

Date 27 August 2020

Dear Sir / Madam

**Response to Test Valley Local Plan: Refined Issues and Options Consultation 2020**

On behalf of my client, the Faberstown Trust, I write in response to the Council's consultation on its Refined Issues and Options to inform the emerging Local Plan.

**Proposed Housing Allocation – Land East of Ludgershall**

My client owns land which lies immediately to the east of Ludgershall, on the edge of the settlement and abutting the administrative boundary between Test Valley and Wiltshire. The residential area of Faberstown lies to the immediate west and there is commercial development along the A342 Andover Road to the south. The site is within walking distance of a wide range of local amenities. It also has an established access via a layby off of the A342 Andover Road. That road then continues directly into the centre of Ludgershall to the west and to Andover to the east via Weyhill. There is also a junction for access to the A303 dual carriageway from the A342, located between Weyhill and Andover. The site has previously been promoted for development through the Council's SHLAA in 2017, 2018 and again through the 2019 review as being suitable for 350 dwellings at 33dph. The site remains available, achievable and deliverable.

Ludgershall has a wide range of facilities which residents of my clients site would have direct access to on foot. This contrasts with services available in a number of the settlements considered to be 'Key Service Centres' in the Council's Settlement Hierarchy Topic Paper (Policy COM2), June 2014. The Council's current consultation on its Refined Issues and Options raises questions over the appropriateness of the Settlement Hierarchy as currently drafted. In determining the suitability of my client's site for allocation, it is appropriate to examine those questions however, before doing so, it is useful to examine the current Settlement Hierarchy Paper (2014) as the foundation for moving forwards.

Pegasus Group

### **Comments on adopted Local Plan Policy COM2: Settlement Hierarchy**

Before addressing how the settlement hierarchy review assessment process should be undertaken during the forthcoming Local Plan review, with reference to the Council's Topic Paper on Settlement Hierarchy (2014) which informed the settlement hierarchy set out in adopted Policy COM2, it should be noted that there are irregularities in the points awarded to individual settlements in the settlement assessment table at Appendix 1 on page 14:

A non-exhaustive list is as follows:

Charlton – has five 'Y's' (yes) but the total is 6;

Chilworth – has three 'Y's' (yes) but the total is 4;

Stockbridge – has eight 'Y's' (yes) but the total is 9.

Having discussed the matter with Officers of the Council, it appears as though historically (i.e. pre 2014 when the current Topic Paper was published) there had been a link between the total number of points awarded in the total column for each settlement and whether the settlement being assessed scored highly in terms of Level of Public Transport (column 1) and / or Job Ratio (column 2). Over time, however, as the assessment criteria were revised and the Settlement Hierarchy Paper evolved, the totalling of the points awarded in the final column has not been corrected. As a result, there is no apparent relationship between how a settlement scored in terms of public transport and / or job ratio and the total. There is a further anomaly whereby page 6 of the paper refers to access to public transport as being scored as 1 (hourly bus route), 2 (buses less frequently) and 3 (access to Cango service) with only settlements scoring a 1 being classed as sustainable. By comparison, the table on page 14 categorises public transport as being H (high), M (medium) or L (low) so there is clearly an inconsistency in the presentation of the assessment criteria. It was also suggested in the Paper that settlements that had a job ratio of over 0.5 were considered to be sustainable. That does not appear to be reflected in the scoring.

Notwithstanding this confusion around the points awarded to settlements, there is a wider issue about whether, on the basis of the erroneous point scoring within the Settlement Hierarchy paper, development has been appropriately allocated across the Borough. For example, Over Wallop currently scores 6 (despite only having 5 'Y's'). Applying the logic that settlements with a high

access to public transport, and a job ratio of greater than 0.5, Over Wallop would score 7. That is higher than both Charlton and Chilworth which are both identified as Key Service Centres in the current Hierarchy. This point is reflected in the table of Rural Villages on page 9 where Over Wallop scores 7. The approach and scoring throughout the Paper is therefore inconsistent and incorrect. As an aside, the table on page 9 (Rural Villages) also includes all of the settlements included in the Key Service Centres table on page 8.

