-order facilities along its High Street, and it has a secondary school, it is geographically remote, and lacks any major employment base or access to employment opportunities without reliance on the private car.
- 3.42. **Valley Park** is extremely constrained by woodland and the district boundary, meaning that beyond the draft allocation site at Templars Way, it would be difficult to achieve further large developments without significant environmental harm..
- 3.43. **Wellow** is highly constrained to future development with the whole of its southern edge being enclosed by the boundary of the New Forest National Park Authority. Development sites might be identified on the northern side, however they would still have to address a likely greater impact on the habitats of the New Forest.
- 3.44. **Hurstbourne Tarrant and Ibthorpe** are located entirely within the National Landscape, which is highly protected under the NPPF and established policy. The village is located in a steep picturesque valley setting, with numerous Listed Buildings, a large Conservation Area, through which the River Bourne creates an extensive area of flood risk. In combination major development would be extremely difficult. As noted earlier, although the village has a shop, this relates to a petrol station on the A343 which passes through rather than to the inherent sustainability of the village. Public transport links are limited to a corresponding bus link between Andover and Newbury.
- 3.45. **Shipton Bellinger** has reasonably good provision of services, but as outlined above, its public transport provision is limited to an unattractively slow bus link to Salisbury. The village is also enclosed to a great extent by MOD training areas, precluding potential directions of growth. Given the position of the village on the A338 and close to the A303, and in the absence of a rail service, the residents of any new homes would be particularly likely to commute by private car.
- 3.46. **Charlton** is not severely constrained, although western edges are under a well-established 'Gap' policy, and northern edges approach close to the National Landscape. It may be more appropriate and practical to classify this settlement as part of Andover.
- 3.47. **Chilworth** is also almost entirely constrained by established 'Gap' policy and mature woodland which is under ecological designations. These factors suggest it is not a suitable location for major growth in the Local Plan.
- 3.48. Overall, the majority of 'Tier 2' settlements are highly constrained; certainly, more so than Grateley, and this analysis is also true of Ludgershall, a Wiltshire settlement that this Local Plan effectively draws into the Test Valley hierarchy at this level. Despite having (in TVBC's terms) relatively good facilities and services, none have immediate access to a railway station, placing a greater reliance on relatively poor bus services and/or the car. Only 2 of the 9 (Stockbridge and Shipton Bellinger) are freestanding settlements outside of

both the New Forest buffer zone and the National Landscape. Overall, opportunities to deliver sustainable growth through the plan period in 'Tier 2' are very limited.

Constraints and sustainability issues at Tier 3 settlements

- 3.49. Similar issues can be observed at this level in the proposed hierarchy, which includes Grateley as well as Abbots Ann, Broughton, Goodworth Clatford, Upper Clatford and Anna Valley, King's Somborne, Longparish, Nether Wallop, Middle Wallop and Over Wallop, and West Tytherley.
- Unlike Grateley (Station), all of them have an extensive **Conservation Area** which in most cases defines a large proportion of the built-up area and extends into the wider setting. Accompanying this are large numbers of important listed buildings.
 - With the exception of **West Tytherley** which is separately affected by localised groundwater issues, all of them are valley floor settlements affected by extensive areas of **flood risk**, and **ecological considerations** around the river systems are also important constraints.
 - **Abbots Ann, Upper Clatford and Anna Valley** are extremely close to Andover and abut the established 'gap' policy. Although these villages would have good access to services in Andover, significant development allocations could involve 'rolling back' the gap, whilst new residents would be as likely to support facilities in Andover as in the villages themselves.
- 3.50. Again, none of the 'Tier 3' settlements benefit from a railway station and thus all have been classed as having 'medium' quality public transport, rather than 'high' as at Grateley.

