

25 March 2024

**Delivered by Email**

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



Dear Sir/Madam

**DRAFT LOCAL PLAN (REGULATION 18 – STAGE 2) CONSULTATION (TVBC, 2024)  
REPRESENTATIONS ON BEHALF OF BLOOR HOMES**

Thank you for the invitation to comment on the above consultation. We write on behalf of Bloor Homes, who have an interest in land east of Smannell Road, Andover (Site Ref: 234).

Our client has evolved their proposals for this site in light of commissioned technical assessments, and ongoing engagement with representatives of the Council's planning policy team throughout 2023. The outcome of this process demonstrates the site can be developed without compromising the integrity of the Andover-Enham Alamein-Smannell Local Gap, and as a result, presents an opportunity to deliver a modest level of growth (**c. 200 homes**) in a logical and sustainable location, a short walk from local facilities, and a wider range in Andover via public transport (bus stops within 400 m).

Our client's assessments indicate their proposals are capable of targeting a **c. 56% biodiversity net gain** and a **c.161kg nitrate reduction** versus existing baseline conditions. These outcomes were summarised in an emerging Vision Document for the site and shared with Officers throughout 2023 (see Document A).

We have examined the Draft Local Plan (DLP) and accompanying documents; and highlight specific matters we contend require further investigation and / or modification before the Plan can be considered 'sound', having regard to the tests set out in Paragraph 35 of NPPF. This includes specific concerns with the quantum of growth proposed for the district over the plan period, in Northern Test Valley, and at Andover in particular.

In addition, we highlight significant flaws in the site assessment process that informed the proposed site packages for Northern Test Valley. It is evident this process was based on incomplete or out of date information, and has not accounted for the evidence our client shared with the Council throughout 2023. The outcomes derived from it are therefore flawed as a consequence. This is particularly evident at Appendix IV of the Sustainability Appraisal (SA) which accompanies the Local Plan. It is apparent from the site assessment summary (page 179+ of SA Appendix IV) that the Council's assessment of our client's site is incorrectly informed and needs updating.

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Our client considers there is a compelling case for further land to be allocated to meet evidenced housing needs at Andover, and sets out the particular case for and benefits of allocating land East of Smannell Road, Andover. Our client considers this to be a logical and sustainable opportunity for growth, and of a scale capable of being delivered within the first five years of the plan period. Our client would welcome the opportunity to discuss this opportunity further in the context of the emerging Local Plan, and in advance of the Regulation 19 Local Plan consultation stage.

In the interim, we provide the following comments and suggested modifications to assist the Council's progression of the Local Plan:

Policy/Paragraph	Comment
SS1: Settlement Hierarchy	Our client supports the inclusion of Andover as the top tier settlement in the hierarchy, as deduced through the Council's 'Settlement Hierarchy Assessment' (TVBC, Feb 2022). As outlined in paragraph 3.33 of the DLP, this settlement's role and function extends beyond just the needs of the borough, which has rightly in our view been accounted for in this classification.
Paragraph 3.62	Given there are acknowledged unmet needs in adjoining LPAs, it would be prudent in our view for the SA to test higher growth options as 'reasonable alternatives'. This will enable the Council to effectively respond to such requests prior to finalising and submitting its Local Plan over the next 12+ months. At the very least, it will demonstrate continued ongoing cooperation with adjoining authorities over such matters, in accordance with s. 33A of the PCPA (2004).
SS3: Housing Requirement	<p><u>Housing Need</u></p> <p>PPG [Paragraph: 010 Reference ID: 2a-010-20201216 (NPPG, 2020)] confirms that:</p> <p><i>'The standard method for assessing local housing need provides a <u>minimum starting point</u> in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or <u>other factors might have on demographic behaviour</u>. Therefore, <u>there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.</u> (our emphasis).</i></p> <p>Paragraph: 024 Reference ID: 2a-024-20190220 of the PPG goes on to say:</p> <p><i>'An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.'</i></p>



Paragraph 18 of the Council's SHMA (*tg Consulting, Jan 2022*) suggests there, *'are no circumstances in Test Valley relating to growth funding, strategic infrastructure improvements or affordable housing need which indicate that 'actual' housing need is higher than the standard method indicates.'*

This is reiterated at paragraphs 3.58 and 3.59 of the DLP, with a notable exclusion of reference to affordable housing need:

*' 3.58 The SHMA has also assessed whether there are any exceptional circumstances that exist to justify increasing or decreasing the local housing need assessment as our housing requirement. Justifiable reasons are based on growth funding, strategic infrastructure improvements or addressing unmet housing needs from surrounding areas, as set out in national policy.*

*3.59 The SHMA concluded there is no growth funding or strategic infrastructure improvements that would justify increasing our housing needs. Whilst preparing the Regulation 18 Stage 1 consultation document there was also no clear evidence of the level of unmet housing need in neighbouring local authority areas that would also justify increasing our housing needs.*

We do not agree. Turning firstly to affordable housing. Over the preceding 10-year period (2012-2022), the median workplace-based affordability ratios for the borough have grown from 8.49 to 10.68, indicating worsening affordability. At paragraph 5.66 of the SHMA (Jan 2022), the consultant confirms that *'The analysis for Test Valley estimates an annual need for **437** rented affordable homes, which is notionally 81% of the minimum Local Housing Need of 541 dwellings per annum. (our emphasis).*

At paragraph 5.96 of the SHMA (Jan 2022), the author confirms an estimated additional net need for affordable home ownership, *'for around **215** dwellings per annum, with a need being shown in all areas.'* The author goes on to state:

*'...it does seem that there are many households in Test Valley who are being excluded from the owner-occupied sector. This can be seen by analysis of tenure change, which saw the number of households living in private rented accommodation increasing by 56% from 2001 to 2011 (with the likelihood that there have been further increases since). Over the same period, the number of owners with a mortgage dropped by 14%.' (our emphasis).*

Concluding on the issue the author confirms at paragraph 37 of the SHMA (Jan 2022), 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.'*

It is wholly apparent from the SHMA that there is an acute need for affordable housing, one that is unlikely to be viably met from the minimum LHN figure of 550pa alone. Indeed, far from it using the thresholds set out in Policy HOU1 of the DLP.

Paragraphs 3.15-3.17 of the Council's *Housing Topic Paper* (TVBC, Feb 2024) indeed acknowledges the LHN figure would need to be uplifted to 1222dpa to address the absolute need for affordable housing. The Council, with reference to the SHMA, indicates there is a lack of demand for this level of market housing. Rather than assess 'reasonable alternatives' to this, as a means to meet some, rather than all of such needs; the Council conclude the 1222dpa is an unreasonable alternative and use this to justify not exploring any uplift whatsoever.

This is unjustified in our opinion, and in doing so the Council have precluded meaningful comparisons being made between other 'reasonable alternatives' that could assist meeting some of this shortfall. We acknowledge there will be a tipping point before such uplifts become 'unreasonable', based on market demand, viability and other evidence. However, to assert there are no reasonable alternatives to meet some of these needs, is unreasonable. Nor does the approach accord with SEA/SA guidance set out in Paragraph: 018 Reference ID: 11-018-201403306 of the Planning Practice Guidance (PPG).

Given affordable housing needs are not likely to be met, and there is strong evidence of worsening affordability over the last 10 years, there are compelling grounds to suggest an upward adjustment to the LHN figure is needed. It would certainly be prudent for the Council to at least test a reasonable alternative higher than 550pa, through their SA process. The absence of which we would suggest is a significant omission from the SA, which is both unjustified and contrary to NPPF and PPG. Both of which seek to ensure the devised plan strategy is appropriate, considering the reasonable alternatives.

We contend there is sufficient evidence to justify a need to consider reasonable alternatives to failing to meet needs, which would otherwise be contrary to NPPF paragraph 35; and recommend these alternatives are explored through the next iteration of the SA process.

Turning next to the assertion at paragraph 3.62 of the DLP, that *'individual Local Plans need to progress with evidencing the level of unmet housing need they may have. As this has not been produced yet by the relevant neighbouring authorities, we are unable to consider this at this time.*

This is factually incorrect in our view, as documented through the examination of the New Forest National Park Local Plan, which also adjoins the borough. Paragraph 14 of the Inspectors Report (July 2019) confirmed an unmet need of 460 homes existed; and that Test Valley Borough Council had confirmed through a Statement of Common Ground that it was unable to assist. This in part related to the stage of their Local Plan production at that time. This has clearly changed, and TVBC are at a stage of plan production where this can and should be taken into account through the SA as 'reasonable alternative' growth option.

There are also, as acknowledged in the DLP, known unmet needs from other adjoining LPAs in the area. Whilst it is true to assert the final quantum of unmet need is in a state of flux owing to plan production stages, it is beyond reasonable doubt there will be unmet needs.

To ensure the plan is 'positively prepared', we would suggest the Council ought to be testing reasonable alternatives other than the minimum LHN figure through the SA. We would suggest that the assertions in the DLP in such regards are revised accordingly.

The statutory Duty to Cooperate under Section 33A of the 2004 Act requires TVBC to demonstrate they have engaged with adjoining authorities constructively, actively and on an on-going basis, throughout the preparation of the DLP. This understandably does not start with a request for formal assistance with unmet needs from an adjoining LPA. Nor does the absence of such a request absolve an authority of this legal duty. If such requests arrive late in the plan production process, and the Council have not tested reasonable alternatives to meet additional growth beyond the minimum LHN figure, the Council have very little evidence to determine whether they can or cannot assist.

This would potentially delay plan production whilst further reactionary assessments are undertaken. Taken together, and in the spirit of producing 'positively prepared' plans, we contend there are affordability and unmet housing need grounds to suggest an uplift to the minimum LHN figure should be tested as reasonable alternatives through the SA process, and in accordance with the SEA regulations.

