

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

## COMMENTS FORM

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

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

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

Part A: Your Details

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

Further information can be found on our website at:

[www.testvalley.gov.uk/localplan2040](http://www.testvalley.gov.uk/localplan2040)

Once the form has been completed, please send to [planningpolicy@testvalley.gov.uk](mailto:planningpolicy@testvalley.gov.uk) below by **noon on Tuesday 2<sup>nd</sup> April 2024**.

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

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

### Contacting us

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## Part A: Your Details

Please fill in all boxes marked with an \*

|  |                       |                |       |
|--|-----------------------|----------------|-------|
| Title*<br>Mr/Mrs/Miss/Ms/Dr/Other<br>(please state)              | Mr                    | First<br>Name* | James |
| Surname*   | Millard               |                |       |
| Organisation*<br>(If responding on behalf<br>of an organisation) | Blue Fox Planning Ltd |                |       |

Please provide your email address below:

|                   |  |
|-------------------|--|
| Email<br>Address* |  |
|-------------------|--|

Alternatively, if you don't have an email address please provide your postal address.

|          |          |  |  |
|----------|----------|--|--|
| Address* |          |  |  |
|          |          |  |  |
|          | Postcode |  |  |

If you are an agent or responding on behalf of another party, please give the name/ company/ organisation you are representing:

|                      |
|----------------------|
| Taylor Wimpey UK Ltd |
|----------------------|

### Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/ postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment.

All representations and related documents will be held by the Council until the Local Plan 2040 is adopted and the Judicial Review period has closed and will then be securely destroyed.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are

available on our website here:  
<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

## Part B: Your Comments

Please use the boxes below to state your comments. This includes one box for general comments and another for specific comments related to an area of the Local Plan.

Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

|                              |
|------------------------------|
| <b>General</b>               |
| Please see attached document |

For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible. Please use the box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

| Paragraph Ref | Specific Comments            |
|---------------|------------------------------|
|               | Please see attached document |

### What happens next?

All valid responses received within the consultation period will be acknowledged and you will be given a reference number. Please quote this reference number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent directly to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.



# **DRAFT TEST VALLEY LOCAL PLAN 2040 REGULATION 18 (STAGE 2)**

## **RESPONSE TO CONSULTATION**

Prepared on behalf of Taylor Wimpey UK Ltd

April 2024



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## 1. Introduction

- 1.1 On behalf of our client, Taylor Wimpey UK Ltd, Blue Fox Planning is instructed to submit representations in response to the Test Valley Local Plan 2040, Regulation 18 (Stage 2) consultation. This Stage 2 follows the Stage 1 consultation undertaken in 2022 and comments submitted on behalf of Taylor Wimpey to that consultation (Respondent ID Ref: 10133)
- 1.2 Taylor Wimpey UK Ltd are currently completing the Augusta Park (East Anton) new neighbourhood development at Andover and have submitted comments to earlier rounds of consultation on the Local Plan, including the Issues and Options (2018) and the Refined Issues and Options (2020).
- 1.3 Through previous representations to Local Plan consultations, and submissions to the Strategic Housing and Economic Land Availability Assessment (SHELAA), Taylor Wimpey has continued to promote land at Finkley Down Farm (Andover) as a suitable and logical development location, providing a coherent and sustainable extension to the Augusta Park (East Anton) development at the only Tier 1 settlement within the Northern Test Valley (NTV) Housing Market Area (HMA).
- 1.4 Land at Finkley Down Farm is identified within the SHELAA (site reference: 165) and within this current Reg 18 (Stage 2) consultation is listed within the 'Preferred Pool' of site options within the NTV HMA.
- 1.5 Land at Finkley Down Farm is not identified within this current version of the Local Plan as a proposed site allocation, being rejected in favour of alternatives at Andover and at the edge of the Wiltshire market town of Ludgershall.
- 1.6 The overarching strategic approach, specifically in respect of the continued split of the Borough into the two distinct Housing Market Areas (HMAs); the identified Local Housing Need (LHN); and the continued focus within the proposed Spatial Strategy to direct growth towards the Tier 1 settlements of Andover and Romsey, is supported as a matter of principle.
- 1.7 However, the proposed distribution of growth within the NTV HMA and the site selection process pertaining to Land at Finkley Down Farm and other sites listed within the Preferred Pool of sites, raises concerns regarding the consistency and robustness of this process.
- 1.8 Our representations demonstrate that land at Finkley Down Farm represents a suitable, sustainable and logical development location at Andover. Moreover, based on our review of the evidence base, we consider that Land at Finkley Down Farm represents a more appropriate and suitable development location, when compared to other sites which are proposed to be taken forward as allocations.

## 2. Land at Finkley Down Farm

- 2.1 As an extension to the Augusta Park development area, land at Finkley Down Farm provides a genuine opportunity to support the delivery of a significant number of new homes (c.1,500 dwellings) and associated infrastructure, and in doing so, supporting the role of Andover as a top tier settlement.
- 2.2 Indeed, its location adjacent to Andover, is recognised within the SHELAA as being accessible to the widest range of facilities and services which are present at this major centre. It being a location which also maximises sustainable transport choices and is more accessible due to better public transport provision.
- 2.3 Development at Finkley Down Farm can support a highly sustainable movement strategy, maximising sustainable transport choices, specifically public transport connections to key destinations in and around Andover. Responding positively and creatively to support a highly sustainable pattern of development, incorporating robust and deliverable strategies for carbon reduction/neutral measures, net gains in biodiversity, landscape enhancements and protections, and protection of heritage assets will frame the emerging proposals at Finkley Down Farm.
- 2.4 Our previous submissions to the SHELAA (August 2022) are appended to our representations which demonstrate the following:
- The Vision and objectives to create a high-quality and logical pattern of development.
  - A clear strategy for sustainable travel patterns.
  - The ability to achieve significant gains in biodiversity.
  - The commitment to delivering high-quality and sustainable development, responding positively to the declared climate emergency and opportunities for reducing the carbon impact of development.
  - The absence of any flood risk or drainage constraints that would impact on the ability of this site to deliver the proposed development.

### **APPENDIX 1: 2022 SHELAA SUBMISSIONS**

- 2.5 As part of our representations to this Reg 18 consultation a Landscape and Visual Overview of site allocations at Andover and Ludgershall has been prepared by *CSA Environmental* (see Appendix 2).
- 2.6 This assessment looks at the proposed housing allocations identified in the draft Local Plan on the periphery of Andover and Ludgershall and considers their ability to accommodate residential development, in landscape/townscape and visual terms.

- 2.7 Based on the Council's own findings, the land at Finkley Down Farm presents one of the least sensitive options in landscape and visual terms for strategic scale growth in the borough.

## **APPENDIX 2: LANDSCAPE REPRESENTATIONS**

- 2.8 Our representations are also supported by specific analysis of transport related matters, including the Council's evidence base, specifically the Sustainability Appraisal and strategic modelling, both of which are key evidence documents which have been used to justify the allocations as proposed.

## **APPENDIX 3: TRANSPORT REPRESENTATIONS**

- 2.9 The appended transport submission concludes that Finkley Down Farm ranks as the highest placed site when considering the Sustainability Appraisal Transport objectives.
- 2.10 Furthermore, we demonstrate within our transport submissions that both Land East of Ludgershall and Land South of the A342 are preferred options to Land at Finkley Down Farm within the Sustainability Appraisal, despite them scoring much lower on the Sustainability Appraisal Transport Objectives.
- 2.11 In addition to the above we also submit as part of our representations an *Ecology Note* which sets out in detail the ecological conditions of land at Finkley Down Farm and also reviews the evidence base, specifically the Sustainability Appraisal.
- 2.12 For Finkley Down Farm this *Ecology Note* shows that the site contains habitats of limited ecological interest, with those of greatest value associated with the native hedgerows and mature trees at field boundaries. As such, and subject to future detailed assessment, it is reasonable to conclude that any potential negative effects on protected or priority species could be readily addressed through habitat creation within strategic green infrastructure corridors.
- 2.13 The review of the Sustainability Appraisal considers that the negative scoring assigned to Finkley Down Farm within the Housing Site Appraisal suggests are misplaced. The presence of parcels of Ancient Woodland and Sites of Importance for Nature Conservation within the surrounding landscape are not considered to represent a constraint to the principle of development at the Site, and there is no significant risk of development impacting the off-site TPO trees. In these regards, the Housing Site Appraisals have not applied criteria consistently across site promotions.
- 2.14 The remaining constraints, such as the need to deliver nutrient neutrality and secure a net gain in biodiversity, are ubiquitous requirements to all strategic allocations.

2.15 No overriding constraints have been identified to suggest that development at the Site could not be achieved in a manner consistent with emerging policies BIO1-5.

#### **APPENDIX 4: ECOLOGY NOTE**

### 3. Spatial Strategy / Settlement Hierarchy

- 3.1 The Spatial Strategy provides the overarching framework and details where sustainable development will be supported and the type and scale of development. Paragraph 3.12 of the Stage 2 document confirms the market towns of Andover and Romsey, as the largest settlements in the Borough with the widest range and number of facilities, are at the 'core' of the spatial strategy. As such these settlements continue to be a focus for development which is supported.
- 3.2 The Settlement Hierarchy is a key component of the Spatial Strategy and classifies settlements based on their sustainability and their role and function, including access to services and facilities.
- 3.3 Paragraph 3.33 confirms that Andover and Romsey (Tier 1 settlements) remain the most sustainable settlements and perform a key role in supporting the needs of the wider population in Test Valley. This is set out within Spatial Strategy Policy 1 (SS1) which supports strategic allocations as being appropriate scales of development at these settlements. This represents a sound approach.
- 3.4 However, for reasons set out within our representations we do not support the proposed approach within the Spatial Strategy to direct a significant quantum of planned housing growth to the east of the Wiltshire market town of Ludgershall. It is considered that this approach is inconsistent with the objectives of the spatial strategy and moreover, the site selection process does not support sites at Ludgershall in favour of development options at Andover, specifically in respect of land at Finkley Down Farm.
- 3.5 Policy SS3 sets out the housing requirement (Local Housing Need – LHN) for the Borough, this being a minimum of 11,000 homes over the plan period to 2040, which equates to 550 homes per annum. This is derived through the Standard Method approach and compares with the conclusions of the Strategic Housing Market Assessment (SHMA), which identifies a local housing need of 541 dwellings per annum.
- 3.6 The use of the Standard Method is supported and is consistent with the National Planning Policy Framework (NPPF). It is acknowledged that paragraph 61 of the NPPF states that the outcome of the Standard Method is an advisory starting point for establishing a housing requirement for the area. Given the alignment between the SHMA and the Standard Method, this demonstrates that the minimum requirement set out within this Regulation 18 (Stage 2) consultation provides an appropriate basis upon which housing delivery over the plan period should be defined.
- 3.7 It is noted and supported that the evidence base, including the *Housing Topic Paper*, do not consider that there are exceptional circumstances that would justify an alternative approach to assessing housing need.