Summary of settlement hierarchy matters

- 3.51. From the above it is clear that the majority of 'Tier 2' and 'Tier 3' settlements are highly limited in their potential to deliver sustainable growth through the plan period. In contrast at Grateley,
- There are no ecological designations of any kind within or around the village. The Porton Down SSSI/SAC exists approximately 2km to the south west, but it is not accessible to the public on account of being a Ministry of Defence Danger Zone.
 - There are no landscape designations. This distinguishes Grateley from a significant number of the larger settlements, with much of the north of the Borough being encompassed by National Landscape designation, and with the larger towns (Andover, Romsey, North Baddesley and Valley Park) being subject of 'gap' policies.
 - There are no Listed Buildings or Conservation Area, with the closest statutory heritage designation being Quarley Hill Fort approximately 1km away;
 - No part of the village is at risk of flooding, as identified on the Environment Agency's Flood Risk Map (relating to rivers, the sea, and surface water)⁴

⁴ <https://check-long-term-flood-risk.service.gov.uk/map>

- 3.52. For all these reasons Vistry believe that TVBC need to fully review the SA and the Settlement Hierarchy approach to redesignate Grateley as a 'Tier 2' settlement, with an expectation of market-led housing.

Spatial Strategy Policy 3 (SS3) – Housing Requirement

- 3.53. The standard methodology dictates a local housing need for TVBC of 550 dwellings per annum which equates to 11,000 homes over the proposed plan period 2020 to 2040. From the consultation document and supporting evidence it is clear that the Council are aware that this figure is a **minimum** requirement and that they must consider whether there are any circumstances which would indicate housing needs are likely to exceed past trends.
- 3.54. The SHMA (2022) sets out that at the time of writing there were 3,167 households in TVBC living in unsuitable housing. The SHMA notes that the greatest demand in Test Valley is for 3-bedroom market dwellings (40%) and 2-bedroom affordable homes (40%). Vistry are committed to providing a range of housing sizes and tenures on site in order to meet the local need.

Unmet Need

- 3.55. **Paragraphs 2.18 – 2.23** state that the Council is engaging with all neighbouring authorities, including in relation to housing need. The Duty to Cooperate Topic Paper states that the Partnership for South Hampshire (PfSH) Spatial Position Statement (SPS) (December 2023) '*identifies a potential shortfall in identified supply of housing of 11,771 dwellings*' (page 6).
- 3.56. These 11,771 homes are currently unplanned for. The figure equates to approximately 1,000 dpa over the period 2024-2036.
- 3.57. As set out in Paragraphs 3.28-3.31 of the Housing Topic Paper, Havant Borough Council responded to the TVBC Local Plan Regulation 18 Stage 1 consultation seeking a commitment from Test Valley to accommodate Havant's unmet need (circa 2,000 homes). Whilst this request related to a now withdrawn Local Plan (Draft Havant Local Plan 2036), this unmet need is likely to still arise. Paragraph 3.30 states that '*given the geography and HMAs in South Hampshire and relative distance, we consider it is unlikely that this should reasonably be met in Test Valley*'. However, directly neighbouring authorities, such as New Forest District, are currently showing a significant shortfall in the SPS, New Forest has identified a shortfall of 5,652 homes, likely to result in significant unmet housing need.
- 3.58. The SPS sets out that Test Valley is one of the named authorities who, in the short to medium term, may be able to meet and exceed its standard method need in its respective local plan area. East Hampshire, Eastleigh, Fareham, and Winchester are also named (paragraph 6.33). The statement anticipates delivery from said authorities in the short to medium term to deliver unmet need and that long term need will be met via Broad Locations of Growth. The Broad Locations of Growth are estimated to have a combined capacity of 9,700 dwellings, leaving a shortfall of 2,071 dwellings to be delivered in other locations. It is noted that the Broad Locations of Growth are currently speculative and therefore not concrete.
- 3.59. If the emerging Local Plan is adopted as scheduled at in Quarter 2 2026, there will only be a need to review it by 2030/31 (or by 2031/2032, based on Savills estimate of adoption of the Local Plan to be expected later

than 2026). If adopted without taking into account the potential for unmet need from south Hampshire there is the distinct likelihood that Test Valley will serve no role in helping to meet this unmet need and an increased risk that the unmet need will remain unmet.