## Housing Market Areas (HMAs)

Turning to the boundaries and extent of the HMAs across Test Valley. The current adopted Local Plan uses two Housing Market Areas (HMAs) to inform the spatial distribution of growth through Policy COM1. These are Southern Test Valley (STV) and Northern Test Valley (NTV). The HMA splits across Test Valley have formed a key part of the joint spatial strategies agreed with adjoining authorities for many years. The origins of which are rooted in the drafting of the former South East Plan (GoSE, 2009) sub-regional strategy for South Hampshire. The south Hampshire authorities came together to collaborate on this sub-regional strategy and formed the Partnership for Urban South Hampshire (PUSH) in 2003. Whilst this regional tier was abandoned in 2010, the PUSH authorities (renamed PFSH in 2019) saw merit in continuing to collaborate jointly on strategic matters, as part of LPAs legal Duty to Cooperate.

The PFSH authorities have consistently concluded and re-validated the HMAs, confirming those bisecting Test Valley are not self-contained within the borough, they extend beyond it into adjoining authorities. Consequently, there has remained a sound logic in joint working to agree on HMA boundaries, particularly when working together to agree an appropriate spatial distribution of growth and unmet needs between these authorities.

The PFSH authorities have consistently worked together to agree the HMA boundaries, including those applicable to the southern parts of Test Valley, and have not signalled any intention to revisit these in their latest Statement of Common Ground<sup>1</sup>, nor the Spatial Position Statement that flowed from this in December 2023. Indeed, at paragraph 3.6 of the SoCG (PFSH, Sept 2023), it is confirmed:

*‘There is common agreement amongst partner authorities that the PFSH area is an appropriate geography on which to prepare a Spatial Position Statement to address cross-boundary strategic planning matters and support the production of local plans. An extensive evidence base has identified the housing market areas and the need to plan at the South Hampshire scale has previously been considered. Significant information is included within the 2014 GL Hearn Strategic Housing Market Assessment and previous evidence base work related to the physical environment has demonstrated the synergies for collaborative planning in South Hampshire. It is not intended to revisit the definition of the subregion as part of the work identified in this SoCG.’* (our emphasis).

<sup>1</sup> Statement of Common Ground (PFSH, Sept 2023)

We therefore noted with interest the work undertaken by the Council to re-define the HMAs for NTV and STV<sup>2</sup>, relocating the boundary to geographically align with parish boundaries more centrally across the borough. Given the HMA boundaries are strategic in nature and are an established part of joint working between the PFSH authorities, we are surprised this approach has been taken unilaterally. We also suggest parish boundaries are not an appropriate basis on which to align such market areas, which are influenced by various social and economic factors, as opposed to where a parish boundary lay.

We therefore suggest there are benefits to revisiting the HMA boundary change, with a view to reverting to that currently adopted and consistent with that agreed by PFSH. Adopting two differing approaches is not in our view conducive to facilitating constructive and effective strategic planning. A point we sense the Councils own consultant recognised at paragraph 7.15 of the Housing Market Areas Study (jgC, 2021), in stating:

*'Recognising that HMA boundaries will have an element of overlap and are to a degree a matter of judgement, it is not unreasonable for the Southampton HMA boundary, as defined in the PFSH work, to be retained for strategic plan making while the definition of the Romsey and South East HMA herein is used for local planning purposes only.'* (Our emphasis).

We would recommend any decision to amend the HMA boundaries would be better informed through joint working with adjoining LPAs, including those comprising PFSH.

*As outlined in paragraph 24 of NPPF (2023), 'Local planning authorities and county councils (in 2-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.'*

The definition of a HMA, and its influence on the spatial distribution of growth between the PFSH authorities is a clear example in our view of a 'strategic matter' that needs cooperation over. This is a matter that is rightly covered by a statement of common ground between such authorities. Unless and until this SoCG is updated to support an alternative boundary, the current adopted boundary should be retained in our view.

<sup>2</sup> Housing Market Areas Study (jg Consulting, Jan 2022)



Accordingly, we respectfully recommend any updates to HMAs are pursued through joint working with the relevant adjoining authorities, not unilaterally. If the Council choose not to pursue this course of action, we suggest as a minimum, that the SA accompanying the plan tests the existing HMA boundaries as a reasonable alternative. There is no justification in our view for omitting this reasonable alternative, as is evidently the case in the current SA (2024).

### Split Housing Requirement

As outlined above, the revised HMA boundary runs at odds with the strategic approach taken by the PfSH, and the current adopted Local Plan. We have outlined our views on this, and suggest this is revisited with neighbouring LPAs, and tested through the SA process accordingly.

In addition, we note at paragraph 4.8-4.9 of the Councils Housing Topic Paper (TVBC, Feb 2022), that there are no reasonable alternatives to the HMA split proposed:

*This represents a robust approach and there are no reasonable alternative options to consider through SA.'....*

*'The Plan proposes to split the housing requirement according to the amount of population within each HMA.'*

We would suggest there are indeed reasonable alternatives that ought to have been tested, and consequently, we are not able to support this as *'an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence (Paragraph 35, NPPF, 2023).*

Whilst demographic considerations are a key part of determining an appropriate split, they are not the only one. Indeed, there are many considerations key to determining this split, which may stem from the vision and objectives of DLP for the plan period. This requires analysis, consultation and testing through the SA process, to arrive at an appropriate split. This was recognised and explored as part of the current adopted local plan. At paragraph 5.25 of the adopted local plan, a 67:33 split was proposed between NTV and STC based on job forecast data; and the Council's aspirations for Andover to maintain a degree of self-containment in the labour market, and assist in sustaining its leisure and retail offer. This recognised the role and function of Andover, not only across the borough, but in the wider area.

A housing split of 57%:43% deduced purely on *'the amount of population in each HMA'*, is not in our view likely to comprise the *'reasonable alternative'*. Indeed, as the Council's consultant states at paragraph 7.10 of the *'Housing*

	<p><i>Market Areas Study'</i> (jg Consulting, Jan 2022):</p> <p><i>'Ultimately, it will be for the Council to decide on the distribution of growth within the borough boundaries taking into account wider considerations such as sustainability, capacity and environmental constraints.'</i></p> <p>We suggest this does not just apply to the distribution of sites, but to the spatial strategy implication of the housing requirement split adopted at the outset.</p> <p>As a result, we would suggest that the reasonable alternatives to both the HMA boundaries and housing split be revisited and tested through the SA prior to the next iteration of the DLP. Given the role and function of Andover, it seems likely a case for greater emphasis on NTV remains, particularly in attracting and retaining a skilled workforce to underpin the economic growth aspirations for this area.</p> <p>We therefore reserve judgement on the final split until further analysis is completed by the Council on factors (beyond just existing population), and reasonable alternatives have been tested in light through the next iteration of the SA.</p>
<p>SS6: Meeting the Housing Requirement</p>	<p>As set out in our comments to Policy SS1, we contend there is more than sufficient justification to explore and test a higher housing requirement across the district, and particularly in NTV.</p> <p>Taking the above as the starting point, we contend there will be a consequential need to allocate additional sites to help meet evidenced needs within the plan period. We contend there are suitable opportunities to allocate additional sites around the largest tier settlement of Andover, where the opportunity to promote sustainable patterns of development is greatest (Paragraph 11a NPPF).</p> <p>Our client's site east of Smannell Road, Andover is suggested as a suitable opportunity for release in this context (See Document A). At around 200 homes, it is readily deliverable in the first five years of the plan period. This will assist in meeting more of the acute unmet need for affordable housing in NTV, particularly in the first five years of the plan period. This is particularly important given the reliance the DLP places on larger more complex site allocations in NTV.</p> <p>As set out below, those directed to Ludgershall in particular seem likely to take longer to be delivered than indicated in the Councils Housing Trajectory (TVBC, Jan 2024), and may not be completed within the plan period as a result. Additional smaller allocations capable of addressing acute</p>

	<p>affordable housing needs earlier in the plan period are therefore likely to be needed to ensure this policy is effective.</p> <p>Policy SS6 sets out the proposed strategic allocations in NTV, 1500 units of which are directed to Ludgershall (Draft Policies NA7 &amp; NA8). 1150 (Policy NA8) of these comprise a large-scale extension to a proposed strategic site allocation in the yet to be submitted Regulation 19 version of the Wiltshire Local Plan (1,220 homes - Draft Policy 40). A single comprehensive masterplan, phasing and delivery strategy is required for the latter, which must be prepared and approved by the local planning authority in advance of any planning application being submitted for the whole or part of the allocated site.</p> <p>The draft Policy NA8 site relies on a significant road bridge over the rail line for vehicular access. It is unclear from Paragraph 4.103 of the TVBC Regulation 18 (Stage 2) Local Plan whether the necessary legal agreements are in place already to assure the delivery of this bridge, and the technical feasibility and viability implications of this known for site delivery trajectories.</p> <p>The scale and complexity of co-ordinating all three of the proposed allocations at Ludgershall, which include cross boundary infrastructure co-ordination, and lack of certainty over timescales for the delivery of a key rail bridge, suggests the housing delivery trajectory for these sites may be overly optimistic. Wiltshire and TVBC Local Plans are currently anticipated to be adopted in 2025/26 respectively. The Council assume 50 units are completed on the larger NA8 site in 2031/32.</p> <p>However, research undertaken by Lichfields in 2020 (updated in March 2024<sup>3</sup>), and regularly referenced by LPAs across the South East in recent years, suggests on average the lead in time for sites of 1000- 1499 homes could extend to over 6 years from validation of the initial outline application to the completion of the first dwelling. This is also after site assessment, pre-application engagement, EIA and application drafting stages, which in themselves are likely to extend to around 12 months or sometimes more for sites of this complexity and scale.</p> <p>In this instance there is also a stated need at paragraph 4.98 of the DLP to integrate proposals with that being brought forward to the west in the emerging Wiltshire Local Plan. This will require co-ordination with and input into the comprehensive masterplan and subsequent planning</p>
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<sup>3</sup> [start-to-finish-3\\_how-quickly-do-large-scale-housing-sites-deliver.pdf \(lichfields.uk\)](#) – Figure 3.1 (Page 8).