- 3.8 Paragraph 63 of the NPPF requires that when establishing housing need, the needs of different groups in the community should be assessed and reflected in planning policies. This includes those who require affordable housing.
- 3.9 Currently the affordable housing target for the Borough is 200 affordable dwellings per year. Paragraph 5.354 of this Regulation 18 (Stage 2) consultation document explains that the SHMA identifies an affordable housing need of 437 affordable homes for rent and 215 affordable home ownership homes per year. A figure which is significantly above current affordable housing delivery targets.
- 3.10 Paragraph 3.15 of the *Housing Topic Paper* considers whether there is an affordable housing need that would justify a housing requirement above the 550 per annum requirement. Within the *Housing Topic Paper* it explains absolute affordable housing need is 120% of the local housing need derived through the Standard Method and would lead to a housing requirement of 1,222 dwellings per annum.
- 3.11 We do agree that in identifying need, this is not a simple calculation of affordable housing need and planned delivery and caution is needed in terms of extrapolating outcomes to form a direct link between affordable need and planned delivery. As explained at paragraph 3.13 of the *Housing Topic Paper*, in many cases households which are identified as having a need will already be living in housing and therefore providing an affordable option does not lead to an overall net increase in housing.
- 3.12 The Whole Plan Viability Assessment prepared in support of this Regulation 18 consultation concludes that a policy approach of 40% affordable housing should be retained and applied on a maximum reasonable approach basis, taking site specific constraints into account.
- 3.13 Therefore, improving affordable housing delivery is limited in terms of what can be achieved from specific sites, i.e. not exceeding 40%. This would suggest and add justification for the Local Plan to consider additional sites with their own affordable housing contribution, which would support wider opportunities for enhanced affordable housing delivery.
- 3.14 This consultation document (see paragraph 5.356) accepts that the affordable housing threshold does not provide for the affordable housing need in full and that the Council will seek to provide for the maximum affordable housing it can achieve.
- 3.15 Historically the Borough has achieved net annual affordable housing completions above the current target of 200 dwellings per year. Although it is noted that the latest completion figures (2022/23) show that just 140 affordable dwellings were delivered. This is significantly below previous years and below the 200 per annum target. Furthermore, it is significantly below the 'need' identified in the SHMA.

- 3.16 As noted within the latest Annual Monitoring Report (2022-23) a significant proportion of affordable provision has been provided as part of the Borough's New Neighbourhoods, including land at East Anton (Augusta Park), Picket Piece and Picket Twenty in Andover. It is therefore evident that large scale strategic sites are an important delivery mechanism for affordable housing across the borough and within the NTV HMA.
- 3.17 The broad distribution of the LHN between the two Housing Market Areas (HMAs) is as follows:
- Northern Test Valley: 6,270 homes (313 homes per annum)
  - Southern Test Valley: 4,730 homes (237 homes per annum)
- 3.18 The housing requirement for the Borough and the HMAs relates to the 2020 to 2040 plan period, therefore completions and commitments since 2020 are to be deducted from this requirement.
- 3.19 Table 6 of the *Interim Sustainability Appraisal* identifies the housing quantum for the NTV sub area, taking into account completions and commitments, as well as an allowance for windfall and Neighbourhood Plan areas. Resulting in a residual housing requirement for the NTV sub area of 3,752 dwellings (including a 10% supply buffer).
- 3.20 Total supply from proposed allocations as set out at Table 3.3 of the consultation document amounts to 3,790 dwellings, with specific site allocations set out at Policy SS6 (Meeting the housing Requirement). For the NTV sub area, the proposed components of this supply are set out as follows:

| Site  | No. of homes |
|---|--------------|
| Land south of London Road, East Andover               | 90           |
| Land at Manor Farm, North of Saxon Way, North Andover | 800          |
| Land at Bere Hill, South East Andover                 | 1400         |
| Land East of Ludgershall                              | 350          |
| Land South East of Ludgershall                        | 1150         |
| <b>Total</b>  | <b>3,790</b> |

- 3.21 Paragraph 4.14 of this Reg 18 Stage 2 consultation document recognises that Andover is a highly sustainable settlement, providing a range of services and facilities and has been the focus for growth in recent years.
- 3.22 This is supported by the Council's *Preliminary Transport Assessment* which states, at paragraph 7.2.1, that:

*Overall, the sites in close proximity to existing urban areas have good accessibility to key destinations and public transport services. The sites to the*

north of the borough situated around Andover have greater access to existing facilities and public transport. (Our emphasis)

- 3.23 Save for proposed allocations at Ludgershall, the Spatial Strategy focuses a significant scale of development at Andover which is supported as a matter of principle and supports the role and function of Andover as the top tier settlement within the Borough and the only Tier 1 settlement within the NTV sub area.
- 3.24 We comment on the site selection process within Section 4 of our representations, but support the ongoing recognition that Andover remains a focus for growth and that strategic allocations are appropriate as extensions to the town. We consider the Spatial Strategy and Growth Scenarios in Section 3.

## 4. Spatial Strategy - Growth Options & Scenarios

- 4.1 The Spatial Strategy and distribution of growth within the NTV sub area is informed by an assessment, within the *Interim Sustainability Appraisal*, of reasonable alternative growth scenarios. Sites which are included within these growth scenarios are identified through the site selection process.
- 4.2 Alongside this the *Preliminary Transport Assessment* assess two growth options comprising a combination of sites which, through the site selection process, have been identified as potential development options.
- 4.3 As stated at paragraph 7.23 of the *Preliminary Transport Assessment*, the purpose of the modelling is:

*“to test the Local Plan spatial growth options and help identify high-level transport impacts and where mitigation may be required.”*

- 4.4 The growth options used in the transport modelling are set out below. Growth Option 1 includes Finkley Down Farm (900 dwelling) and land east of Ludgershall (350 dwellings), but not the land south east of Ludgershall (1,150 dwellings). Growth option 2 includes land south east of Ludgershall, but excludes Finkley Down Farm.

| Site name  | Growth Option 1<br>(dwellings) | Growth Option 2<br>(dwellings) |
|--|--------------------------------|--------------------------------|
| Land east of Ludgershall                               | 350                            | 350                            |
| Land south of bypass                                   | 110                            | 110                            |
| Land at Finkley Down Farm                              | 900                            |                                |
| Land at Manor Farm                                     | 800                            | 800                            |
| Land at Bere Hill Farm                                 | 600                            | 400                            |
| Land at Ganger Farm South                              | 340                            | 80                             |
| Land N King Edward Park, St James Park Wheelhouse Park | 44                             | 44                             |
| Land south of A342 and east of Shoddesden Lane         |                                | 1,150                          |
| Land south of Forest Lane                              | 270                            |                                |
| Bentry Nursery Jermyns Lane                            |                                | 250                            |
| Halterworth  |                                | 1,150                          |
| Land at Bere Hill and Bayliffs Bottom                  | 792                            | 792                            |
| Packridge Farm and land south of Hoe Lane              | 150                            |                                |
| Penton Corner  |                                | 210                            |
| Land south of London Road                              | 90                             | 90                             |

|                            |              |              |
|----------------------------|--------------|--------------|
| Velmore Farm / Castle Lane | 1,070        |              |
| <b>Total Residential</b>   | <b>5,516</b> | <b>5,546</b> |

- 4.5 The *Preliminary Transport Assessment* does not recommend a preference for either Growth Option tested through the transport modelling, as either option is capable of being delivered. The main conclusion of the transport modelling states that:

*Overall, the transport modelling concludes that the network is able to accommodate additional traffic movements from the growth scenarios subject to appropriate mitigations to avoid significant effects. (para 6.166 Preliminary Transport Assessment).*

- 4.6 Notwithstanding the conclusions that the highway network is able to accommodate either growth scenarios, we are concerned with the approach whereby land at Finkley Down Farm is only considered within Growth Option 1, whereas other sites at Andover, including Manor Farm, are assessed under both strategic modelling growth options.
- 4.7 The exclusion of Finkley Down Farm appears artificial and not supported by any relevant evidence.
- 4.8 Given the strategic modelling does not recommend or identify any clear constraints with either growth options, various growth scenarios are taken forward through the *Interim Sustainability Appraisal* providing four growth 'Scenarios', focused on a refined list of preferred sites, reflecting the strategic options in terms of focusing development at Andover, alongside a combined Andover and Ludgershall distribution option.
- 4.9 These growth Scenarios combine site options at Andover and Ludgershall (scenarios 1 and 2) and Andover (scenarios 3 and 4), as shown below.

| Existing / New Site Options             | Scenario 1<br>Andover &<br>Ludgershall (1) | Scenario 2<br>Andover &<br>Ludgershall (2) | Scenario 3<br>Andover<br>Focus (1) | Scenario 4<br>Andover<br>Focus (2) |
|---|--|--|------------------------------------|------------------------------------|
| Total Existing Supply                   | <b>3142</b>                                |  |                                    |                                    |
| Neighbourhood Plan Supply               | <b>40</b>                                  |  |                                    |                                    |
| Bere Hill/Bayliffs Bottom,<br>Andover   | 800  | 800  | 800                                | 800                                |
| South of London Road,<br>Andover        | 90   | 90   | 90                                 | 90                                 |
| Land at Bere Hill, Andover              | 600  | 300  | 600                                | 600                                |
| Land at Finkley Down<br>Farm, Andover   | 0  | 0  | 900                                | 900                                |
| Land south of Forest<br>Lane, Andover   | 0  | 150  | 150                                | 150                                |
| Land east of Ludgershall                | 350  | 350  | 350                                | 0                                  |
| Land south A342 / East<br>Shoddessen Ln | 1150                                       | 1150                                       | 0                                  | 0                                  |
| Land at Manor Farm,<br>Andover          | 800  | 900  | 800                                | 900                                |
| Penton Corner, Andover                  | 0  | 0  | 0                                  | 210                                |

|                    |              |              |              |              |
|--------------------|--------------|--------------|--------------|--------------|
| <b>Total Homes</b> | <b>6,972</b> | <b>6,922</b> | <b>6,872</b> | <b>6,832</b> |
|--------------------|--------------|--------------|--------------|--------------|