It is clear from the paragraphs above that the Settlement Hierarchy Paper needs a major overhaul and review to address all of the aforementioned anomalies and irregularities.

Turning now to the specific matters raised within the Council's current consultation, this representation responds to one of the questions posed in the consultation document, namely:

*Question 5: How should we decide which settlements to include within each step of the settlement hierarchy?*

### **Development Pattern**

In terms of the pattern of development, as currently drawn, the Settlement Hierarchy is likely to lead to a spatially unsustainable distribution of development over the longer term. Of the six settlements included as Key Service Centres, only Charlton is located in the north of the District whilst Stockbridge is located towards the centre of the District. Following this pattern, over 66% or two thirds of the scale of development to be accommodated in Key Service Centres in Test Valley would be accommodated in the Southern Test Valley Housing Market Area. This development pattern would result in higher levels of infrastructure investment in the southern half of the District and is likely to lead to a comparable lack of investment in the north. It would also contribute towards the disproportionate growth and reliance on Andover to accommodate large and strategic scale housing development in the Northern Housing Market Area given the limited identification of other settlements capable of doing so according to the current Settlement Hierarchy. The settlement hierarchy should therefore, take into account the spatial distribution of future development that it is likely to lead to.

It is also noted that, in settling on the settlement hierarchy set out in adopted Policy COM2, the Council considered the relationship between settlements within the southern part of the borough to settlements beyond but which adjoin its administrative boundary – examples being Nursling

and Rownhams and their relationship to Southampton, and Valley Park and its relationship to Eastleigh and Chandlers Ford. If the same approach is taken in the northern part of the borough, then the allocation of land for housing on the eastern side of Ludgershall within Test Valley should be considered, given the level of services and facilities in Ludgershall, its accessibility by sustainable modes of transport, and the sustainability of a housing allocation in this location. Its allocation would contribute to addressing the national housing shortfall, assist Test Valley in delivering its (likely increased) quantum of the national requirement, and provide cross-boundary investment in Test Valley Borough and Wiltshire Council which can be agreed through the Duty to Cooperate between the two authorities.

### **Assessment Criteria**

As currently drawn the settlement hierarchy includes four steps as follows:

- Major Centres;
- Key Service Centres;
- Rural Villages;
- Other settlements.

The criteria under which settlements should be considered as a Key Service Centre should be reviewed.

The Settlement Hierarchy does not evenly consider the mix of services available in each of the Key Service Centres and the assessment criteria is too simplistic in terms of the points-based approach. It also fails to take into account the environmental constraints which affect the ability of each settlement to accommodate development.

It is important to assess each of the Key Service Centres in turn:

#### **Nursling and Rownhams:**

This settlement has access to a wide range of services and facilities together with good access to public transport and, at the time the Settlement Hierarchy Paper was drafted, a high job ratio. From an environmental perspective however, this settlement is constrained by areas at risk of flooding on the west side, the M27 to the north and a large SINC to the east. There is existing development to the south in Lordshill. There are areas capable of accommodating development beyond the current settlement boundary and those areas of constraint where some development

could be accommodated. Beyond that however, further development would involve the erosion of environmentally sensitive areas or sprawl to the north of the M27 which has been historically avoided.

**Stockbridge:**

Stockbridge has access to a wide range of services and facilities and accordingly scores well on the assessment criteria in Appendix 1 of the current Settlement Hierarchy Paper. However, this is a heavily constrained settlement with the majority of the centre being designated as a Conservation Area with associated Listed Building and setting issues to take into account. In addition, owing to the siting of the majority of the settlement in the valley flood plain of the River Test, much of the settlement is at high risk of flooding. The settlement is also relatively exposed from a landscape perspective. In combination, these factors combine to make it difficult to identify land with strategic scale development potential.