	<p>applications for such lands. There is also we suggest further work needed to understand the absorption rate implications of building out all three sites into the same local market at similar times. It is unclear whether such evidence has been commissioned and factored into TVBC's housing trajectories for these sites.</p> <p>The above would suggest that substantive pre-application works for such sites would likely need to be progressed at risk in advance of adoption of both the Wiltshire and TVBC Local Plans to achieve the trajectory set out by TVBC. Unless this is evidenced, we would suggest the trajectory is revisited. If, as we assert, this results in completions from such sites extending beyond the plan period, then additional sites should be allocated to address any shortfalls identified in supply within the plan period as a consequence.</p> <p>Our client's site is suggested for consideration in this context (see Document A).</p>
<p>Paragraphs 4.6-4.7 : Housing Site Assessment</p>	<p><u>Spatial Distribution of Sites (NTV)</u></p> <p>In addition to the trajectory based assertions we make in respect of Policy SS6, we also have concerns with the site assessment process that led to a preferred pool of sites for NTV, and specifically the level of growth directed to the lower tier settlement of Ludgershall; versus more sustainable and reasonable alternatives around Andover.</p> <p>A strategic scale extension to Ludgershall will inevitably have cumulative impact implications to account for over and above that proposed in Policy 40 of the Wiltshire Local Plan at present. Ludgershall is a relatively modest settlement with limited facilities, and relies heavily on adjacent settlements, particularly Andover for key services and facilities.</p> <p>The absence of a rail station at Ludgershall, and consequent greater reliance on road-based trips to Andover leaves us to question whether the current strategy is an appropriate one versus the reasonable alternatives. We are concerned this will not contribute to fostering more sustainable patterns of development (Paragraph 11a NPPF), versus the reasonable alternative options, including for example at Andover. Particularly given the availability of reasonable alternative options for growth at Andover.</p> <p>A significant quantum of growth has been directed to Ludgershall through adopted Wiltshire Local Plans to date, which is still bedding in, and now a further 1,220 home mixed use allocation is proposed under draft Policy 40 of the emerging Wiltshire Local Plan. This is a significant level of growth, change and disruption in a relatively short time</p>

frame, at a relatively modest scale settlement. We contend that adding a further 1,500 units, as an extension to the Policy 40 site (2,720 homes and other mixed uses cumulatively), is disproportionate to the settlement, and is not the most appropriate strategy versus the reasonable alternatives.

Whilst the goal we can discern from this is to make Ludgershall more self-contained, it will take many years for such sites to be built out and provide the infrastructure, services and facilities needed to enhance the sustainability credentials of this settlement. Even then, Andover is likely to remain a key draw for commuters, and the absence of a rail link between the two is likely to result in a greater reliance on an increased level of car borne journeys, contrary to guidance in NPPF, and working against draft Policy CL1 of the DLP (Countering Climate Change).

We accordingly question the logic of directing yet further strategic growth to this settlement (over and above that already committed and emerging through the Wiltshire Local Plan), at the expense of more sustainable options around other settlements, including the top tier settlement of Andover.

We cannot therefore conclude the current spatial distribution strategy is an appropriate strategy, when considering the reasonable alternatives. This includes the availability of reasonable alternatives around Andover, including as we assert below, our clients site east of Smannell Road.

#### Flaws in Site Assessment Process

As set out below, we raise specific flaws in the assessment process that led to preferred pool of sites for NTV set out in Figure 5 of the SA. It is evident this process was based on incomplete or out of date information, and does not account for the evidence our client shared with the Council throughout 2023.

The outcomes derived from it are therefore flawed as a consequence. This is particularly evident at Appendix IV of the Sustainability Appraisal (SA) which accompanies the Local Plan. It is apparent from the site assessment summary (page 179-190 of SA Appendix IV) that the Council's assessment of our client's site is incorrectly informed and needs updating.

Examples include:

- *Officer Assessed Housing Capacity:* The assessment assumes 350 homes, when in fact this is around **200**



	<p><b>units.</b> This was confirmed following further site assessment work and engagement with Officers early in 2023 (see Document A).</p> <ul style="list-style-type: none"> <li>• <i>Objective 1:</i> The assessment indicated no information has been proved to the LPA to conclude whether the proposals would meet particular needs, and is scored (?) as a result. This is not the case, as confirmed and shared with Officers in 2023 (see Document A). This should accordingly be scored positive.</li> <li>• <i>Objective 2D:</i> Assessment asserts the site is not within 400m of bus stops and hence negatively scored. <u>This is factually incorrect.</u> <b>The site is just over 300m from a bus stop at Pasture Walk (Smannell Road).</b> To be consistent with others, the site should be scored positively. Indeed, the Ludgershall strategic site (page 159 SA Appendix IV) is considerably further from Andover than our clients site, and is scored positive. On this basis given the additional journey times for Ludgershall, our clients site should score higher than the Policy NA7-8 sites, with regard to this specific sub-objective.</li> <li>• <i>Objective 3(H&amp;I):</i> As stated above, the assessment wrongly asserts the site is beyond 400m of bus stops, and assumes the promoter has not explored options for access, with potential access constraints asserted as a result. <u>Neither are correct,</u> as shared with Officers in 2023 (See Document A). In addition, reference is made to the need to consider cumulative impacts of other potential housing sites to the south, yet these are not proposed for allocation. The assessment should assess such sites alone and in combination should there be potential for wider allocations in this area.</li> <li>• <i>Objective 4C:</i> The assessment wrongly assumes sterilisation of mineral resource, when in fact the submitted masterplan confirms this will be left undeveloped. Much in the same way as developments constructed to the south west of our client’s site. This should not be a mixed or negative score as a consequence.</li> <li>• <i>Objective 8A-C:</i> The assessment <u>wrongly assumes a development of 350 homes,</u> and has <u>not referenced the submitted masterplan</u> (See Document A). The latter provides justification for and benefits of this sites release, and evidence to demonstrate the development proposed would not harm the integrity of the Andover – Enham Alamein – Smannell Local Gap. Nor would it</li> </ul>
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substantially harm the setting to the listed building and AoNB further to the east of the site.

Paragraph 3.1.10 of the Council’s ‘Local Gaps Assessment’ (RSK, 2023) confirms the detail underpinning the designation of existing gaps, which includes reference to the PFSH policy framework criteria for identification and designation of such gaps. This includes confirmation that:

*‘In defining the extent of a gap, no more land than is necessary to prevent the coalescence of settlements should be included having regard to maintaining their physical and visual separation.’* (our emphasis).

As set out in Document A, we contend there is more land included that is needed to fulfil this purpose. The release of the land proposed for development would not therefore compromise the integrity of the ‘Andover – Enham Alamein – Smannell’ Local Gap, and would provide new landscape planting and biodiversity enhancements alongside.

Importantly, at Paragraph 1.1.38 of the Council’s ‘Landscape Sensitivity Study (RSK, 2023), it is stated:

*‘The lower lying land immediately west of the PRoW and associated visually with East Anton MDA is less constrained.....*

*The lower lying land associated with the PRoW bisecting Finkley Road near the East Anton MDA has a much stronger and more obvious relationship with the existing pattern of development...*

*Any development should use a reduced density to the development edge to create a positive landscape edge and interface between urban and rural areas. This should be allied to areas of semi-natural greenspace provision and native screening buffers as part of a landscape led design approach.’* (our emphasis).

This has been accounted for in our client’s proposals for the site (See Document A). As a consequence, the SA assessment of this site proposal, including the concluding summary, should be updated, with revised scores reflecting this accordingly.

- *Objective 9A-B:* As set out in engagement with Officers and in Document A, the proposals are designed to ensure the setting to heritage assets are respected and where needed enhanced. The assessment process should take

	<p>account of the submitted masterplan proposals, with scores updated to reflect this accordingly.</p> <ul style="list-style-type: none"> <li>• <i>Objective 10A-D</i>: Mixed scores are presented on the basis that ‘no indicative masterplanning has been undertaken for this site’. <u>This is factually incorrect</u>, and was shared in engagement with Officers over a number of months as it evolved in 2023. The outcome is a development that respects and enhances, and achieves a substantial BNG of 56%, and 161Kg nitrate reduction. The scores indicated should be updated to account for the significantly more positive effects of the proposed development (see Document A).</li> <li>• <i>Objective 12C</i>: Again, reference to lack of masterplanning is <u>factually incorrect</u> and requires updating. The proposals retain the PRow and provide a number of additional connections to existing and proposed public open spaces (see Document A).</li> </ul> <p>In light of the foregoing, we respectfully suggest our client’s site qualifies as one that ought to be in the ‘Preferred Pool of Housing Sites’ summarised at Fig5 of the SA.</p> <p>We have outlined elsewhere in our comments the grounds for reviewing this revised pool, with a view to drawing down additional sites to help meet unmet needs in locations that promote sustainable patterns of growth (Para. 11a, NPPF).</p> <p>In this regard, we commend our client’s site (SHELAA Ref. 234) for consideration in this context. An outline of the proposals and masterplan for this is enclosed at Document A.</p>
<p>Policy NA8: Land to the South East of Ludgershall</p>	<p>For brevity and avoidance of duplication, see site specific comments under Policy SS6 and Paragraphs 4.6-4.7 : Housing Site Assessment above (insofar as they pertain to the draft Policy NA8 site).</p>
<p>Policy ENV4: Local Gaps</p>	<p>See comments on <i>Objective 8A-C</i> of the site assessment process for SHELAA Site 234, under Paragraphs 4.6-4.7 : Housing Site Assessment above. We respectfully recommend in light of such comments that the ‘Enham Alamein/Smannell Local Gap’ be amended to remove lands our client has shown to be greater than needed to fulfil its purpose (see Document A).</p>

We trust the enclosed prove useful in evolving the Local Plan to the next stage of production. We would welcome the opportunity to meet with Officers to elaborate on any matter raised in these representations.

Yours faithfully



Ryan Johnson  
Senior Director



Enc. Document A – Vision Document - Land East of Smannell Road, Andover (EDP, 2023).