- 4.10 Paragraph 7.1 of the *Interim SA* concludes that the preferred growth scenario for the NTV sub area is Scenario 1, which includes significant development to be directed away from Andover to Ludgershall and provides the basis upon which proposed allocations are identified at Ludgershall.
- 4.11 The consequence of this preferred growth option is that almost 40% of total planned strategic development for the NTV sub area is being directed to the edge of the Wiltshire market town of Ludgershall and away from Andover. We do not support this approach.
- 4.12 Ludgershall falls outside of the boundary of Test Valley, located within the Wiltshire administrative area and therefore does not feature within the settlement hierarchy for Test Valley. Directing a significant amount of development to Ludgershall, represents a significant shift in the spatial strategy for the NTV sub area.
- 4.13 The site options at Ludgershall identified within the SA growth Scenarios (growth combinations) are based on the Councils conclusions that such sites are capable of delivering the identified housing requirement in a manner which aligns with the spatial strategy and strategy objectives of the plan. We do not agree that this is the case.
- 4.14 We comment specifically on the justification for the Ludgershall sites within Section 4 and as part of our Transport and Landscape reports appended to our representations, demonstrating that Finkley Down Farm represents a more appropriate and sustainable development option and critically, that the evidence base does not support the decision to allocate these sites in favour of land at Finkley Down Farm.
- 4.15 The relative performance of the growth scenarios against the SA objectives is presented at Table 10 of the *Interim Sustainability Appraisal* and this is replicated below.

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

- 4.16 Paragraph 7.2 of the SA summarises the assessment and selection of the preferred growth scenario as follows:

*The Preferred growth scenario for northern Test Valley is Scenario 1. The appraisal shows that Scenario 1 (Andover and Ludgershall 1) performs well in relation to the SA topics, and in comparison to the reasonable alternative growth scenarios. Scenario 1 performs well in terms of housing delivery and providing for LHN and a 10% supply buffer. Scenario 1 also performs well in terms of transport impact and with a similar impact to Scenario 2. Scenario 1 also performs best in terms of landscape impact. In terms of accessibility to community infrastructure and health, Scenario 1 performs slightly less well than scenarios 3 and 4 which have a greater Andover focus. However, growth adjacent to the market town of Ludgershall has a good accessibility to a range of infrastructure and facilities and this location is also a focus for growth in the emerging Wiltshire Local Plan. (Our emphasis)*

- 4.17 In respect of **accessibility**, the SA (paragraph 6.105) concludes that the Andover focused Scenarios (Scenarios 3 and 4) are the **best** performing growth options, noting that:

*Growth scenarios 3 and 4 are more focussed around Andover where there is better access to community infrastructure than scenarios 1 and 2 with positive effects. Furthermore, with infrastructure improvements taken into account **positive effects** would be enhanced.* (Our emphasis)

- 4.18 The relative performance of the Andover focused growth Scenarios in terms of accessibility is an important consideration in the context of the objectives of the Local Plan and the spatial strategy. The Local Plan and associated spatial strategy is premised on the objective to encourage active and sustainable modes of transport and as explained at paragraph 2.68, to focus development in the most sustainable locations, in order to reduce the impact of travel in particular by private car.
- 4.19 Notwithstanding this, the Local Plan is advanced on the basis of allocations at Ludgershall, in favour of other development options at Andover. This is inconsistent with the evidence and the objectives of spatial strategy.
- 4.20 Within the *Interim SA*, in respect of transport and accessibility, a number of criteria are assessed including: site access; accessibility by sustainable modes of transport; proximity to key facilities including nursery; primary and secondary schools; healthcare and community facilities, as well as connections onto cycleways and footpath networks.
- 4.21 Based on these transport and accessibility objectives it is clear from the Council's own assessment that the proposed Ludgershall allocations perform the least positively out of all the site options which have been considered.

- 4.22 This supports the conclusion that in accessibility terms the Andover focused growth scenarios out perform options which propose to distribute growth away from Andover towards Ludgershall.
- 4.23 Both Land East of Ludgershall (NA7) and Land South of the A342 (NA8) are preferred options to Land at Finkley Down Farm within the Sustainability Appraisal, despite them scoring much lower on the SA Transport Objectives and having much lower potential to encourage the uptake of sustainable and active travel modes. This brings in to question the ranking of these sites within the Sustainability Appraisal.
- 4.24 The relative performance of site options against the SA Transport Objectives (2, 3 and 11) is shown below.

| Site                            | ++       | +        |
|---------------------------------|----------|----------|
| Land at Bere Hill               | 8        | 3        |
| <b>Finkley Down Farm</b>        | <b>8</b> | <b>1</b> |
| Land at Bere Hill Farm          | 4        | 2        |
| Land at Manor Farm              | 3        | 6        |
| Land East of Ludgershall        | 3        | 3        |
| Land South of A342, Ludgershall | 2        | 2        |

- 4.25 The relative performance of Andover sites, including land at Finkley Down Farm reinforces the conclusions of the SA that in accessibility terms, the Andover focused growth scenarios are the best performing option. To seek to implement a spatial strategy which is inconsistent with these findings raises serious concerns regarding the justification for such an approach.
- 4.26 In **transport** terms, the SA concludes that Scenarios 1 and 2 are the best performing growth scenarios, including significant development directed towards Ludgershall. We do not agree with this assessment.
- 4.27 Within the Sustainability Appraisal (paragraph 6.1.69) it states that:

*“traffic volumes along the A342 which serves Ludgershall show an increase in additional vehicle movements associated with growth scenarios 1, 2 and 3”.*

- 4.28 It is therefore acknowledged that additional vehicle movements and traffic volumes along the A342 will occur from development options at Ludgershall. The SA goes on to state that there are however:

*“no issues with capacity on this part of the network to cope with these additional movements”.*

- 4.29 This demonstrates that Test Valley is content to include less sustainable sites, as evidenced by the relative performance of the Ludgershall sites in accessibility terms,

which generate higher levels of traffic so long as there are no capacity issues. This is a flawed approach.

- 4.30 This is contradictory to a ‘*Decide and Provide*’ approach and environmental policies, which would favour alternative site options at Andover, such as Finkley Down Farm, with a much greater potential to increase the uptake of sustainable and active travel modes and lower dependence on the private car.
- 4.31 Such an approach would also be consistent with the Council’s own *Preliminary Transport Assessment*, which, at paragraph 7.3, recommends:

*“Travel demand assessment of the detailed development proposals, considering a range of transport scenarios, including a ‘Decide & Provide’ approach that takes into account emerging travel trends and the proposed transport strategy for the site”.*

- 4.32 In the context of the Andover growth scenarios and transport impacts, paragraph 6.167 of the *Interim Sustainability Appraisal* states:

*In Andover, the modelling indicates potential capacity pinchpoints including Enham Arch and Churchill Way West as a result of baseline background growth over the plan period to 2040. The growth scenarios including growth in Andover would place some additional pressure on these locations.* (Our emphasis)

- 4.33 It then goes on to state that:

*Manor Farm is a constant across all scenarios and would affect the capacity of both Churchill Way West and Enham Arch. Finkley Down Farm is included in scenarios 3 and 4 which would place additional pressure on the capacity of Enham Arch.* (Our emphasis)

- 4.34 The traffic modelling undertaken as part of this Regulation 18 consultation does not support the conclusions made in respect of Finkley Down Farm and specifically the transport impacts on the local highway network and Enham Arch. Within the SA (paragraph 6.166) it recognises that

*Overall, the transport modelling concludes that the network is able to accommodate additional traffic movements from the growth scenarios subject to appropriate mitigation to avoid significant effects.* (Our emphasis)

- 4.35 Through the strategic modelling results, as set out in the *Preliminary Transport Assessment* under Growth Option 1, which includes both Land at Manor Farm and Land at Finkley Down Farm is stated to have an impact along the A343 to the north of Andover, particularly around Enham Arch Retail Park in the future 2040 DS1 scenario.

- 4.36 This is consistent with the reference in the SA (paragraph 6.167) as quoted above. However, while there will be an impact at this location, the volume/capacity results are still below theoretical capacity at 91% in both the AM and PM peak periods without mitigation and so demonstrates that delivery of both sites is a realistic option.
- 4.37 Therefore, the evidence base does not support the conclusions that Scenarios 1 and 2 out perform the Andover Focused growth scenarios. The basis for this lacks justification as it is reliant upon conclusions associated with pinch points at Enham Arch and the local network, which the Council's own strategic modelling concludes would still operate within capacity.
- 4.38 In terms of '**housing delivery**' this is based purely on the overall quantum of development and the extent to which the growth scenarios will deliver the LHN and required buffer. Given that the site selection process and SA artificially reduces the quantum at Finkley Down Farm, it is evident that the capacity of individual sites is subject to some variance. In any event, the overall quantum provided by the four growth scenarios are all closely aligned and therefore little value can be taken against this criterion, in terms of providing a definitive basis upon which to make conclusions as to the most appropriate growth scenario.
- 4.39 Paragraph 7.2 and Table 10 of the of the SA conclude that scenario 1 performs the best in terms of **landscape** impact. This analysis is set out in paragraphs 6.151 to 6.158 of the SA, which also confirms that the main source of evidence in relation to landscape sensitivity is the 2023 Landscape Study.
- 4.40 In support of our representations a Landscape and Visual Overview of site allocations at Andover and Ludgershall has been prepared by *CSA Environmental* (see Appendix 2).
- 4.41 This assessment looks at the proposed housing allocations identified in the draft Local Plan on the periphery of Andover and Ludgershall and considers their ability to accommodate residential development, in landscape/townscape and visual terms. It also considers the land at Finkley Down Farm. Section 2 considers the Council's landscape evidence base; Section 3 sets out an assessment of the Areas; and within Section 4 we set out a comparative analysis of the 5 areas.
- 4.42 The Council's Landscape Sensitivity Assessment identified a number of landscape and visual sensitivities in respect of the proposed site allocations, as well as the site at Finkley Down Farm.
- 4.43 Based on the findings of the Council's landscape sensitivity assessment land at Manor Farm is assessed as being the most sensitive in landscape and visual terms of the options considered, with a high landscape sensitivity to potential development.
- 4.44 The sites at Ludgershall are assessed as being of moderate - high landscape sensitivity. The land at Bere Hill is assessed as moderate - high and moderate landscape sensitivity.