Housing Market Areas

- 3.60. Vistry is encouraged to see that 57% of the housing in the LP is directed towards NTV, resulting in a requirement for a minimum 6,270 homes, and an annual requirement of 313 homes. However, a large proportion of new allocations in NTV (1,500 out of 3,790 units) is directed towards Ludgershall, an isolated location with all key services/ facilities located in the neighbouring authority (Wiltshire). We provide further commentary in relation to the proposed allocations NA7 and NA8 at Ludgershall in the sub-section below.

Spatial Strategy Policy 5 (SS5) Neighbourhood Development Plan Housing Requirements

- 3.61. Vistry is supportive of the requirement for Neighbourhood Development Plans to make provision for a minimum housing requirement. However, to identify a minimum housing requirement of only 10 units for Grateley, which is effectively a Tier 2 settlement, is at odds with the characteristics of that place and its ability to accommodate growth sustainably.

Comments on Chapter 4: 'Test Valley Communities'

Proposed Site Allocations at Ludgershall (Northern Area Policies NA7 and NA8)

- 3.62. Draft Policy allocations NA7 and NA8 set out that two sites will deliver 1,500 dwellings and supporting infrastructure, around 40% of the total residual requirement for NTV up to 2040.
- 3.63. Ludgershall is an isolated location with the existing town (including all key services/facilities) located within Wiltshire. There would therefore be no added benefit to the local communities of Test Valley by locating a significant proportion of NTV's housing requirement on the edge of Ludgershall. The closest settlement to these sites within Test Valley is Redenham, which is identified as Countryside in the Local Plan Settlement Hierarchy and is circa 2km from the proposed allocation sites.
- 3.64. The SHELAA review of Land east of Ludgershall (NA7) affirms that *'development away from the defined settlements is unlikely to meet all of the elements of sustainable development considering access to a range of facilities'*. NA7 is circa 1.5km-3km away from the key services and facilities in Ludgershall, including Wellington Secondary School (2.9km away) and Wellington Academy Sports Centre (2.9km).

Landscape Impacts

- 3.65. Landscape is a fundamental issue impacting the Land east of Ludgershall (NA7) and Land to the south east of Ludgershall (NA8) site allocations. The NA7 site is in close proximity to the North Wessex Downs National Landscape (formerly known as an Area of Outstanding of Natural Beauty). As concluded in the Interim Sustainability Appraisal – Housing Site Appraisal of NA7, there is potential for significant effects on the setting of the National Landscape.

- 3.66. The Landscape Sensitivity Study paragraph 1.1.341 concludes for NA7 that *‘whilst the greater degree of visual containment in the northern section and the relationship to urbanising influences along the A342 road corridor locally reduce susceptibility, the relationship to the AONB is highly important and elevates susceptibility here.*
- 3.67. The Landscape Sensitivity Study paragraph 1.1.341 adds that for NA8 *‘the much more open and visually prominent southern section, with its associated intervisibility, has the highest susceptibility in view of such characteristics.*
- 3.68. *The study concludes that ‘Overall, a **Moderate-High landscape** susceptibility to change arising from the scenario, for both areas of the parcel [NA7 and NA8].’*
- 3.69. The guidance provided in the Landscape Sensitivity Study included to *‘avoid development type, form and scale that would form prominent urban sprawl in the exposed chalk downland landscape, particularly limiting the development through the south area of the parcel’.*
- 3.70. With noise constraints relating to the A342 to the south, and area of surface water flooding on the site, it is questionable, given the landscape constraints, whether approximately 350 dwellings can be realistically achieved on proposed site allocation NA7.
- 3.71. For NA8 the proposed access is clearly a constraint, and this is confirmed in the Interim SA appraisal of the draft allocation and in paragraph 4.103 of the LP document. The site access is proposed from the A342 (Andover Road), and a bridge would be required over the railway, which is used by the Ministry of Defence. This is a significant piece of infrastructure, which may take time to resolve. It is questionable therefore whether proposed site allocation NA8 is deliverable based on the access constraints, and even if the access solution is resolved, whether the approximately 1,150 homes can be delivered in the LP plan period to 2040.
- 3.72. Ultimately it is questionable whether the two site allocations NA7 and NA8 are in a sustainable location, isolated from the rest of the borough. At examination there is risk that the sites may not be able to show they are deliverable or able to deliver the quantum of housing proposed for the LP plan period. Careful consideration is needed to ensure that significant development in this location would not result in significant, adverse effects on a National Landscape and the wider rural landscape character.