# FINKLEY NORTH

A Sustainable Vision



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Report Ref: edp7350_r001				
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Delivering a new low-carbon development that offers:

- **c.20.35ha** of Green Infrastructure
- **c.56%** biodiversity net gain
- **c.161Kg** nitrate reduction
- **c.200** new homes (inc. Affordable Homes)



**BLOOR HOMES**

Site Promoter

**Turley**

Planners

**edp**

Masterplanning, Ecology,  
Heritage and Landscape

**motion**

Transport and Drainage Engineers

# 01 - A Sustainable Location

**This Vision Document has been prepared on behalf of Bloor Homes to promote Land East of Smannell Road, Andover, for a low-carbon residential development of around 200 new homes, associated infrastructure and extensive green space provision. This document demonstrates the opportunity to plan for long term sustainable growth at north-east Andover, balancing the needs of providing high quality homes with the protection and enhancement of the environment.**







## About Bloor Homes

Bloor was founded in 1962 by John Bloor. We have 60 years continuous experience in promoting and developing major housing schemes across the UK.

Bloor Holdings Limited, through a combination of Bloor Homes, Triumph Motorcycles and Pickering Plant has a combined turnover of £2bn per annum and remains a financially independent and family owned business with no debt.

The long term family ownership and simple management structure provides certainty which is not susceptible to change, disruption or pressure from the city.

The business operates across the Country from 9 regional offices, with a head office based in Measham.

The company builds over 4500 new homes annually and we have consistently maintained our HBF rating as a 5 Star Home Builder.



# The Planning Case

## Site Location

The site abuts the eastern edge of East Anton, a suburb of Andover within the administrative area of the Test Valley Borough Council (TVBC).

The provision of housing in such an accessible location has many benefits. It contributes to more sustainable patterns of growth, reduces the need to travel and assists the Council to deliver on some of their climate change pledges. The provision of further housing, particularly affordable housing, at this Tier 1 settlement, also assists the Council in retaining and attracting the economically active workforce needed to deliver the social and economic objectives of the emerging Local Plan.

## The Local Plan

The current Local Plan for the area was adopted in 2016 and covers the period to 2029. TVBC conducted an internal review of this Local Plan in 2021, extending its lifespan for a further five years whilst a full formal review of this plan is undertaken for the period to 2040.

The review local plan has progressed to Regulation 18 stage, with a consultation document published in February 2022. The Council confirmed that the market towns of Andover and Romsey will continue to play a significant role in the Council's spatial strategy. These comprise the largest settlements in the Borough, with the widest range and number of facilities. They are consequently ranked as Tier 1 settlements in the settlement hierarchy under draft Spatial Strategy Policy SSP1.

## Addressing Local Housing Need

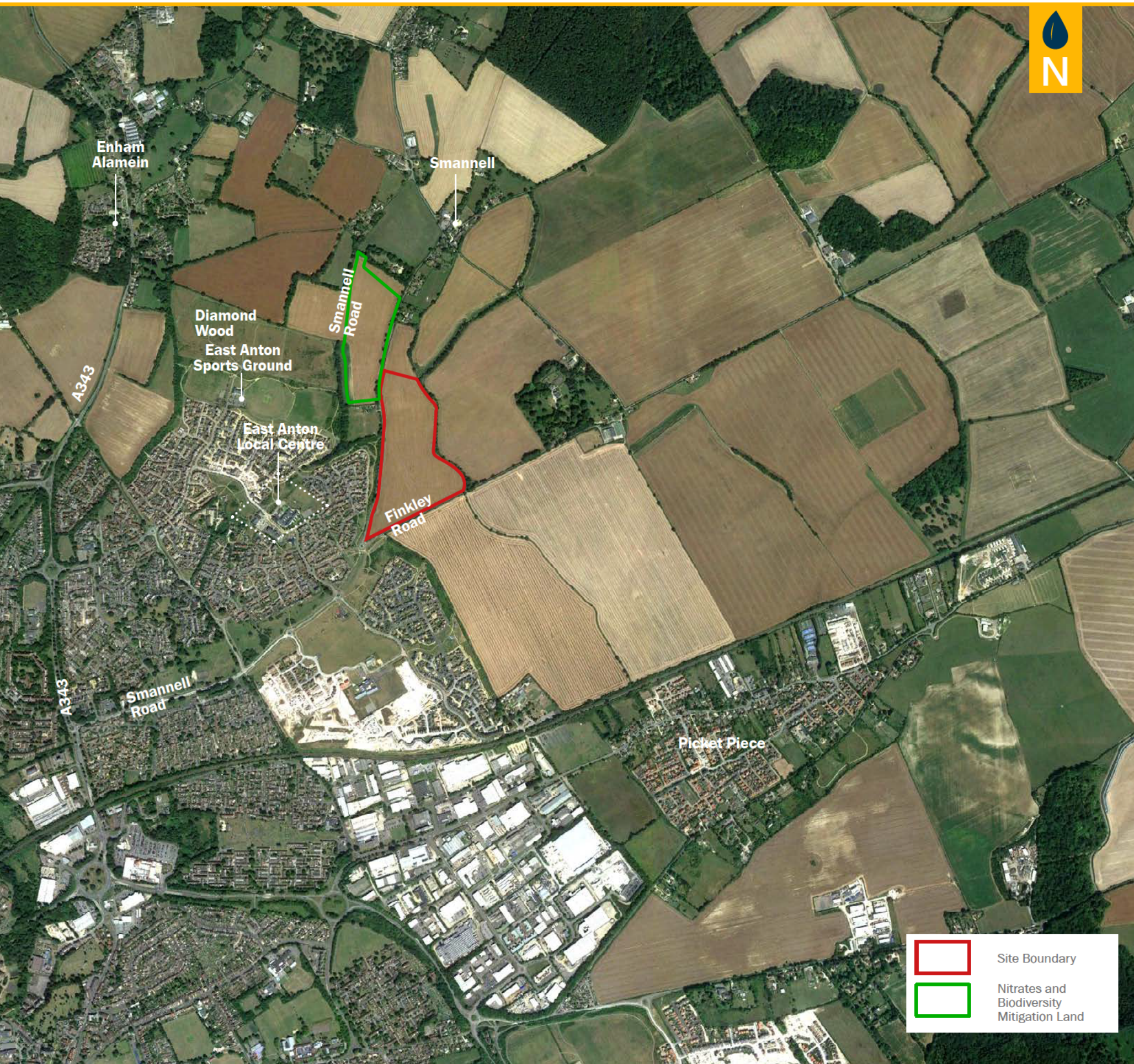
The Council have confirmed they intend to meet at least the minimum housing need of 541 homes per annum over the plan period to 2040 (10,820 homes), with the greatest proportion of growth (at least 6,200 homes) potentially distributed to Andover under draft Strategic Policy 6. The final housing requirement and the amount of growth to be directed to this settlement is still to be determined. This will be derived from further assessments, including those examining of the role and function this settlement plays in the wider housing market area it sits within; and agreement over the contribution this Plan should make to addressing the known unmet housing need of adjoining Local Planning Authority's (LPA).

Consequently, the next consultation stage of the Local Plan has been pushed back to the autumn of 2023. In the interim, Bloor Homes will progress and share their analysis of this site's potential with the Council. Early indications suggest this site constitutes a logical and suitable opportunity for growth around this key settlement, with no known overriding constraints to its delivery in the first five years of the plan period. The site is well located to access a range of local services and facilities by non-car means, in addition to the full range of social and economic opportunities associated with this districts largest and most sustainable settlement. Furthermore the site, in conjunction with the Nitrates and Biodiversity Mitigation Land, is able to provide around 20.35ha of open space, and targets a c.161kg nitrate reduction and a c.56% biodiversity net gain.



Figure 1. Wider Context Plan





Enham Alamein



Smannell

Diamond Wood  
East Anton Sports Ground

East Anton Local Centre

Finkley Road

Picket Piece

-  Site Boundary
-  Nitrates and Biodiversity Mitigation Land



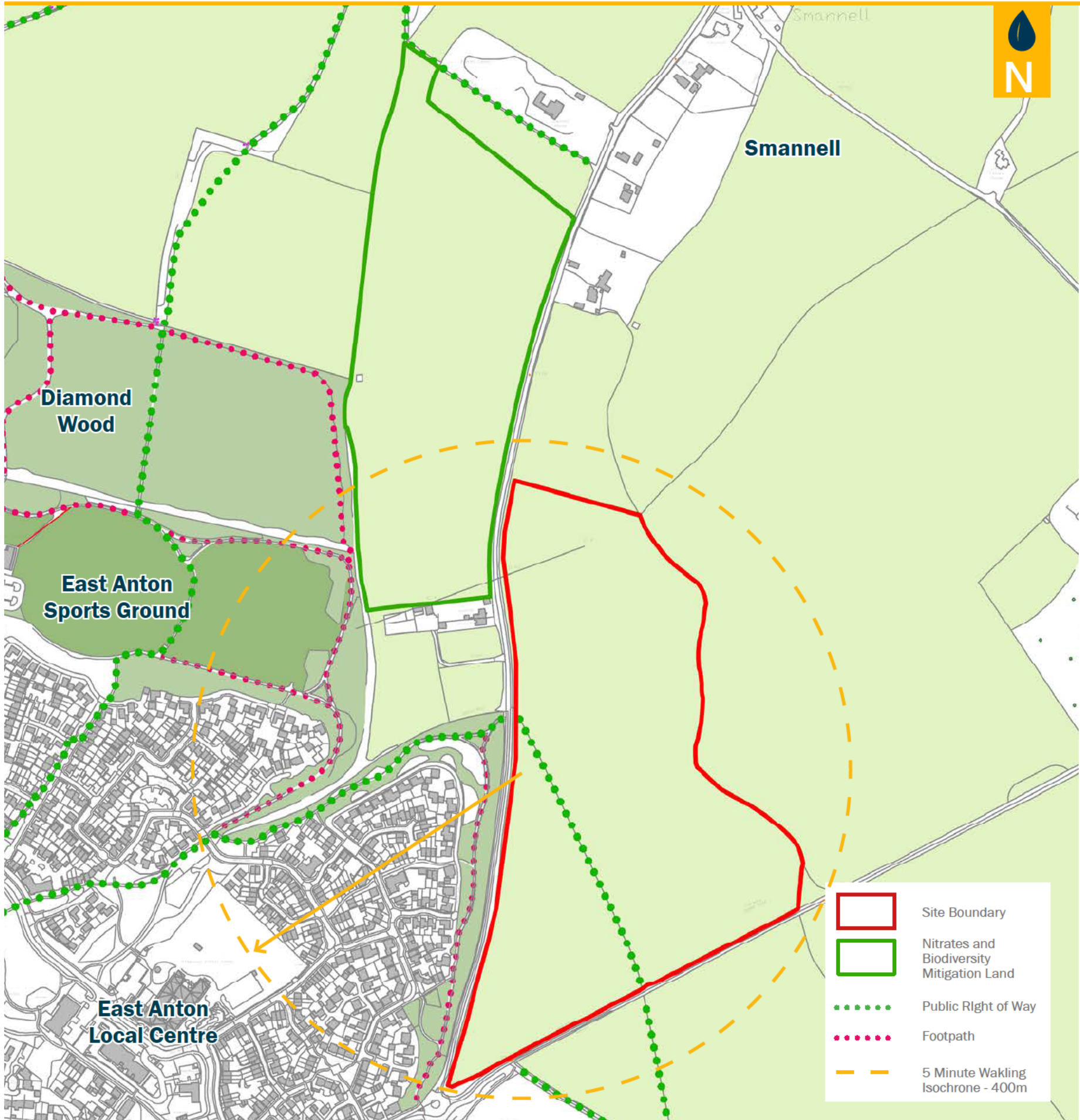


Figure 2. Site Boundary and Local Connections



## The Site

**Typical of local farmland character, the site comprises two medium sized arable fields bounded by mature hedgerows and hedgerow trees.**