- 4.45 In contrast, the land at Finkley Farm, where development is proposed to be located within the south western part of the site, the Council's evidence assesses this area as being of moderate landscape sensitivity.
- 4.46 Based on the Council's own findings, the land at Finkley Down Farm therefore presents one of the least sensitive options in landscape and visual terms for strategic scale growth in the borough.
- 4.47 Through our representations we have considered the Council's own landscape evidence, and through our comparative assessment, it is clear that sites which are proposed to be allocated within this Reg 18 consultation, have higher landscape sensitivities than land at Finkley Down Farm.
- 4.48 Accordingly, the spatial distribution of growth is reliant upon conclusions relating to landscape sensitivities, which our analysis suggests does not accurately the true landscape context of proposed allocations. Moreover, it brings in to question the conclusions set out in the SA (paragraph 7.2) that growth scenario 1 performs the best in terms of landscape impact.
- 4.49 Overall, it is evident that the Council's own SA does not demonstrate that directing development to Ludgershall is the most appropriate option, particularly when this in favour of development options at Andover, specifically Finkley Down Farm.
- 4.50 The analysis set out in the *Spatial Strategy* Topic Paper (paragraph 6.9) that there is a 'strong argument' for focussing growth at Ludgershall, fails to recognise the challenges and constraints associated with providing a connected and accessible pattern of development at this location. This is not supported by the Council's own evidence and is inconsistent with the relative performance of alternative site options, specifically Finkley Down Farm.
- 4.51 The proposed allocations at Ludgershall run counter to the basic principles of the Spatial Strategy and as such, represents a flawed and unjustified approach.

## 5. Site Selection Process.

- 5.1 As noted within Section 2 of our representations, there is an identified residual requirement for the NTV sub area of 3,752 dwellings (including a 10% supply buffer). The majority of this requirement is proposed to be met at Andover, alongside allocations to the east of the Wiltshire market town of Ludgershall.
- 5.2 The *Site Selection* Topic Paper (February 2024) provides a summary of the 5 stages in that have been applied in the identification and selection of sites. Through this process a 'Preferred Pool' of sites for the NTV sub area is identified and this includes the following sites:

| Settlement    | Site name  | Quantum              |
|---------------|--|----------------------|
| Andover       | Land at Manor Farm                                       | 800 – 900            |
|               | Land at Bere Hill  | 300 – 600            |
|               | Land at Bere Hill and Bayliffs Bottom                    | 800                  |
|               | Land at Finkley Down                                     | 900                  |
|               | Land South of London Road                                | 90                   |
|               | Penton Corner (West of Andover)                          | 210                  |
|               | Land south of Forest Lane, Andover                       | 150                  |
| Ludgershall   | Land East of Ludgershall                                 | 350                  |
|               | Land south of A432 and east Shoddessen Lane, Ludgershall | 1,150                |
| <b>Totals</b> |  | <b>4,750 – 5,150</b> |

- 5.3 Given that the potential quantum available from the site options presented within the Preferred Pool of sites, not all sites will be required to meet the identified housing requirement.
- 5.4 The inclusion of Land at Finkley Down Farm is supported as a matter of principle however the 'Officer Assessed Capacity' (as referenced in Table 7 of the SA), of 900 dwellings is not supported.
- 5.5 Through our Landscapes submissions and previous representations to the Local Plan promoting development in the order of 1,500 dwellings, it is clear that land at Finkley Down Farm is capable of accommodating development significantly higher than the 'offer assessed capacity'. It is our position that Finkley Down Farm, with development focused to the south western part of the site, is capable of providing for circa 1,500 dwellings, in a manner which the Council's own evidence has assessed as being moderate landscape sensitivity.
- 5.6 Therefore, the consideration of Finkley Down Farm, in terms of growth scenarios and through the site selection process, should be based on a quantum which is consistent with that which has consistently been promoted, i.e. circa 1,500 dwellings.

- 5.7 Through the SA it is explained that with the Preferred Pool of sites established, the next stage is to define 'reasonable growth scenarios' (growth combinations) capable of delivering the identified housing requirement in a manner which aligns with the spatial strategy and strategy objectives of the plan.
- 5.8 Section 3 of our representation considers the growth scenarios in detail, and within this section we review the evidence base at it relates to the identification and assessment of sites which are included within the four growth scenarios.
- 5.9 In preparing these growth scenarios (site combinations) paragraph 5.122 of the *Interim SA* states that two sites are held 'constant', meaning they form part of every reasonable growth scenario as a fixed component of supply. These sites are as follows:

1. **Land south of London Road, Andover – 90 dwellings**
2. **Land at Bere Hill and Bayliffs Bottom, Andover – 800 dwellings.**

- 5.10 The justification for these two sites being held 'constant' is set out at paragraph 5.123 of the *Interim SA*, where it states:

*These sites are sequentially preferential in relation to alternative sites appraised through SA. They are sustainably located adjacent to the Tier 1 settlement of Andover, and are well connected to key services, facilities and public transport. The location of the sites and developable area avoids significant adverse effects on landscape, designated local gaps and ecology. These sites have also been appraised through transport modelling and are considered deliverable at this stage.*

- 5.11 It is considered to be a misrepresentation to state that only the sites south of London Road and Bere Hill/Bayliffs Bottom are held 'constant'. It is self-evident from the growth scenarios that Land at Manor Farm in particular, as well as Land at Bere Hill, are 'constant' site options as these feature across all four growth scenarios, albeit at varying levels of development.
- 5.12 This is in contrast to Land at Finkley Down Farm which is only considered within the Andover focused scenarios, scenarios 3 and 4. We have significant concerns with how Finkley Down Farm has been artificially excluded from consideration in the growth scenarios and the inconsistency of this approach when compared to other sites, such as Manor Farm.
- 5.13 Sites which are not held constant are classified as 'variable' within the SA and site selection process. Paragraph 5.127 of the *Interim SA* sets out in sequential order of preference these 'variable' sites, as follows:
1. Land at Manor Farm (800-900)
  2. Land at Bere Hill Farm (300 – 600)
  3. Land east of Ludgershall – 350 homes

4. Land south of A342 and east Shoddesden Lane, Ludgershall – 1,150 homes

**5. Land at Finkley Down Farm, Andover – 900 homes**

6. Land south of Forest Lane, Andover – 270 homes

7. Penton Corner (west of Andover) – 210 homes

5.14 Paragraphs 5.128 to 5.133 of the *Interim SA* seeks to explain the position of each of the seven variable sites. In respect of Finkley Down Farm, which is ranked 5<sup>th</sup>, paragraph 5.131 of the *Interim SA* states the following:

*Finkley Down Farm is located near to key facilities and infrastructure on the eastern edge of Andover with potential to integrate effectively with recent development on the settlement edge. The capacity of the site is limited by landscape impact. Outputs of transport modelling also identify constraints to the capacity of the local network including Enham Arch which would require mitigation if this site came forward in conjunction with Land at Manor Farm.* (Our emphasis)

5.15 This assessment recognises that Finkley Down Farm is well located to access a wide range of services and facilities at Andover. However, this assessment concludes that the overall capacity is limited by landscape impacts and that outputs from transport modelling indicate constraints to the local road network.

5.16 In respect of landscape impacts, the site selection process sets the quantum at 900 dwellings. Paragraph 6.155 of the *Interim SA* considers site options in terms of landscape matters and for Finkley Down Farm it states:

*Land at Finkley Down Road is a variable site option in an area of higher landscape sensitivity on the eastern settlement boundary. In order to avoid significant adverse effects development of this site would need to be restricted to less sensitive areas of the proposed site.* (Our emphasis)

5.17 This results in an ‘Officer Assessed Capacity’ of 900 dwellings (as described at Table 7 of the *Interim SA*). Whilst we do not support the conclusions on total capacity for Finkley Down Farm, given that the Council’s own assessment concludes that 900 dwellings is capable of being delivered **whilst avoiding significant adverse landscape impacts**, it is difficult to determine how landscape matters influence the ranking of this site.

5.18 As such, it is considered that the key driver behind the ranking of Finkley Down Farm comes from the conclusions in respect of transport related impacts.

5.19 *SA Appendix IV (Housing Site Appraisals)* assesses the site options against the SA objectives. For Finkley Down Farm the SA summary states:

*The site is adjacent to Augusta Park on the eastern edge of Andover in close proximity to essential services and amenities. This location has landscape sensitivity and relationship to the AONB but can be addressed by concentrating development to the west of the site and through landscaping. Transport impacts in this area have potential to cause **significant issues** on local network and Enham Arch. The southern site boundary abuts the railway line where noise attenuation measures are likely to be required. Site not proposed for allocation as less constrained and more sustainable alternatives in Andover. (Our emphasis)*

5.20 We do not agree with the conclusion that transport impacts, referred to as **significant issues**, associated within Finkley Down Farm provide an appropriate basis upon which to reject the sites as a potential allocation or reduce the relative performance of the growth scenarios which include Finkley Down Farm (Scenarios 3 and 4). The traffic modelling prepared as part of this Reg 18 consultation does not support this conclusion.

5.21 Within the *Preliminary Transport Assessment*, two growth options are assessed for traffic modelling purposes. Growth Option 1, includes both Manor Farm and Finkley Down Farm. Paragraph 6.166 states that:

*Overall, the transport modelling concludes that the network is able to accommodate additional traffic movements from the growth scenarios subject to appropriate mitigation to avoid significant effects. (Our emphasis)*

5.22 Growth Option 1 includes both Manor Farm and Finkley Down Farm and concludes that there will be an impact along the A343 to the north of Andover, particularly around Enham Arch Retail Park. Whilst acknowledging that there will be an impact at this location, the volume/capacity results are still below theoretical capacity at 91% in both the AM and PM peak periods **without** mitigation.