**North Baddesley:**

Overall, the settlement scores well in terms of access to services and facilities, but it scores very poorly in terms of job ratio. Local jobs are essential to creating sustainable patterns of development and restricting future out-commuting. Although the settlement is located relatively close to the M27 as the crow flies, access to the motorway via road is convoluted, requiring travel along the A27 to either junctions 3 or 5 which are both over 3km away (again, as the crow flies so longer via road). Alternatively, commuting via rail would require travel to Romsey train station - however, that is located nearly 3km away, a distance which is regarded as being beyond a sustainable walking distance. There are areas of SINC to the north, east and south of North Baddesley which constrain this settlement in those directions. The settlement is less constrained to the west in this respect, but there are a number of listed buildings and Scheduled Ancient Monuments around the perimeter of the fields beyond the west boundary of the settlement and clearly any future development would need to avoid harm to these heritage assets or their setting. The significant erosion of this space would also close the gap which currently exists between Romsey and North Baddesley.

**Valley Park:**

Valley Park scores well in terms of its access to services and facilities outside the borough, although it has limited a limited access to public transport and poor job ratio which like, North Baddesley, means there is likely to a large amount of out-commuting. Large parts of Valley Park are constrained as a Local Nature Reserve as well as a Site of Importance for Nature Conservation.

There are areas at risk of flooding across its northern boundary. Beyond that the settlement is constrained in terms of its ability to accommodate further development due to the presence of existing development around the perimeters of the Local Nature Reserve.

**Charlton:**

Charlton scores 6 on the selection criteria with no health facilities, no railway station, no school and a poor job ratio. There is a significant area at risk of flooding to the east and south of the settlement which inhibits its ability to accommodate strategic scale development. The settlement is less constrained to the north and west. The land to the north slopes up away from the existing settlement meaning that any new development would be visible in longer distance views from around the settlement. There are also high voltage overhead power lines over this land which would reduce development potential here. The environmental constraints, coupled with the low assessment criteria scoring, raise a question over why this settlement was originally identified as a Key Service Centre (apart from it being an extension to Andover) when, for example, it scores less than Grateley and has a lower job ratio.

**Chilworth:** Chilworth scores just 4 on the selection criteria, scoring a point only on the leisure facility, public house and community facility criteria. It does have the joint highest (with Nursling and Rownhams) job ratio at 1.39 and based on the score of 4, appears to have scored a point for that (but this is not clear, as described above). However, it has a low level of access to public transport, no food store, no other shop, no health facility, no railway station, and no primary or secondary schools. Without access to basic services and facilities, Chilworth cannot be considered as being a sustainable location to accommodate strategic-scale allocations. The settlement is heavily wooded and those areas beyond the current settlement boundary are constrained by the presence of SINC to west, south and east. There is a cluster of heritage assets to the west of the settlement which would limit development on this side of the settlement. The north is less constrained however, like Charlton, there are high voltage overhead power cables running across the land which would restrict development. Similarly to Charlton, it is unclear why this settlement has previously been considered as a Key Service Centre. It does not follow that it is a suitable location for strategic housing growth, just because the University of Southampton Science Park is located there.

From the summary above, it is evident that each of the settlements identified within the existing hierarchy as Key Service Centres have either a limited range of facilities or environmental constraints or a combination of both that limit their potential to accommodate future development

of a strategic scale as the current Policy COM2 suggests. The future assessment needs to be based on a thorough review of the current availability of services and facilities but also take into account the environmental constraints affecting a settlement.

By way of comparison to the settlements assessed above, land around Ludgershall is unconstrained. There are no ecological designations, it is not heavily wooded, it has good transport connections and it is situated in a location that would allow residents to access local services and facilities on foot. There are only small areas at risk of flooding. Heritage assets within Ludgershall are located towards the centre of the northern boundary of the existing settlement so any future development within Test Valley would not affect that area. The settlement has more than two food stores, a range of other shops, a GP surgery, playing fields, childrens playing facilities, two public houses, a social club, a community facility, Ludgershall Castle Primary School and Wellington College Academy. From a public transport perspective, the settlement is served by more than one bus per hour Monday to Saturday and an hourly bus on Sundays. Based on these facilities, the settlement would score 9 against the assessment criteria set out in Appendix 1 on page 14 of the Council's current Settlement Hierarchy Paper.