The two parts of the site lie on either side of Smannell Road, a minor road connecting the village of Smannell and East Anton on the north-east side of the town. The site is also bounded by:

- To the south by Finkley Road a minor road following the historic alignment of the Portway roman road;
- To the west by East Anton, a recent urban extension to Andover providing local amenities within walking distance; and
- To the north and east by open countryside.

### Walking and Cycling

The Development is adjacent to the recently completed East Anton community, on the western side of Smannell Road. Within East Anton there is a network of pedestrian and cycle routes that will encourage future residents to make use of active travel routes, including:

- A shared cycle footway running north to south along the western side of Smannell Road, providing a connection to the East Anton centre offers facilities such as restaurants, shops, schools and a community centre; and
- A shared cycle footway running east to west to the north of East Anton, leading to East Anton Sports Ground and leisure walking routes.

There is an existing Public Right of Way (PRoW) 005/7713/1 running north to south through the site.

### Public Transport

The site is less than a five minute walk (400m) from the nearest bus stop located on Sunflower Way. The bus services that operate from these stops follow routes that incorporate key local employment and retail centres. The bus services provide a direct connection to Andover Railway Station, which in turn provides a connection to London Waterloo and Salisbury.

For wider connectivity, the Site is 3.3km from Andover railway station providing rail links via the Southern Rail network.



Figure 3. View of the Site, looking west towards East Anton



Figure 4. View of East Anton Local Centre



## 02 - Understanding the Context

There is an opportunity at Finkley North to create a high-quality, low carbon and nature first development that forms a logical extension to Andover whilst respecting the green separation with Smannell and Enham Alamein.

Our ambition is to assimilate development into the local context, providing a sensitive design response that goes beyond mitigation of landscape, nitrates and biodiversity to deliver significant overall environmental net gains.







## A Sensitive Environmental Design Response

The site lies on the suburban edge of Andover and is a sustainable location in terms of its proximity to services and the opportunities to create active travel and public transport connections.

As a green field site, there are important environmental design considerations to address including landscape, heritage, arboriculture, ecology, biodiversity and nitrates. We believe that a holistic response will ensure an environmentally sensitive landscape-led masterplanning approach.



## Landscape and the Local Gap

**Our landscape work to date has considered the sensitivity of this area, taking into account the characteristics of the site and the wider landscape setting. Understanding the landscape sensitivities associated with new development is an important consideration in the masterplanning process. The identification of key landscape features and sensitive locations, including viewpoints have been incorporated into the current layout.**

A review of the Local Plan finds the Site lies wholly within a Local Gap, a designation covered by policy E3, which states:

*"Development within Local Gaps will be permitted provided that:*

- a) it would not diminish the physical separation and/or visual separation; and*
- b) it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap."*

This has been considered in the development of a landscape-led strategy that will preserve the integrity of the Local Gap.

The Site is also located 700m to the west of the North Wessex Downs AONB, however intervening vegetation, landform and other landscape features deminish any visual or perceived links with the designation.

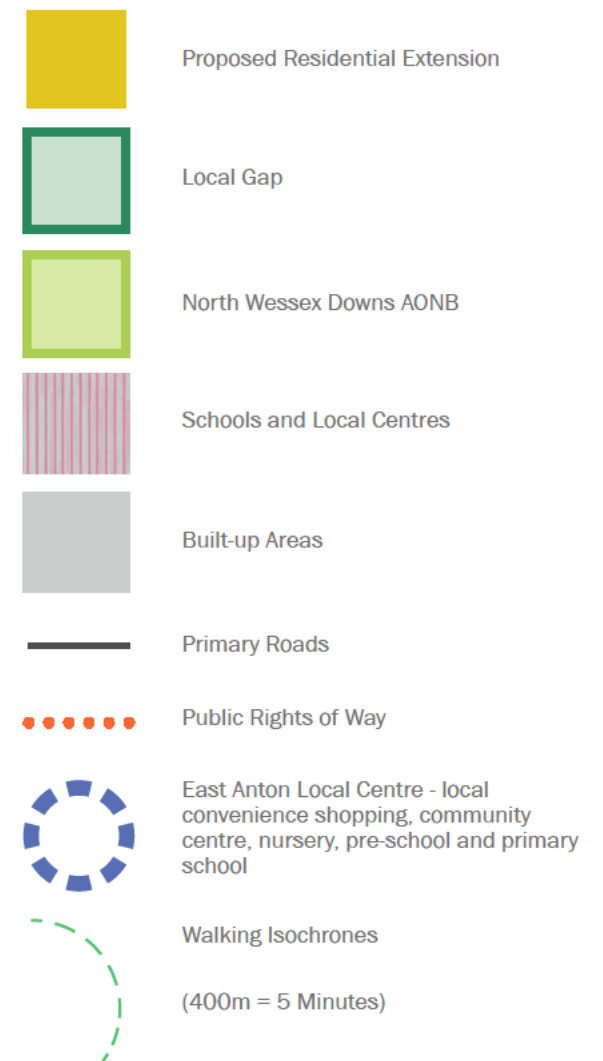
## Responding to Topography

**The masterplan will be designed to ensure development is nestled into the lower lying area of the site, avoiding the higher ground to the north and east. Spatially this relates well with the urban context to the west in East Anton, and it allows for planting on the perimeter to create a well defined boundary to the settlement and a more gentle transition from urban form to open countryside.**

A review of the site's topography and context highlights a subtle valley that follows the alignment of Smannell Road. The site and area for nitrate mitigation and ecological enhancement therefore lies on sloping land with Smannell Road defining the natural low point along the eastern and western boundaries respectively.

The site rises west to east a total of 17m from a low point of 77m above Ordance Datum (aOD) on the western side to 94m aOD on the eastern side. The steepest section can be found at the centre of the site, becoming more gradual towards the east.

The Nitrates Mitigation and Ecological Enhancement land is more gradual and rises 12m from 84m aOD on the eastern side to 96m aOD.



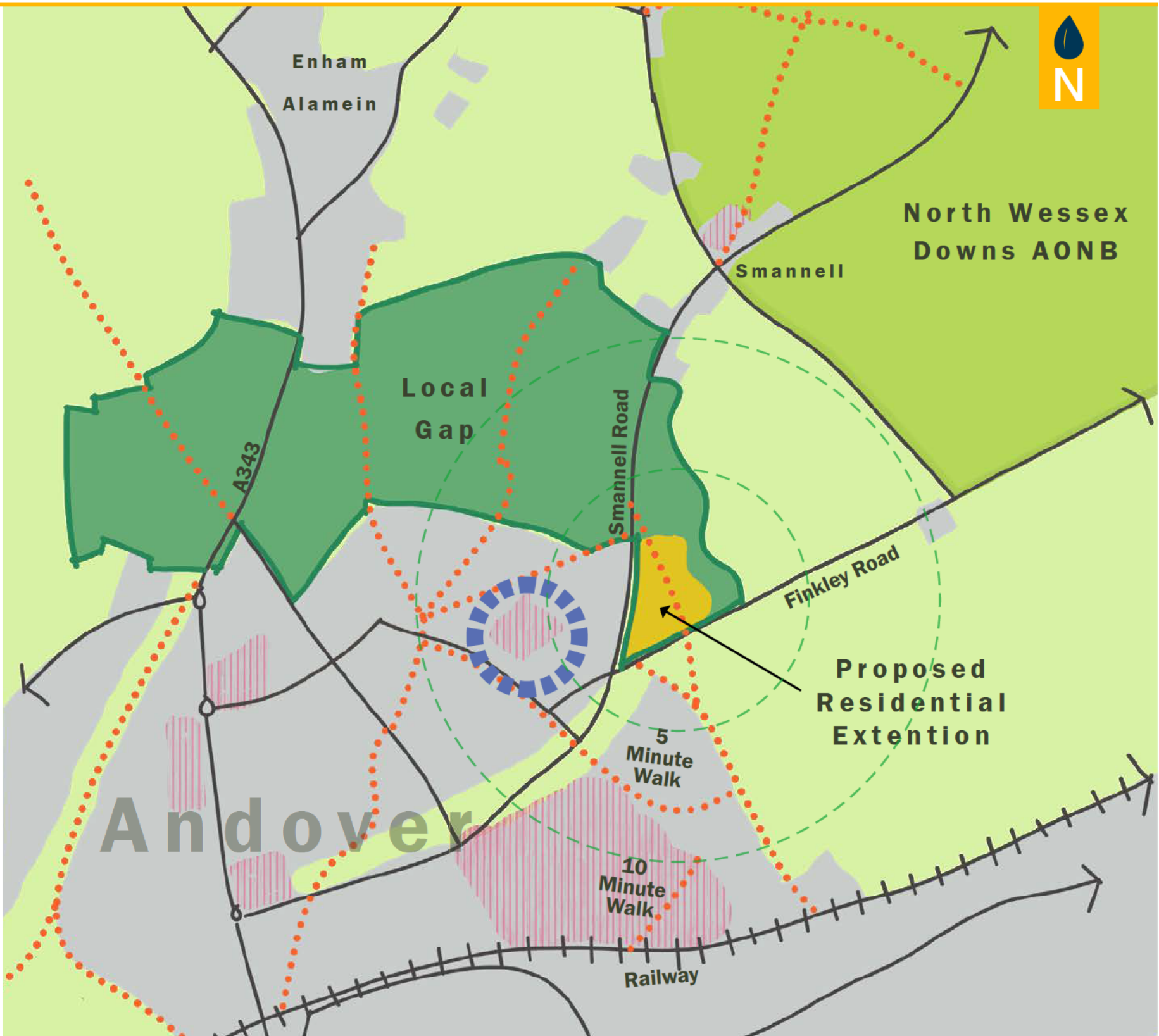


Figure 5. Environmental Designation Context

## Arboriculture

Trees should be prioritised for retention, wherever appropriate and practicable. These trees are primarily outside or around the perimeter of the site and therefore do not adversely constrain development.