5.23 As such the Council's own modelling demonstrates that delivery of both Manor Farm **and** Finkley Down Farm is a realistic option. Furthermore, through the implementation of appropriate highway and sustainable transport mitigation measures, the impacts on the local highway network can be appropriately managed to support scales of development that would allow both Manor Farm and Finkley Down Farm to come forward, in terms of their respective identified quantum.

5.24 Through the Council's own modelling it clearly shows that the network is capable of accommodating the quantum of development identified at both Manor Farm and Finkley Down Farm, therefore the conclusions within the site selection process that Finkley Down Farm is likely to cause significant issues on the local network and Enham Arch is not supported by evidence.

5.25 The conclusions of the *Test Valley Local Plan 2040 Preliminary Transport Assessment* at paragraph 7.2.1 state:

*“Overall, the sites in close proximity to existing urban areas have good accessibility to key destinations and public transport services. The sites to the north of the borough situated around Andover have greater access to existing facilities and public transport”. (Our emphasis)*

5.26 This conclusion supports the sustainable and active transport potential of Land at Finkley Down Farm, which is located within walking and cycling distance of the facilities and amenities within Andover as well as existing bus provision and rail services available from Andover Railway Station.

5.27 As set out previously within our representations, the relative performance of site options against the SA Transport Objectives (2, 3 and 11) is shown below.

| Site                            | ++ | + |
|---------------------------------|----|---|
| Land at Bere Hill               | 8  | 3 |
| Finkley Down Farm               | 8  | 1 |
| Land at Bere Hill Farm          | 4  | 2 |
| Land at Manor Farm              | 3  | 6 |
| Land East of Ludgershall        | 3  | 3 |
| Land South of A342, Ludgershall | 2  | 2 |

5.28 As demonstrated above, Finkley Down Farm ranks second in all the sites when taking the transport related SA objectives into account.

5.29 Furthermore, the council’s assessment does not include the proposals set out in the Finkley Down indicative masterplan which would further enhance the sustainability of the site. Table 2.3 of our transport submissions show how rankings for Land at Finkley Down Farm would be elevated further to the highest ranked site in terms of the SA Objectives, based on the indicative proposals which form the previously masterplan submissions for this site.

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

5.31 The approach to the assessment of Finkley Down Farm raises serious questions as to the soundness of the site selection process and in particular, the way in which this site is appraised relative to other potential development locations.

5.32 Of the Andover site options we have particular concerns regarding how the Council has approached land at Manor Farm which, in our view, is unjustified and to the detriment of Finkley Down Farm.

- 5.33 Contrary to paragraph 5.122 of the SA, which refers to the 2 sites which are held 'constant', paragraph 6.168 of the *Interim SA* states:

*"Manor Farm is a constant across all scenarios and would affect the capacity of both Churchill Way West and Enham Arch. Finkley Down Farm is included in scenarios 3 and 4 which would place additional pressure on the capacity of Enham Arch."* (Our emphasis)

- 5.34 Reference to Manor Farm as a 'constant' is not supported by any specific evidence and directly contradicts with how the *Interim SA* and Site selection process refers to Manor Farm.
- 5.35 Paragraph 5.126 describes Manor Farm as being a 'variable' site option on the basis that *"development potential is varied at this stage."* This variation in development potential is based on the site providing either 800 or 900 homes. It is therefore carried forward as a 'constant' site within minimum capacity of 800 homes. In doing so, it has the same status across the four scenarios as Bere Hill/Bayliffs Bottom and Land South of London Road. Yet, it is not listed as a 'constant' site at paragraph 5.122 of the *Interim SA*.
- 5.36 The way in which Manor Farm is considered, as a constant across all four growth scenarios directly impacts upon Finkley Down Farm. Paragraph 5.131 of the *Interim SA* specifically refers to constraints related to the capacity of the local network in its consideration of Finkley Down Farm where it states that: *"Outputs of transport modelling also identify constraints to the capacity of the local network including Enham Arch which would require mitigation if this site came forward in conjunction with Land at Manor Farm."* (Our emphasis)
- 5.37 For reasons previously stated, even if such concerns were based on evidence, the manner in which they are applied to Finkley Down Farm and to all intent and purposes ignored in respect of Manor Farm, represents a significant failing of the site selection process.
- 5.38 For Manor Farm the SA (Appendix IV) summary states:

*The site is located with good accessibility to essential services and amenities and is well related to the settlement of Andover. Site access can be delivered from Saxon Way. There are landscape sensitivities and Ancient Woodland to the north of the site, the development proposes a woodland and Country Park to the north of the site as a landscape buffer to the AONB and the Ancient Woodland beyond. There is potential to locate development adjacent to the Andover settlement boundary of an appropriate scale to avoid adverse impacts on settlement distinction and maintain the local gap and also provide an appropriate buffer to listed buildings at Knights Enham.*

- 5.39 There is no reference within the SA summary as it relates to Manor Farm, regarding transport impacts and specifically the local network at Enham Arch.
- 5.40 The site selection process appears to ignore, or not understand, that traffic from the proposed allocation at Manor Farm would use the same highway network around Enham Arch as Finkley Down Farm. Yet concerns related to potential impact on the local road network are not applied to Manor Farm.
- 5.41 None of the four growth scenarios include an option whereby Finkley Down Farm is considered as an alternative to Manor Farm. Where Finkley Down Farm does form part of a growth scenario this site is treated as an *addition* to Manor Farm, owing to the fact that Manor Farm is a 'constant' site. There does not appear to be any logical reasons for not considering, as a reasonable alternative growth scenario, the exclusion of Manor Farm.
- 5.42 It is clear from our review of the evidence base that Finkley Down Farm is unfairly considered across the growth scenarios as being in addition to Manor Farm.
- 5.43 Manor Farm is identified as the top site in the sequential order of preference for the 'variable' site options, as set out at paragraph 5.127 of the *Interim SA*. However, the evidence base, specifically the SA does not support this conclusion. Moreover, when the SA is reviewed, it does not support the significant divergence in the ranking of Manor Farm (1<sup>st</sup>) and Finkley Down Farm (5<sup>th</sup>).
- 5.44 This is demonstrated when the SA Appraisal for both sites are set side by side.

| SA Objective   | Criteria  | Finkley Down Farm | Land at Manor Farm (173) |
|--|---|-------------------|--------------------------|
| Objective 1: Ensure everyone has the opportunity to live in an appropriate and affordable home that meets their needs  | A) Is the site able to address a particular housing need?                                   | ?                 | ?                        |
| Objective 2: Ensure the local economy is thriving with high and stable levels of growth, whilst supporting productivity and the promotion of a diverse economy, with the availability of a skilled workforce | A) Is the site likely to increase future economic and employment opportunities?             | 0                 | +                        |
|  | B) Is the site accessible to a strategic employment site by sustainable modes of transport? | ++                | ++                       |
|  | C) Is there connection to high quality broadband?   | ++                | +                        |
|  | D) Is the site accessible to Andover or Romsey Town Centres?                                | ++                | +                        |
| Objective 3: Maintain and improve access to services, facilities, and  | A) Is the site accessible to early years education provision?                               | +/-               | +/-                      |

|   |  |     |     |
|---|--|-----|-----|
| other infrastructure, whilst improving the efficiency and integration of transport networks and the availability and utilisation of sustainable modes of travel | B) Is the site accessible to a Primary School?   | ++  | +   |
|   | C) Is the site accessible to a Secondary School?   | +/- | +/- |
|   | D) Is the site accessible to a Convenience Store including at a Local/District/Town Centre?  | ++  | +/- |
|   | E) Is the site accessible to a Primary healthcare facility (GP, Health Centre or Hospital)?<br>[this does not include dentist provision]   | +/- | +/- |
|   | F) Is the site accessible to a community facility?   | ++  | ++  |
|   | G) Can the site readily connect to cycleways and footpath networks?  | ++  | ++  |
|   | H) Is the site accessible to a bus or rail service?  | ++  | +   |
|   | I) Is the site able to connect to the highway?   | +   | -   |
| Objective 4: Encourage the efficient use of land and conserve soil resources.   | A) Is the site on previously developed land?   | -   | -   |
|   | B) Will development result in the loss of best or most versatile agricultural land?  | +/- | --  |
|   | C) Does the site fall within a mineral and waste consultation area?  | +/- | +/- |
|   | D) Does it include a former landfill site?   | 0   | 0   |
| Objective 5: Conserve and, where possible, enhance the water environment and ensure the sustainable management of water resources.                              | A) The site within a groundwater source protection zone?   | +/- | +/- |
| Objective 6: Seek to avoid and reduce vulnerability to the risk of flooding and the resulting detrimental effects to the public, economy and environment        | A) Does the site contain areas at risk of or potential to be susceptible to flooding, either now or in the future?   | +   | +/- |
| Objective 7: Maintain and, where possible, enhance air quality  | A) Would development of the site lead to concerns on air quality in light of national air quality objective levels?  | 0   | 0   |
| Objective 8: Conserve and, where possible, enhance the Borough's landscape, townscapes and settlement character   | A) Would development affect landscape character and protected landscapes?  | +/- | +/- |
|   | B) Does the site relate well to the existing settlement and to the immediate context/surrounding area?   | +/- | +/- |
|   | C) Does the site have the potential to impact the distinction between settlements, or lead to a risk of physical or visual coalescence, where this is relevant to settlement identity? | -   | -   |
| Objective 9: Conserve and, where possible, enhance the historic environment and the significance of heritage assets   | A) Is development likely to conserve or enhance the significance of heritage assets, their setting, and the wider historic environment?  | -   | --  |
|   | B) Is development likely to conserve or enhance the significance of sites of archaeological interest?  | ?   | ?   |

|   |   |     |     |
|---|---|-----|-----|
| Objective 10: Conserve and, where possible, enhance biodiversity and habitat connectivity | A) Will the development conserve and enhance protected sites (internationally, nationally and locally) in line with relevant legislation and national policy? | -   | -   |
|   | B) Will the development conserve habitats and species, achieve net gains for biodiversity and enhance the local ecological network?                           | ++  | ++  |
|   | C) Would development conserve and extend quality local green infrastructure provision?  | +   | +   |
|   | D) Would development affect protected and unprotected trees?  | -   | +/- |
| Objective 11: Support the delivery of climate change mitigation and adaptation measures   | Will the site contribute towards reducing our impact on the climate?  | +/- | +   |
| Objective 12: Seek to maintain and improve the health and wellbeing of the population     | A) Is the site accessible to open space?  | +   | -   |
|   | B) Is the site accessible to sport facilities?  | -   | -   |
|   | C) Would development support the retention and / or enhancement of access and rights of way to the countryside?   | +/- | +   |
|   | D) Would development of the site be able to minimise the risk of exposing people to inappropriate levels of noise pollution?                                  | -   | +   |

5.45 Reviewing the SA scoring for Manor Farm and Finkley Down Farm it is evident that Finkley Down Farm scores more positively against 10 SA objective criteria than Manor Farm, with Manor Farm scoring better against 5 SA criteria.