Relationship with the Wiltshire site allocations at Ludgershall

- 3.73. Vistry questions whether the potential cumulative impacts of site allocations NA7 and NA8 combined with the site allocations put forward by Wiltshire Council in the emerging Wiltshire Local Plan have been properly considered. An additional circa 2,300 units will have a significant impact on local schools, heath provision, roads, and utilities.
- 3.74. It is unclear whether a Statement of Common Ground has been progressed between Wiltshire Council and Test Valley Borough Council to understand how growth of Ludgershall will be delivered in a sustainable way. If both Wiltshire and TVBC are serious about the extensions to Ludgershall, this ought to be promoted through a combined framework, with a proper vision, and a supporting Development Plan Document (DPD), a Design Code, etc.

- 3.75. Vistry questions whether there is the market demand for such significant growth at Ludgershall to be delivered in the plan period. How will the sites in Wiltshire and Test Valley be phased and what assumptions have been made in regard to delivery rates? Again, at examination there is risk that the sites may not be able to show they are deliverable or able to deliver the quantum of housing proposed for the LP plan period.

Comments on Chapter 5: 'Theme Based Policies'

Climate Change

- 3.76. Vistry supports all of the priorities set out in LP40 in relation to climate change, but emphasises the fact that greenhouse gas emissions within Test Valley arise from a range of sources. The Local Plan and associated development strategies should aim to address not just emissions from buildings but also emissions from industry and transportation.
- 3.77. **Paragraphs 5.20 – 5.22 and draft Policy CL1** emphasise the importance of how the location of development can have an effect on transport and travel related emissions and that patterns of development should enable prioritisation of walking, cycling and the use of public transport. As set out in various sections of these representations, a key way to promote sustainable travel is to align development with existing infrastructure, such as the mainline railway station at Grateley.
- 3.78. **Paragraph 5.32** states that it is essential to ensure that inappropriate development is avoided in areas at risk of flooding. One striking issue to note is that virtually every settlement in Northern Test Valley is affected by this flood risk, except Grateley, where no flood risk is identified. This is on account of the historic pattern of development, whereby most settlements in the area tended to grow along chalk stream valleys and at spring lines. Grateley is a rare exception to this, being situated in the centre of one of the largest areas of open chalk plateau in the Borough.
- 3.79. **Policy CL4** (Water Use and Management) requires all residential developments to demonstrate that they meet a water efficiency standard of no more than 100 litres per person per day unless it can be demonstrated that doing so is not technically feasible or would make the scheme unviable. Whilst Vistry is fully committed to introducing water efficiency measures, 'below 105 litres' (which is up to a 16% reduction on Part G of the Building Regulations) is deemed a more realistic, and viable target, particularly for customers to maintain post-occupation.

Ecology and Biodiversity

- 3.80. In line with the Environment Act 2021, the draft Local Plan includes a formal requirement for a minimum 10% measurable net gain in biodiversity as part of developments (Policy BI03 Biodiversity Net Gain). Vistry supports the approach set out within this section of the draft Local Plan and notes that the proposed development at Grateley will retain and create significant areas of green space on site and will provide a minimum 10% plus net gain. Furthermore, a Habitat Mitigation and Management Plan (HMMP) will be prepared in order to provide management of the site for 30 years and ensure habitats are established correctly and to the required condition.