The Arboricultural Assessment of the site has been carried out that identified the following: 13 Category A trees (high quality tree); and 24 categorised B trees (moderate quality).

The default position when designing any forthcoming scheme should be the retention of all trees, so far as is practicable, regardless of category grading. All trees provide positive environmental and ecological contributions, irrespective of current condition. Where trees or hedgerows do need to be removed (for example to make way for access), the least harmful design solution will be sought and compensatory planting made to mitigate for the loss over and above the existing biodiversity value. It is intended that a significant amount of new tree planting will take place within the scheme which will increase the overall tree cover and provide biodiversity value.

## Heritage and Archaeology

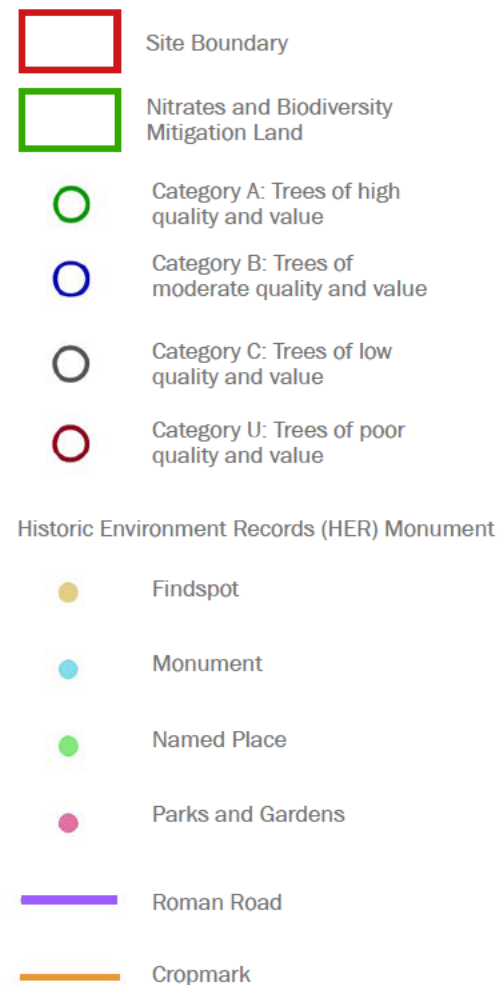
Completion of a desk study and site visit shows that the site does not contain any 'designated' heritage assets (such as scheduled monuments) and neither is it included within the boundary of a designated heritage asset such as a conservation area or a Registered Park and Garden (RPG).

The nearest designated assets to the site comprises the group of Grade II listed buildings in Smannell c.350m to the north; i.e. Christ Church, the Primary School and Church farmhouse; whilst Finkley Manor Farmhouse and the collection of farm buildings at East Anton Manor Farm are all located more than 600m away (east and west respectively).

None of these assets are likely to be adversely affected by the proposed development through changes within their wider setting and they should not constrain the deliverability or capacity of the site for residential development.

Consultation with the Hampshire Historic Environment Record (HER) has shown that the site is located in an area containing known archaeological sites, monuments and findspots of middle prehistoric to 20th century date and representing a range of different activities including Bronze Age burials, a Roman settlement at East Anton, the historic park around Finkley House and a WWII anti-aircraft gun battery.

The site contains cropmark features representing below ground remains of a probable field system, but, whilst it is recognised that further investigation and assessment will be required through the planning process to determine their significance and the most appropriate response to their conservation, there is no reason to believe or expect that they will represent a significant constraint to the site's deliverability or capacity for development.





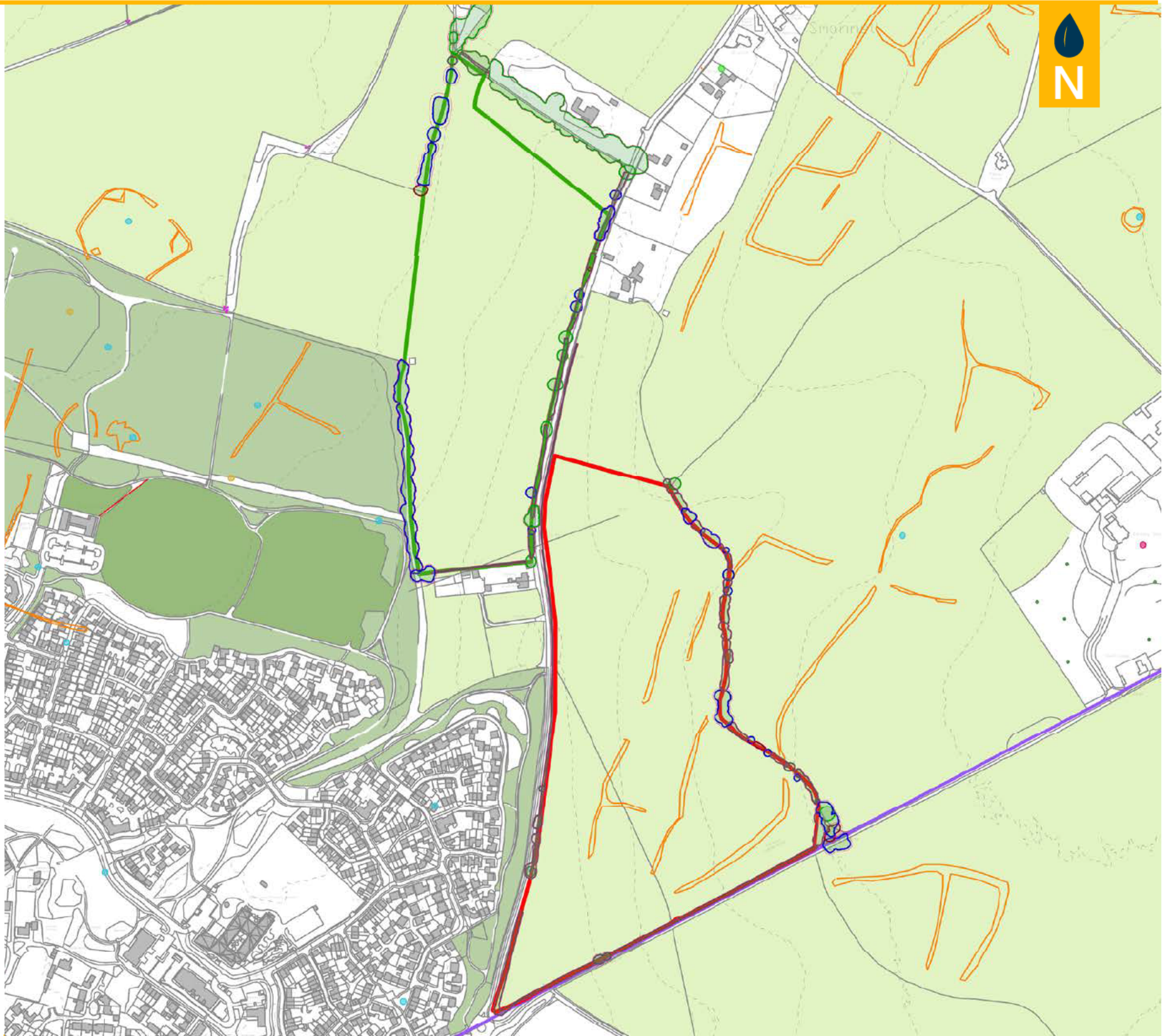


Figure 6. Environmental Considerations Context





## Nitrate Neutrality

Following the release of Natural England's 'Advice on Achieving Nutrient Neutrality for New Development in The Solent Region' (version 3 March 2020) consideration must also be afforded to the Solent Maritime SAC, Chichester and Langstone Harbours Special Protection Area (SPA), Portsmouth Harbour SPA, Solent and Southampton Water SPA as well as the nationally designated Sites of Special Scientific Interest (SSSI) that underpin them and the associated internationally designated Ramsar sites.

It has been established that these 'Solent Sites' are suffering from high levels of nitrogen and phosphorus input – primarily as a result of agricultural activity – which is causing eutrophication and adversely impacting these statutory sites of European/international importance. As it stands, there is uncertainty as to whether new growth within the region will further deteriorate designated sites.

In light of the potential impacts new development might have on these 'Solent Sites', and given the strict protection afforded to Special Area of Conservation (SACs), SPAs and Ramsar sites by the Conservation of Habitats and Species Regulations 2017 (as amended), the interim and precautionary position is that all new development within The Solent region must achieve 'nutrient neutrality'. This is to ensure wastewater

from new development will - at the very least - not add to the existing nutrient burden on the solent sites.

As such, in line with adopted interim guidance, any forthcoming development will need to demonstrate its ability to achieve nutrient neutrality via a nutrient budget. It is considered that subject to an appropriate landscaping scheme, in addition to specific mitigation measures (including the utilisation of specific off-site mitigation land), there is more than sufficient scope for the proposals to fully accord with adopted guidance and achieve nutrient neutrality.