5.46 Where Manor Farm performs better against the SA objective criteria, the differences are marginal and in some cases, the approach taken in the SA appears inconsistent, as summarised below.

| Table 2   |   |   |
|---|---|---|
|   | Finkley Down Farm   | Manor Farm  |
| <b>Objective 2: Local Economy</b>   |   |   |
| A) Is the site likely to increase future economic and employment opportunities. | 0<br>(No effect)  | +   |
|   | No employment development has been included within the submission and the indicative master planning. | The site submission refers to the potential for a local centre and employment area that could provide employment opportunities. |

Finkley Down Farm is extremely well located to access existing employment provision, including the Walworth Industrial Area. The site has been consistently promoted for a range of uses alongside residential, including a local centre, primary school. As such Finkley Down Farm can provide employment opportunities on site and access to existing employment locations, in doing so supporting key existing employment areas. To conclude through the SA that Finkley Down Farm will have 'no effect' lacks credibility.

#### Objective 10 Biodiversity

| D) Would development affect protected and unprotected trees | -<br>(Negative)  | +/-<br>(Mixed Performance)   |
|---|--|--|
|   | <p>There are some TPO trees located along the south western corner of the site adjacent to Finkley Down Farm. Confirmation is required regarding retaining these trees in the indicative masterplanning.</p> <p>There are unprotected trees located around the site boundary with greater tree cover along the southern boundary adjacent to the railway. There are also some unprotected trees along the hedgerow boundary through the centre of the site. A tree survey will be required to determine the impact on trees.</p> | <p>There are no Tree Preservation Orders affecting the site, however there are existing trees on field boundaries within the site which may need to be retained as part of any future development.</p> <p>There is an area of Ancient Woodland within the northern site boundary. Proposed development is located to the south of the site within acceptable buffer distances.</p> |

It is not clear why Finkley Down Farm scores more negatively than Manor Farm against this objective. The SA assessment accepts that impact on existing trees (protected or not) will be determined through appropriate tree surveys. The SA assessment appears to ignore the fact that the scale of this site can provide opportunities to avoid harm to existing trees. However, in the context of Manor Farm and its proximity to an Ancient Woodland, the SA assessment adopts a less stringent approach and accepts the ability of such features to be protected through the masterplanning stage. There is no rationale basis upon which to justify a more negative score for Finkley Down Farm against this SA Objective.

#### Objective 11: Climate Change

| Will the site contribute towards reducing our impact on the climate? | +/-<br>(Mixed Performance)   | +<br>(Positive)  |
|--|--|--|
|  | <p>The site is located in an area with good accessibility through a frequent bus service to essential services and amenities in Andover. Development of the site would involve the loss of Grade 3a agricultural land (approximately 40% of site). Part of the site is also within a</p> | <p>The site is located adjacent to Andover's northern site boundary with good accessibility to essential services and amenities. Development of the site would involve the loss of the best or most versatile agricultural land.</p> |

|   |  |   |
|---|--|---|
|   | Grade 3 Groundwater source protection zone. The site is relatively unconstrained with potential for significant net gains in BNG, green infrastructure and to establish links to local ecological networks.  | Development of the site is unlikely to be significantly affected by floodrisk. There is potential to locate development adjacent to the Andover settlement boundary of an appropriate scale to avoid adverse impacts on protected habitats and species.   |
| It is unclear why the SA specifically references and quantifies the loss Grade 3a in the context of Finkley Down Farm, but not for Manor Farm where a significant proportion of the land is Grade 3a. Moreover, Finkley Down Farm outperforms Manor Farm against SA Objective 3 (accessibility) and therefore provides greater opportunities for reducing car dependency which is a key component of the climate change strategy. |  |   |
| <b>Objective 12 Health &amp; Wellbeing</b>  |  |   |
| C) Would development support the retention and / or enhancement of access and rights of way to the countryside?   | <b>+/-<br/>(Mixed Performance)</b>   | <b>+</b><br><b>(Positive)</b>   |
|   | HCC public rights of way are located within the site boundary to the western edge. It appears that an existing HCC right of way would need to be realigned in relation to the submitted indicative masterplanning.   | The indicative masterplanning provides the opportunity to enhance access to the countryside and rights of way.  |
| Public Rights of Way are also a feature of the Manor Farm Site, yet the SA approaches these features in completely different ways, treating them more negatively within the assessment of Finkley Down Farm, but recognising opportunities for enhancements within the context of Manor Farm. The approach is inconsistent and raises concerns as to the fairness of how site options are being considered.                       |  |   |
| D) Would development of the site be able to minimise the risk of exposing people to inappropriate levels of noise pollution?  | <b>-<br/>(Negative)</b>  | <b>+</b><br><b>(Positive)</b>   |
|   | There is an existing railway line that abuts the site's southern boundary. The site promoter has identified that acoustic surveys have been undertaken, which demonstrate that potential noise impacts would not represent a significant constraint to development. In any case, it is considered that any potential impacts can be mitigated through appropriate design. (This needs to be reviewed by Environmental Health). | The A343 Newbury Road runs to the south of the site and along the eastern boundary. Part of this road is within the DEFRA noise buffer area. Although the site is outside the noise buffer area a noise impact assessment may be required to determine level of impact on the proposed development. |

|  |   |  |
|--|---|--|
|  | There is also a large employment area at Walworth Business Park just to the south of the railway line which could be a source of noise affecting residential amenity. |  |
| In both cases, the SA recognises that sources of noise need to be considered and any future development supported by appropriate noise assessments. Therefore, there is no rational basis for the SA to consider noise conditions as a negative for Finkley Down Farm, whilst recognises potential noise issues at Manor Farm and the need for noise assessments, but concluding that Manor Farm scores positive against this SA objective. This represents an inconsistent and flawed approach. |   |  |

- 5.47 The SA process represents a major evidence base for the assessment sites. What our comparison of Finkley Down Farm and Manor Farm demonstrates is that Finkley Down Farm performs better overall against the SA objectives when compared to Manor Farm. Where the SA scores Manor Farm more positively against specific Objectives there is inconsistency in how the SA approaches each site.
- 5.48 The comparison between these two sites in terms of their performance against the SA objectives does not result in such divergence that would support the Council's ranking of Finkley Down Farm as 5<sup>th</sup>, compared to the top ranking of Manor Farm in the sequential preference of sites.
- 5.49 This is of particular relevance given the site selection process and the assessment of reasonable growth scenarios includes Manor Farm under every reasonable scenario, whilst excluding Finkley Down Farm the Andover/Ludgershall scenarios (scenarios 1 and 2).
- 5.50 There is no logical rationale to explain why Finkley Down Farm, as an alternative to Manor Farm does not form part of a reasonable growth scenario which includes land at Ludgershall. The comparative performance of Finkley Down Farm against Manor Farm, does not support its exclusion from forming part of a wider range of growth scenarios.
- 5.51 Figure 5 of the *Site Selection Topic Paper* set out a summary of the preferred sites suitability for the NTV sub-area. There is no summary within the *Site Selection Topic Paper* to explain why other sites, including Finkley Down Farm, were rejected. For Manor Farm, Figure 5 states:

*This site is sustainably located adjacent to Andover and is well connected to services, facilities at Saxon Way and Charlton Village and connections to public transport. Development can be appropriately located outside of sensitive landscape areas, the local gap, and avoiding adverse impacts on heritage assets when focussed towards Saxon Way. The site offers the opportunity to deliver significant open space towards the north of the site. There is a small corridor*

*surface water flooding on the site. It is proposed the site has a reduced boundary to that promoted and focusses along Saxon Way.*

- 5.52 Within the *Interim SA* paragraphs 5.128 to 5.133 it summarises the basis of the variable sites and their position within the sequential order of preference. For Manor Farm, ranked in 1<sup>st</sup> position, paragraph 5.128 of the *Interim SA* states:

*Land at Manor Farm is well connected to services and facilities on the northern Andover settlement edge and performs well through the SA. The site has housing potential of approximately 800 – 900 dwellings which can be accommodated in the southern part of the site which is less constrained.*

- 5.53 For Finkley Down Farm, paragraph 5.131 of the *Interim SA* states:

*Finkley Down Farm is located near to key facilities and infrastructure on the eastern edge of Andover with potential to integrate effectively with recent development on the settlement edge. The capacity of the site is limited by landscape impact. Outputs of transport modelling also identify constraints to the capacity of the local network including Enham Arch which would require mitigation if this site came forward in conjunction with Land at Manor Farm.* (Our emphasis)

- 5.54 Once again Finkley Down Farm is only considered through the SA as a site in addition to Manor Farm, yet we have shown in our review of the SA, that Finkley Down Farm outperforms Manor Farm. Reference to modelling and capacity issues on the local network, including Enham Arch is only applied as a constraint in the context of Finkley Down Farm and on the basis that it is in addition to development at Manor Farm.
- 5.55 We do not agree with the conclusion that transport impacts associated within Finkley Down Farm provide an appropriate basis upon which to reject the sites as a potential allocation. The traffic modelling prepared as part of this Reg 18 consultation does not support this conclusion.
- 5.56 We have demonstrated within these representations that the sequential order of preference, which ranks Finkley Down Farm as 5<sup>th</sup>, with Manor Farm the top performing variable site, is not supported by the Council's own assessment within the *Interim Sustainability Appraisal*.
- 5.57 Furthermore, the main driver for rejecting Finkley Down Farm, related to transport impacts is not supported by the Council's own evidence, which clearly shows that even in combination with Manor Farm, and in advance of any mitigation and sustainable transport measures, the local network has capacity.