### **Land East of Ludgershall**

As set out above, my client owns land east of Ludgershall which lies within Test Valley Borough Council's jurisdiction. The 15.8 ha field abuts the eastern edge of Ludgershall at Faberstown and marks where the administrative boundaries of Wiltshire Council and Test Valley Borough Council meet. As this administrative boundary runs along the western edge of the site, the site falls within, but on the edge of Test Valley Borough Council's administrative area. The south-western boundary of the site is bound by Andover Road (A342), providing road access to Andover to the south-east (5 miles), Devizes to the west (18 miles) and Marlborough to the north (13 miles).

The site is situated in a sustainable location with key services close by in Ludgershall. Local facilities include Ludgershall Castle Primary School, St James Church, Ludgershall Sports and Social Club, three convenience stores (including Cooperative Food store and Tesco Express), local restaurants and drinking establishments, a local park with children's play equipment on Deweys Lane and local fire services. There is also a local health centre and doctors' surgery, a post office, additional retail and service facilities and Town Council offices located on the High Street. The nearest convenience store (Nisa) is located at the service station approximately 470m southeast of the site along Andover Road.

Abutting the western boundary of the site are the residential streets of Graspan Road and Pretoria Road in the Faberstown area. There is a small children's play area located just beyond the site's western boundary at the end of Pretoria Road. Existing development extends eastwards along the southern side of Andover Road to the south of the site - including a used car dealership and service station and a petrol filling station with convenience store. My client's site extends no further east than this existing development to the south.

The site is well contained being surrounded by boundaries of trees and hedgerows. A detailed assessment of the constraints and opportunities affecting the site was carried out in 2017 to accompany the SHELAA submission. A copy of that Promotion Statement is attached as **Appendix A**. Following that assessment, an Illustrative Masterplan (**Appendix B**) was prepared to demonstrate how the proposed quantum of development (about 350 dwellings) could be accommodated on the site whilst retaining a sufficient buffer around the perimeter along with providing new formal and informal play areas, additional planting and green links through and around the development.

### **Summary**

As set out above, the Council's previous assessment of the settlement hierarchy, used to inform Policy COM2 in the adopted Local Plan, was flawed. As agreed by Officers, there are inaccuracies and inconsistencies in the current Settlement Hierarchy Paper, such that it requires a thorough review. As currently defined, the Settlement Hierarchy will lead to an unsustainable and imbalanced pattern of development over the longer term, placing an overreliance on settlements in the southern half of the Borough to accommodate major and strategic development (even though, as described above, for varying reasons some of those settlements offer little potential to accommodate strategic scale development), whilst effectively limiting strategic scale development in the northern part of the Borough to Andover. This pattern is also likely to result in a lack of investment in infrastructure in the northern half of Test Valley. The settlements currently considered to be Key Service Centres each need to be carefully reviewed in terms of the availability of their services and facilities, job availability or ease of access to jobs beyond the settlement, and public transport. In addition, the future assessment also needs to take environmental constraints into account.



The Council should work with its neighbours, such as Wiltshire Council, to identify opportunities for sustainable future development in parishes within Test Valley which border settlements in adjoining authority areas. Any such opportunities which also accord with the Council's spatial strategy for its forthcoming Local Plan review should be included in a revised settlement hierarchy, which should be re-named as the "development locations hierarchy" or similar because this would not limit such locations to settlements within Test Valley.

Ludgershall is a sustainable location with a relatively high level of services and facilities. My client's land on the eastern edge of Ludgershall lies under 1.5km from the majority of those services and facilities. It has been demonstrated through the SHELAA/SHLAA submissions in 2017, 2018 and 2019 that the site is available for development, and that the site is relatively unconstrained such that it is deliverable. Ludgershall is a popular location for house-buyers, given that average house prices there are lower than in Andover. An over-reliance has been placed on making repeated allocations of strategic land for housing at Andover in the north of the borough, even though much of that land (at Picket Piece and Picket Twenty) is relatively remote (at over 3km) from Andover town centre, making it relatively unsustainable in transport terms. I therefore respectfully request that the allocation of my client's land is considered as part of a holistic review of potential strategic development locations across the borough.

Encs.

Appendix 1 – Land east of Ludgershall Promotion Statement

Appendix 2 – Illustrative Masterplan