**By taking the land out of intensive agricultural management and reverting large swathes of it to a more naturalistic landscape, including large areas of species-rich grasslands and ecologically beneficial woodland and scrub, the proposed scheme could remove an estimated c.161 kg of nitrogen per year out of the local waterways.**

**"Remove c.161 kg of nitrogen per year"**



# Ecology & Biodiversity

## Statutory Designations in the Area

There are no designated sites of nature conservation interest located within or immediately adjacent to the site. The closest non-statutory designated site of local value is the Post Grove Copse SINC (approximately 1km to the north). The closest statutory designated site of national value, Anton Lakes Local Nature Reserve (LNR) is located approximately 1.3km west of the site. It is considered that any potential adverse effects on the statutory designated sites (direct or indirect) can be fully mitigated through appropriate design.

## Existing Habitats on Site

The vast majority of the site comprises an intensively managed arable field which, itself is of negligible intrinsic value. Of comparatively greater ecological significance are the species-rich hedgerows, mature tree lines and woodland edge habitats which border the site. From the survey work undertaken to date, there is no evidence to indicate any overriding constraints that would prevent the scheme coming forward. Indeed, it is considered that the emerging proposals offer significant opportunities to enhance the value of the site for protected and notable faunal species.

## Increasing Biodiversity

The emerging proposals will ensure that the biodiversity value of the habitats present within the site are not only retained, but are significantly enhanced as part of the development. The proposals will target a c.56% biodiversity net gain as a consequence.

**"The proposals will target a c.56% biodiversity net gain"**

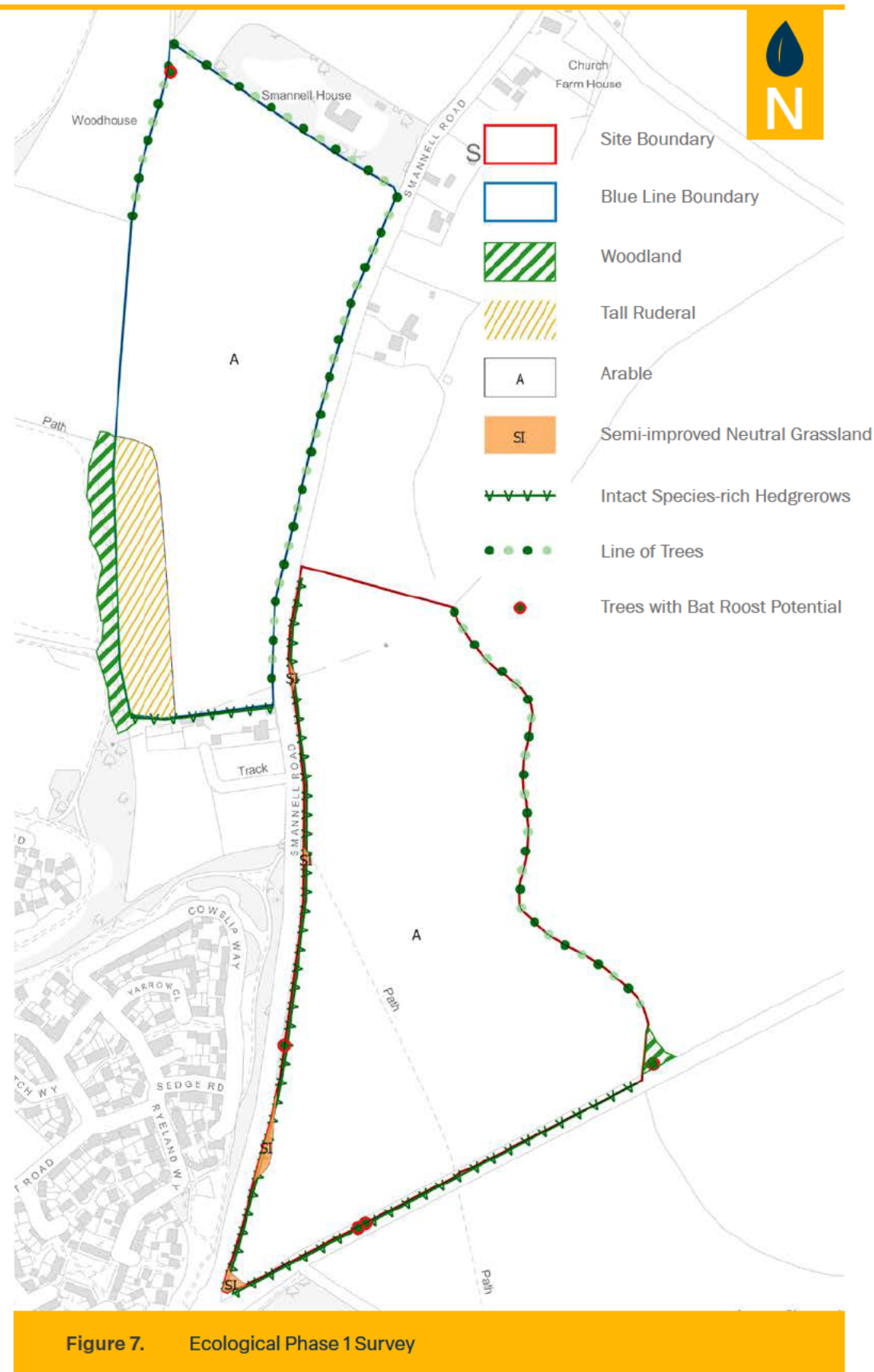


Figure 7. Ecological Phase 1 Survey


## 03 - Environmental Placemaking

The vision for Finkley North is to create a high-quality development that is founded on strong environmental placemaking principles. The proposed development will be assimilated into the local landscape and urban context through a generous green infrastructure network that will create a place for people and nature.

Neutrient neutrality will be delivered on site, with a potential surplus of nitrates credits. The proposals will also target a c.56% biodiversity net gain, well beyond current policy requirements, providing a potential surplus of biodiversity credits. New opportunities for play and recreation and a network of active travel routes to East Anton, as well as nature trails will be provided.





A photograph of a man and a woman walking away from the camera on a grassy path in a forest. The woman is wearing a dark jacket and a colorful patterned scarf, and the man is wearing a dark green jacket and blue jeans. A light-colored dog is walking ahead of them. To the right, there is a wooden fence made of vertical posts and horizontal rails. The background is filled with trees and foliage, some with autumn-colored leaves. A dark blue text box is overlaid on the right side of the image.

## A Place for Nature and People

The extensive green infrastructure opportunity at Finkley North will create a place where nature conservation is prioritised. However this is not to the detriment of creating a place for people.

The proposals show how a beautiful housing development will be embedded within the landscape, with multiple benefits for residents existing and new. Recreational routes, play spaces, and living in nature will create a sense of community wellbeing.

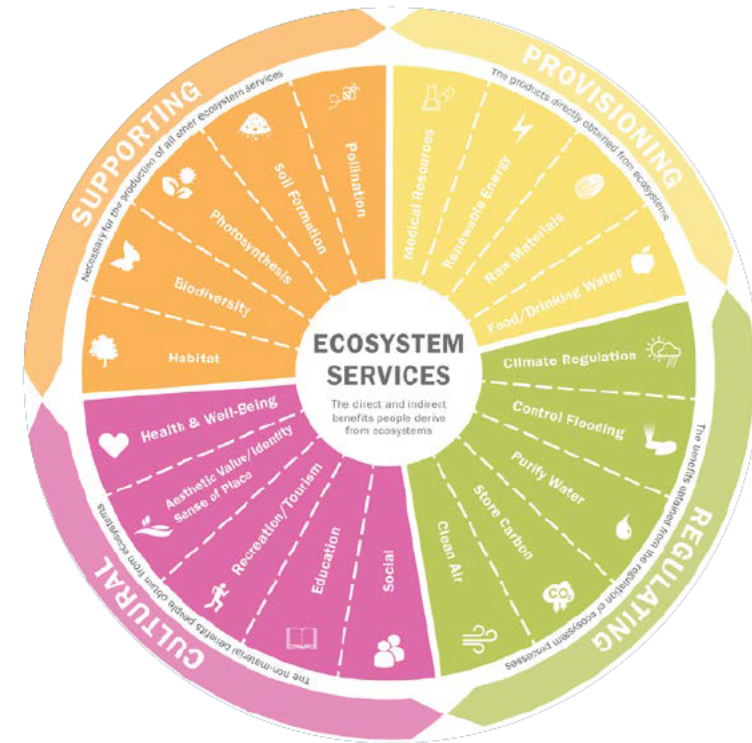


# A Green Infrastructure Concept

The Green Infrastructure Concept for Finkley North has been developed to ensure the delivery of a range of ecosystem services. Ecosystem Services are the direct and indirect contributions ecosystems (known as natural capital) provide for human wellbeing and quality of life.

The multi-functional and connected green infrastructure will strengthen the local green gap, provide significant biodiversity and benefits and create well connected publicly accessible recreational open space through the provision of a strategic green infrastructure network. The masterplanning approach is led by these environmental principles to ensure that new homes can be delivered whilst protecting the environment, and potentially going beyond current policy standards.

The key findings from Section 02 of this document - Understanding the Context, have informed a set of green infrastructure design principles that underpin the overarching development vision. These are as follows:



EDP's Ecosystem Services Wheel. Ecosystem services can be categorised into those that are supporting, provisioning cultural and regulating.

## Delivering Benefits:

### 1. HEALTH AND WELLBEING

Create a landscape for people, that forms a beautiful setting in which to live and provides a wide range of functions including walking and cycling trails, natural play facilities, spaces for contemplation and relaxation and food growing opportunities.

### 2. RESPECT THE LOCAL GREEN GAP

Respect the integrity of the Local Gap separating Smannell and Andover to avoid the coalescence of the two settlements through careful consideration of topography, structural planting and the spatial settlement pattern;

### 3. NATURE RECOVERY NETWORKS

Retain historic landscape features, including existing trees, hedgerows and woodland. Extend and enhance these features to create a nature recovery network that connects beyond the boundaries of the site;

### 4. NUTRIENT NEUTRALITY

Create new habitats and sustainable drainage systems that result in a reduction in nitrate pollution entering local river catchments and The Solent. **Remove c.161 kg of nitrogen per year;**

### 5. BIODIVERSITY NET GAINS

Ensure all proposed habitats respond to the existing landscape condition and create a tapestry of enhanced and new habitats that delivers a biodiversity net gain beyond current policy levels. **Targeting a biodiversity net gain of c.56%; and**

### 6. CLIMATE POSITIVE

The extensive new planting and habitat creation will help with the urban cooling effect, the sequestration of carbon and management of rainwater and flooding.