## Ludgershall Sites

5.58 Paragraph 6.9 of the *Spatial Strategy* Topic Paper states that:

*In relation to the northern HMA, there is a strong argument for focusing growth in Andover and adjacent to the Wiltshire market town of Ludgershall where there is good access to services, facilities, employment and public transport. Ludgershall, Wiltshire is not in the Test Valley settlement hierarchy but is designated a Tier 2 market town in the Wiltshire Local Plan. (Our emphasis).*

- 5.59 We do not agree with this conclusion, and this is not supported by the Council's own evidence. The consequence of this being that a significant proportion of planned development is being diverted away from Andover, the most sustainable settlement in the NTV sub area, in favour of a development option that undermines the main objectives and approach defined in the *Spatial Strategy*.
- 5.60 Paragraph 2.68 of the Reg 18 (Stage 2) consultation document specifically refers to the 20-minute neighbourhood principles as an approach that can help to reduce the need for travel and the impacts associated with this. Which, in turn forms a key component of the *Spatial Strategy*.
- 5.61 Within our transport submissions, walking and cycling catchments for Ludgershall have been prepared, set alongside similar catchments for Land at Finkley Down Farm. These show that the 20 minute walking catchments for the sites at Ludgershall only include Ludgershall, whereas the Finkley Down Farm walking catchment includes facilities and amenities in Andover and the Walworth Business Park to the south of the site.
- 5.62 A 30-minute cycle from the sites at Ludgershall only reaches the outskirts of Andover, whereas the entirety of Andover, including the railway station, are well within a 30-minute cycle of Finkley Down Farm.
- 5.63 The walking and cycling catchments presented within our representations demonstrate how Finkley Down Farm is better located to access a larger range of services and facilities, when compared to the proposed Ludgershall allocations. We do not agree with the statement at paragraph 6.9 of the *Spatial Strategy* Topic Paper and we note that this does not consider the range of services and facilities available at Ludgershall, nor does it reflect the challenges faced by the proposed allocations in terms of providing suitable and sustainable access to those services and facilities.
- 5.64 Within the recent Wiltshire Local Plan Regulation 19 consultation it describes Ludgershall town centre as follows:

*The town centre itself is modest, with a focus on day-to-day top-up food shopping and services. Ludgershall benefits from its complementary role with Tidworth, where main food shopping options are more readily available.*<sup>1</sup> (Our emphasis)

- 5.65 The level of service and facilities at Ludgershall is clearly limited, in stark contrast to those within the catchments of Finkley Down Farm. The 'modest' nature of Ludgershall town centre is further referenced within the Wiltshire Local Plan Sustainability Appraisal where it states:

*Ludgershall is not considered to be self-sustainable and any additional housing, without the mitigation of additional employment and retail opportunities would be likely to result in significant car dominated mode share.*<sup>2</sup> (Our emphasis)

- 5.66 Through the Wiltshire Council Sustainability Appraisal it is clearly recognised that significant development can only reduce car movements if it is supported by a range of services and facilities. Such an approach, in favour of alternative development options at Finkley Down Farm, where development will benefit from an existing and significantly higher level of services and facilities, brings in to question the appropriateness of directing significant levels of growth to a lower tier settlement with a substantially lower level of services and facilities.
- 5.67 The proposed allocations at Ludgershall, specifically Land to the south west of Ludgershall for 1,150 homes (draft Policy NA8), also have significant constraints that impact on the ability of this development area to provide for suitable access and connectivity to local services and the public transport network, the latter being available on the A432 (Andover Road).
- 5.68 The Wiltshire Council *Planning for Tidworth and Ludgershall* background paper considered the allocation to the east of Ludgershall within their administrative boundary and noted that:

*A constraint with the site is the position of the MoD operated railway line which extends east-west through the centre of Ludgershall, representing a barrier to connectivity between the north and south of the settlement. While there are crossing points available, these are limited, and development of this site should look to explore alternative ways to improve connectivity.*<sup>3</sup> (Our emphasis)

- 5.69 We agree with the assessment in the Wiltshire Local Plan evidence base that the MoD railway line represents a barrier to connectivity, we are concerned that the significance of this constraint is not given sufficient prevalence in the site selection process and the reliance on the Ludgershall sites as a key component of the Spatial Strategy.

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

<sup>2</sup> Wiltshire Regulation Local Plan: Sustainability Appraisal SA Annex 2.12 - Page 55

<sup>3</sup> Wiltshire Council Local Plan Reg 19: *Planning for Tidworth and Ludgershall* – Paragraph 57

- 5.70 Within the proposed policy NA8, criteria e) requires access to the development *via a bridge over the railway line to the A342 to the north*. The supporting text to NA8 (paragraph 4.103) states:

*Site access is proposed from the A342 (Andover Road) and a bridge over the railway which is used by the Ministry of Defence. The site that is proposed in Wiltshire is also likely to need access via the railway bridge. This is a significant piece of infrastructure and further discussions will be required with Hampshire County Council and Wiltshire Council.*

- 5.71 We agree that the delivery of the rail bridge is a significant piece of infrastructure, but it should also be recognised that the absence of such infrastructure represents a major constraint which impacts directly on the suitability of this development area to support sustainable patterns of development, which is the cornerstone of the Spatial Strategy.
- 5.72 This Reg 18 consultation is silent on the genuine risks presented by the need to cross the railway in terms of the deliverability of the NA8 allocation. This relates to viability, and the real risk of a ransom situation, alongside the significant costs of delivering this major piece of infrastructure. Both pose risks to overall deliverability but also present challenges to the delivery of affordable housing and other essential community infrastructure due to the high, and so far uncoded, infrastructure requirements.
- 5.73 Furthermore, the feasibility of providing a rail crossing has not been assessed at this time and therefore there are genuine concerns given the engineering requirements and physical space available, such that irrespective of viability concerns, the feasibility of this crossing raises serious concerns as to whether this site is capable of being served by an appropriate access.
- 5.74 Within the SA (Appendix IV) in response to Objective 3(l); *Is there site able to connect to the highway*, the site scores 'negative' with the assessment stating:

*It would connect to Andover Road through this part of the site which is currently a car breakers yard and cross over the railway line (currently only for MoD use). It is also an A road. This is clearly a constraint.*

- 5.75 Through the Council's own analysis, it is acknowledged that this connection is reliant on third party land, but it downplays or worse still, ignores the significant challenges faced in delivering this major piece of infrastructure. The 'negative' score in the SA, does not, in our view, accurately reflect the significance of this constraint and the challenges in terms of delivery.
- 5.76 In terms of whether or not this site is accessible to a bus route and its accessibility to Andover, the site scores **strongly positive** and **positive** respectively. This is on the basis that the site is within 400m of a bus stop. This does not accurately reflect the fact that

the site is severed from the A342 (Andover Road) by the railway line, with a single underpass ped/cycle route via Shoddensden lane. A significant portion of this proposed allocation lies beyond 400m of an existing bus service, even as the crow flies.

- 5.77 Crossing of the railway line remains a significant constraint which directly impacts on the connectivity of this site to public transport routes, a fact which is not accurately acknowledged within the *Interim Sustainability Appraisal*.
- 5.78 Within the Wiltshire Council Regulation 19 Sustainability Appraisal assessment of their proposed strategic allocation, the assessment under SA Objective 3 (Making efficient use of existing transport infrastructure) it states:

*The Active 8 service is currently only accessible from the A342 and whilst elements of the site may access this service within an appropriate 400m walking distance from Shoddensden Lane, the vast majority of the site would be beyond reasonable walking distance. Given the scale of the site, it is necessary for a new access to be provided across the railway line to the east....*

*Without bus friendly connections to both the west and east of the site, the site could not be considered sustainably connected by public transport.*<sup>4</sup> (Our emphasis)

- 5.79 It is a misrepresentation within the TVBC *Interim Sustainability Assessment* to attribute **strongly positive** and **positive** scoring in respect of accessibility and public transport as this has no regard to the major constraint presented the railway line. The assessment set out in the Wiltshire Council Sustainability Appraisal is correct and the TVBC local plan should recognise that without appropriate public transport connections, which are dependent upon major infrastructure constraints being addressed, the proposed Ludgershall allocations do not provide for sustainable patterns of development that are consistent with the overarching objectives of the Spatial Strategy.
- 5.80 The extent to which the railway line is a constraint and impacts on the sustainability and connectivity of land to the south of the rail line, is accurately assessed within the Wiltshire Regulation 19 Sustainability Appraisal, where it considers rail options at Ludgershall, including enhancements, and states:

*Rail: The continued or enhanced rail line presents a barrier to the new site integrating with the existing community, preventing it from being considered a sustainable addition to Ludgershall. Despite the significant merits that an operating high frequency rail line could add to Ludgershall, this actually represents a significant barrier to the sustainability of the site, prejudicing sufficient active*

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<sup>4</sup> Wiltshire Regulation Local Plan: Sustainability Appraisal SA Annex 2.12 - Page 54

travel links and reducing opportunities for the site and remaining town to be served by a contiguous bus service provision<sup>5</sup>. (Our emphasis)

- 5.81 Even in the context of significant development coming forward to the east of Ludgershall, the Wiltshire SA continues to raise concerns as to the implications for the existing community, this is set out in the SA where it states:

The most significant constraint to the site is presented by the existing railway line, which presents a barrier to sustainable transport between the site and the town and would be likely to result in reduced bus access for the existing community should the development be brought forward. The railway line also presents a barrier to achieving satisfactory vehicular access.<sup>6</sup> (Our emphasis)

- 5.82 Land at Ludgershall is listed within the SA as being sequentially preferred over land at Finkley Farm, despite the clear and obvious disparities in terms of the accessibility of the Ludgershall sites when compared to Finkley Down Farm.