Our Communities

- 3.81. **Paragraph 5.104** states that ‘the sustainability of communities is supported by retaining the quantity and range of services needed to support residents and businesses, particularly so for rural communities’. However, to retain or create a range of services in rural settlements there needs to be growth in those settlements to ensure those local services remain viable. By focusing on growth in the larger settlements, this will result in a negative impact on those rural communities that have an acute need for vital services to be retained or created in their community. The LP40 overlooks the possibility of planning positively to deliver and reinforce such services/facilities, and to support the long-term vibrancy and viability of rural communities.

Health, Wellbeing and Recreation

- 3.82. **Paragraph 5.274**, in support of draft Policy HE1, states that a key part of helping to encourage and facilitate healthy lifestyles is to ensure access, protection and enhancement to open spaces, the countryside, recreational and sports provision, and that it is important that new developments provide open space to meet the needs of the future residents.
- 3.83. Vistry agrees with these principles, and is aiming to deliver a significant gain to these aims through its proposals at Grateley. As set out in the accompanying Vision Document, these include significant open space, sport and recreational facilities, and footpath links in addition to housing.

Design

- 3.84. Vistry supports the wording of draft **Policy DES1**. As set out in the accompanying Vision Document, Vistry has set out a framework to bring forward high quality developments that respond positively to the local character and context of Grateley, as well as delivering significant new facilities to the village of Grateley in highly accessible locations, aiming to improve the overall quality of life in the village.

Housing

- 3.85. Vistry supports the principle of **Policy HOU2**, to enable local communities to lead on bringing forward development in their settlements.
- 3.86. Vistry supports draft **Policy HOU6**, requiring all new residential homes to be provided to Part M4(2) standard and NDSS space standard, and the requirement for major residential sites to achieve 10% of market housing to be completed to Part M4(3)A and 10% of affordable homes to be completed to Part M4(3)B standards. Vistry homes are built to NDSS standards, and the sites at Grateley would be designed to meet local needs in line with draft Policy HOU6.

4. Conclusion

- 4.1. Vistry agrees with the Council's approach of applying the nationally set 'standard method' to identify the minimum housing need to be identified in the emerging Local Plan. A continued split of two separate Housing Market Areas (HMAs) is also supported, with no comment on the revised boundary.
- 4.2. Overall, Vistry agrees with most of the detailed policies set out in the Regulation 18 Stage 2 Draft Local Plan.
- 4.3. However, there is a fundamental problem with the spatial strategy. Whilst there is a case for large-scale developments to significantly grow existing settlements, there is no apparent justification to allocate a significant proportion of the residual housing requirement for Northern Test Valley at Ludgershall. In combination with the draft allocations put forward in the Wiltshire Regulation 19 draft, this would result in growth of Ludgershall by 2,300 units across two authorities with no DPD and Design Code in place. There is a need for higher order infrastructure analysis, an assessment of cumulative effects of the growth as a whole and there should be combined consultations, as well as a Statement of Common Ground.
- 4.4. None of the above has been undertaken to date, which makes the policy highly unlikely to be found sound. This is a serious risk to the rest of the Council's strategy.
- 4.5. The solution would be to look again at actual sustainable deliverable sites, such as Land north of Streetway Road and Land north of Hill View Farm (individually or in combination).
- 4.6. Land north of Streetway Road and Land north of Hill View Farm in Grateley each:
- have unique access to mainline rail services to Salisbury, Andover, Basingstoke, London and beyond;
 - are located in one of the least constrained parts of the Borough, and within a settlement that is considerably less constrained than most 'Tier 2, Tier 3' and 'Tier 4' settlements as currently defined; and
 - are uniquely well-placed to integrate with the existing built-up area of Grateley without harm, whilst offering significant economic, infrastructure and community benefits, along with significant environmental benefits through Biodiversity Net Gain (BNG).

Peter Warren
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