**1** Existing community woodland, Diamond Wood, and East Anton Sports Ground form a distinct landscape edge to Andover with recreational and biodiversity functions.

**2** Nitrates and Ecological Mitigation Land forms opportunity to create a significant biodiversity asset extending Diamond Wood and strengthening the Local Gap.

**3** Land slopes down from east to west towards Smannell Road. Opportunity to strengthen the settlement edge with new planting to the north and east on the higher ground to enclose development.

**4** Position development on the lower lying ground where it relates well to existing built form.

**5** Mirror the green set-back on the eastern side of Smannell Road and retain rural character.

**6** Link into the existing GI corridor and active travel route connection to access education, retail and community facilities at East Anton Local Centre.

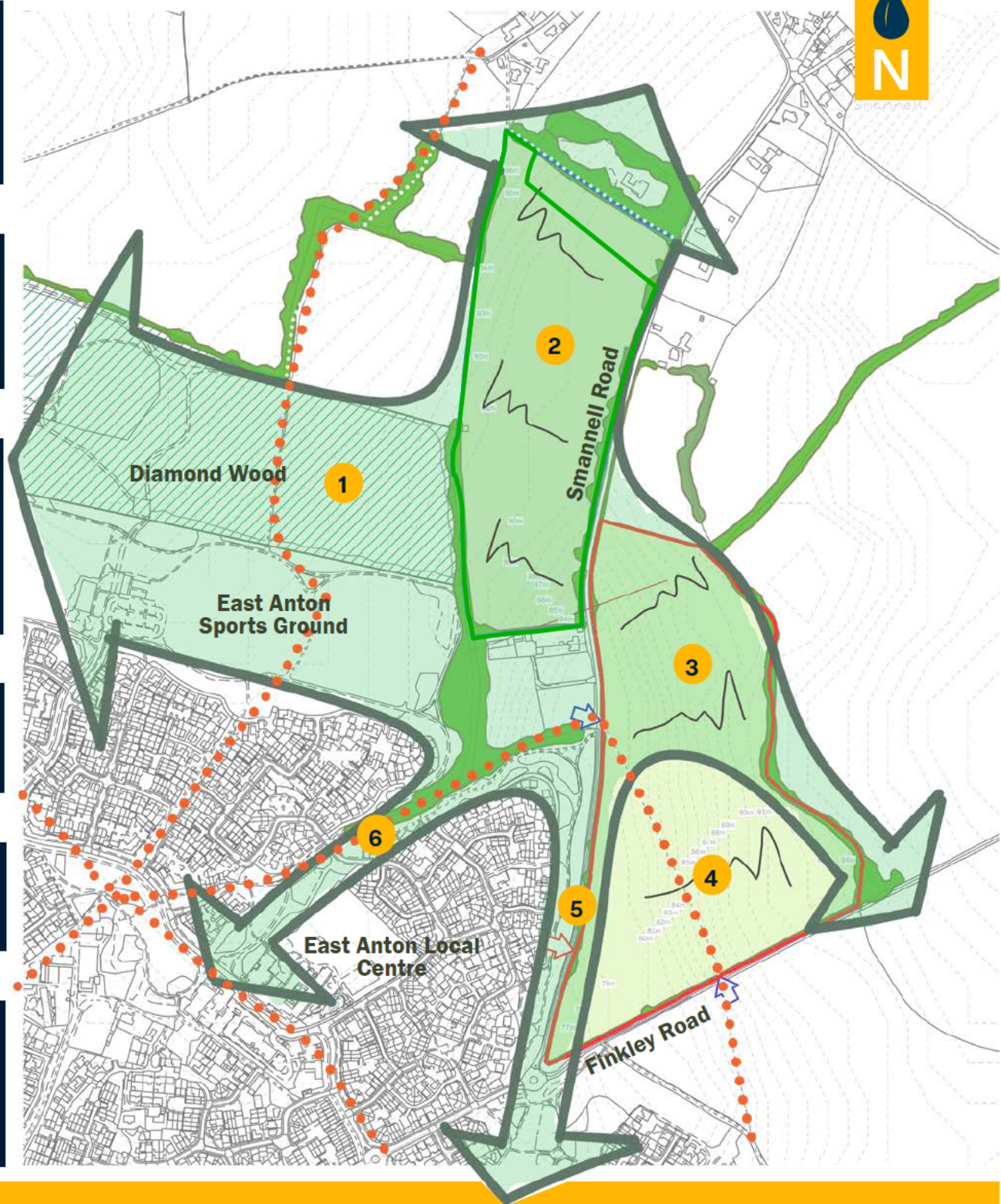


Figure 8. Green Infrastructure Strategy

# Illustrative Masterplan

The site is considered to be a suitable location for a development of around 200 homes, whilst also delivering extensive green infrastructure. It is well related to the new community and existing facilities at East Anton and forms a logical next phase of growth at north-east Andover.

Finkley North - Land East of Smannell Road, Andover offers an opportunity for new housing set within a generous landscape framework. It will be a place for both people and nature. The development provides extensive habitat creation, recreational spaces and a focus on wellbeing and community.

The development area is located on the lower contours, avoiding land to the east and north of the site to spatially 'round-off' of the existing settlement without projecting into the landscape. This approach forms a sensitive response to the local green gap policy.

The site will be provided with an access off Smannell Road, approximately 300m to the north of the roundabout between Smannell Road and Finkley Road.

A secondary point of access can be provided off Finkley road for emergency vehicles and active travel, if required.

New walking links set within attractive areas of meadow and woodland will improve the connectivity between Smannell and Andover.

1. Mown footpaths through species-rich grassland will create informal recreational walking routes.
2. Proposed pedestrian access points and crossing creating a through route to the East Anton Sports Club, Diamond Woods and Local centre.
3. Area for nitrates mitigation and ecological enhancement. Proposals to include new woodland planting, species-rich grassland and recreational walking routes.
4. Strategic woodland planting to define the northern edge of this part of Andover aligned with adjacent development at East Anton. Woodland corridor forming an ecological connection and active travel link.
5. Boundary planting improved through new tree and scrub planting, creating a soft edge.
6. Vehicular, cycle and pedestrian access point
7. Drainage basins form attractive features at gateways to the site
8. Existing public right of way integrated within a green corridor.
9. Potential secondary vehicle access of Finkley Road. Public right of way to be retained.



**c.20.35HA OF PUBLICLY ACCESSIBLE PARKLAND**



**GREEN LINKS TO EAST ANTON AND OVER 3.5 KM OF NATURE TRAILS**



**REDUCTION OF c.161KG NITRATES ENTERING THE SOLENT CATCHMENT**



**TARGETING A BIODIVERSITY NET GAIN OF c.56%**





Figure 9. Illustrative Masterplan





Andover Railway Station

Anton Lakes

A343

East Anton Local Centre

East Anton Sports Ground

Nitrate Bio Mitigation

Smannell Road

Development nestled into lower ground with planting to create a soft development edge and transition into the countryside

Figure 10. Visualisation of Finkley North, showing the sensitive integration with the urban and landscape context

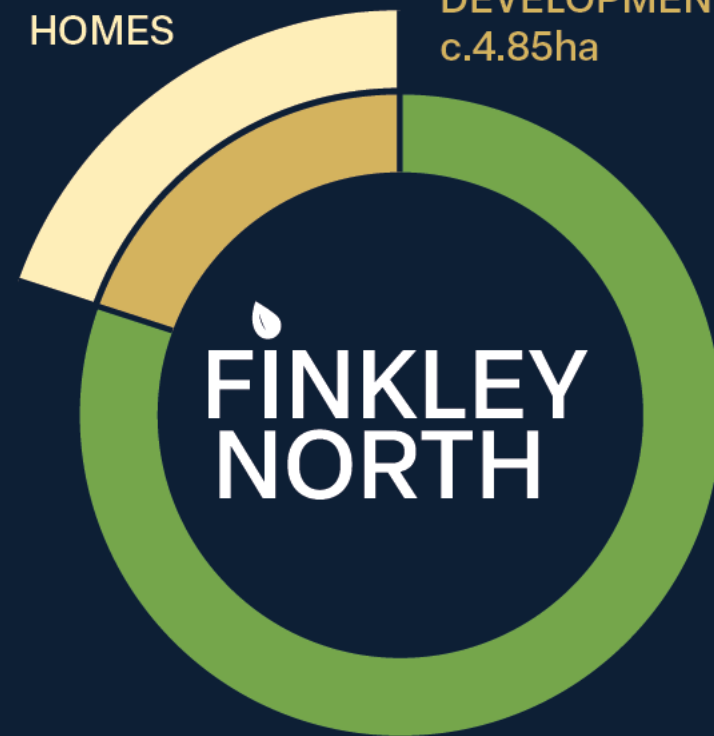




## Summary of Proposals

AROUND 200  
HOMES

20% RESIDENTIAL  
DEVELOPMENT  
c.4.85ha



FINKLEY  
NORTH

80% GREEN  
INFRASTRUCTURE  
c.20.35ha

c.161 KG NITRATE REDUCTION  
c.56% BIODIVERSITY NET GAIN

### Low Carbon Living

The development will be accessible by sustainable modes of transport with a network of active travel routes and leisure routes to key destinations. New homes will be built with a fabric first approach and utilise renewable technologies.

### A 15 Minute Neighbourhood

The proposals form a logical extension to East Anton, an established community with a local centre, schools and sports club. A network of walking and cycling routes will provide safe, direct and traffic-free connections into East Anton.

### A Nature-Led Solution

A comprehensive green infrastructure strategy will enhance the site's biodiversity and assimilate the development into the surrounding landscape setting. A reduction in nitrates will be achieved by reverting the land to natural habitats, helping mitigate impacts to local rivers and The Solent.

edp

The Environmental Dimension Partnership

**BLOOR HOMES**