- 5.83 We set out below the SA assessment of Finkley Down Farm relative to the Ludgershall sites.

| SA Objective  | Criteria  | Finkley Down Farm | Land East Ludgershall (61) | Land South East Ludgershall (324) |
|---|---|-------------------|----------------------------|-----------------------------------|
| Objective 1: Ensure everyone has the opportunity to live in an appropriate and affordable home that meets their needs   | A) Is the site able to address a particular housing need?                                   | ?                 | ?                          | +                                 |
| Objective 2: Ensure the local economy is thriving with high and stable levels of growth, whilst supporting productivity and the promotion of a diverse economy, with the availability of a skilled workforce                          | A) Is the site likely to increase future economic and employment opportunities?             | 0                 | 0                          | 0                                 |
|   | B) Is the site accessible to a strategic employment site by sustainable modes of transport? | ++                | +                          | +                                 |
|   | C) Is there connection to high quality broadband?   | ++                | ++                         | ++                                |
|   | D) Is the site accessible to Andover or Romsey Town Centres?                                | ++                | +                          | +                                 |
| Objective 3: Maintain and improve access to services, facilities, and other infrastructure, whilst improving the efficiency and integration of transport networks and the availability and utilisation of sustainable modes of travel | A) Is the site accessible to early years education provision?                               | +/-               | +/-                        | +/-                               |
|   | B) Is the site accessible to a Primary School?  | ++                | +/-                        | +/-                               |
|   | C) Is the site accessible to a Secondary School?  | +/-               | -                          | -                                 |
|   | D) Is the site accessible to a Convenience Store including at a Local/District/Town Centre? | ++                | +/-                        | +/-                               |

<sup>5</sup> Wiltshire Regulation Local Plan: Sustainability Appraisal SA Annex 2.12 - Page 54-55

<sup>6</sup> Wiltshire Regulation Local Plan: Sustainability Appraisal SA Annex 2.12 - Page 55

|  |  |     |     |     |
|--|--|-----|-----|-----|
|  | E) Is the site accessible to a Primary healthcare facility (GP, Health Centre or Hospital)?  | +/- | +/- | +/- |
|  | F) Is the site accessible to a community facility?   | ++  | +/- | +/- |
|  | G) Can the site readily connect to cycleways and footpath networks?  | ++  | ++  | -   |
|  | H) Is the site accessible to a bus or rail service?  | ++  | ++  | ++  |
|  | I) Is the site able to connect to the highway?   | +   | +   | -   |
| Objective 4: Encourage the efficient use of land and conserve soil resources.  | A) Is the site on previously developed land?   | -   | -   | -   |
|  | B) Will development result in the loss of best or most versatile agricultural land?  | +/- | +   | +   |
|  | C) Does the site fall within a mineral and waste consultation area?  | +/- | 0   | 0   |
|  | D) Does it include a former landfill site?   | 0   | 0   | 0   |
| Objective 5: Conserve and, where possible, enhance the water environment and ensure the sustainable management of water resources.                       | A) The site within a groundwater source protection zone?   | +/- | -   | +/- |
| Objective 6: Seek to avoid and reduce vulnerability to the risk of flooding and the resulting detrimental effects to the public, economy and environment | A) Does the site contain areas at risk of or potential to be susceptible to flooding, either now or in the future?   | +   | ++  | +/- |
| Objective 7: Maintain and, where possible, enhance air quality   | A) Would development of the site lead to concerns on air quality in light of national air quality objective levels?  | 0   | 0   | 0   |
| Objective 8: Conserve and, where possible, enhance the Borough's landscape, townscapes and settlement character  | A) Would development affect landscape character and protected landscapes?  | +/- | -   | +/- |
|  | B) Does the site relate well to the existing settlement and to the immediate context/surrounding area?   | +/- | +   | +/- |
|  | C) Does the site have the potential to impact the distinction between settlements, or lead to a risk of physical or visual coalescence, where this is relevant to settlement identity? | -   | 0   | -   |
| Objective 9: Conserve and, where possible, enhance the historic environment and the significance of heritage assets                                      | A) Is development likely to conserve or enhance the significance of heritage assets, their setting, and the wider historic environment?  | -   | 0   | 0   |
|  | B) Is development likely to conserve or enhance the significance of sites of archaeological interest?  | ?   | +   | +   |

|   |   |     |     |     |
|---|---|-----|-----|-----|
| Objective 10: Conserve and, where possible, enhance biodiversity and habitat connectivity | A) Will the development conserve and enhance protected sites (internationally, nationally and locally) in line with relevant legislation and national policy? | -   | 0   | -   |
|   | B) Will the development conserve habitats and species, achieve net gains for biodiversity and enhance the local ecological network?                           | ++  | +   | -   |
|   | C) Would development conserve and extend quality local green infrastructure provision?  | +   | +   | -   |
|   | D) Would development affect protected and unprotected trees?  | -   | +/- | +/- |
| Objective 11: Support the delivery of climate change mitigation and adaptation measures   | Will the site contribute towards reducing our impact on the climate?  | +/- | +/- | +/- |
| Objective 12: Seek to maintain and improve the health and wellbeing of the population     | A) Is the site accessible to open space?  | +   | ++  | ++  |
|   | B) Is the site accessible to sport facilities?  | -   | -   | -   |
|   | C) Would development support the retention and / or enhancement of access and rights of way to the countryside?   | +/- | +   | +/- |
|   | D) Would development of the site be able to minimise the risk of exposing people to inappropriate levels of noise pollution?                                  | -   | -   | -   |

5.84 Finkley Down Farm out performs the Ludgershall sites in respect of SA Objective 2 (economy), Objective 3 (accessibility); Objective 10 (biodiversity). It is not clear why Finkley Down Farm scores 'uncertain' against Objective 1 (Housing), whereas Land south east of Ludgershall scores 'positive'. All development proposals will be required to provide an appropriate mix of house types, sizes and tenures, therefore 'positive' scores should be recorded across all site options.

5.85 With the remaining SA objectives, there is little in the analysis to suggest that the Ludgershall sites perform noticeably more positively than land at Finkley Down Farm and based on our review of the SA, it is more accurate to conclude that Finkley Down Farm performs better than the proposed sites at Ludgershall.

5.86 Paragraph 5.130 of the *Interim Sustainability Appraisal* only refers to the Ludgershall sites as being sequentially preferential to land south of Forest lane (site 6) and Penton Corner (Site 7), and then goes on to state that the Ludgershall sites are less constrained and perform better through the SA in comparison to the remaining Andover sites. The lack of references to Finkley Down Farm (Site 5) at paragraph 5.130 raises some questions and creates a lack of clarity as to the Council's position in terms of the relative SA performance of the Ludgershall sites compared with Finkley Down Farm.

- 5.87 The SA is clear in the presentation of the sequentially preferential sites which places Ludgershall sites above Finkley Down Farm, yet there is little by way of analysis within the SA to demonstrate why this is the case.
- 5.88 The statement within the SA (paragraph 5.130) that the Ludgershall sites are less constrained and perform better through the SA can evidently not be accurate in respect of any comparison with Finkley Down Farm. The SA simply does not support any such conclusion.
- 5.89 We have set out within our representations our concerns related to the preferred growth option which includes allocations at Ludgershall, and through this section of our representations, we have sought to demonstrate that the site selection process does not support the identification of Ludgershall sites as sequentially preferential to Finkley Down Farm.
- 5.90 The site selection process does not support the proposed allocations and of greater concern is the approach to Finkley Down Farm which is considered to be inconsistent, inaccurate and artificially negative, in order to justify the allocations proposed within this Reg 18 local plan consultation.

## 6. Conclusions & Changes Sought

- 6.1 On behalf of our client, Taylor Wimpey UK Ltd, we are pleased to provide our comments in response to the Test Valley Local Plan 2040 Regulation 18 consultation.
- 6.2 The overarching strategic approach, specifically in respect of the continued split of the Borough into the two distinct Housing Market Areas (HMAs); the identified Local Housing Need (LHN); and the continued focus within the proposed Spatial Strategy to direct growth towards the Tier 1 settlements of Andover and Romsey, is supported as a matter of principle.
- 6.3 Land at Finkley Down Farm is listed within the 'Preferred Pool' of site options within the NTV HMA but is not identified as a proposed site allocation, being rejected in favour of alternatives at Andover and at the edge of the Wiltshire market town of Ludgershall.
- 6.4 The inclusion of Land at Finkley Down Farm with the preferred pool of sites is supported as a matter of principle however the 'Officer Assessed Capacity' (as referenced in Table 7 of the SA), of 900 dwellings is not supported.
- 6.5 Our Landscape submissions and previous representations to the Local Plan demonstrate that this site is capable of accommodating development in the order of 1,500 dwellings, in a manner which the Council's own evidence has assessed as being moderate landscape sensitivity.
- 6.6 Therefore, the consideration of Finkley Down Farm, in terms of growth scenarios and through the site selection process, should be based on a quantum which is consistent with that which has consistently been promoted, i.e. circa 1,500 dwellings.
- 6.7 Moreover, our representations have considered the Council's own landscape evidence, and through our comparative assessment, it is clear that sites which are proposed to be allocated within this Reg 18 consultation, have higher landscape sensitivities than land at Finkley Down Farm.
- 6.8 For the NTV sub area, the spatial distribution of development is informed by the assessment of reasonable growth scenarios which includes site combinations based on those sites identified through the site selection process.
- 6.9 We do not support the spatial strategy in terms of directing significant scales of development to Ludgershall. This is not sound as a matter of principle, in terms of aligning with the objectives of the Local Plan, specifically in terms of delivering sustainable patterns of development and minimising the need to travel by promoting active and sustainable travel patterns. It is also considered that more suitable and appropriate site options, in this case Finkley Down Farm, are available and would deliver sustainable patterns of development that support the objectives of the Spatial Strategy.

- 6.10 Sites at Ludgershall do not, in our view, represent appropriate locations for development at the scale proposed. The site-specific analysis fails to give sufficient weight to the challenges associated with the delivery of land east of Ludgershall, resulting from the reality of this site being severed from the A342 (Andover) Road and public transport connections.
- 6.11 We are concerned that conclusions that the road network may have capacity to accommodate development at Ludgershall, means that the Local Plan is willing to promote less sustainable development sites where opportunities for reducing car dependency are significantly lower than site options at Andover.
- 6.12 The proposed allocations at Ludgershall are identified in the Sustainability Appraisal as being sequentially preferable to land at Finkley Down Farm. However, this is not supported by the Council's own evidence.
- 6.13 We support the approach of the Local Plan to direct strategic allocations to Andover, this is consistent with the role and function of the settlement and reflects the wide range of services and facilities, including employment and public transport provision which is available at this top tier settlement.
- 6.14 However, the site selection process and Sustainability Appraisal make conclusions on Finkley Down Farm which are inconsistent with the Council's own evidence. The sustainability assessment of Finkley Down Farm out performs alternative options at Manor Farm and in accessibility terms, Finkley Down Farm is a top performing development option.
- 6.15 The Council's site selection process artificially, and with justification, considers Finkley Down Farm only as a development option in addition to Manor Farm. There is no sound rationale why this is the case. This is inconsistent with the clear outputs from the Sustainability Appraisal which demonstrate that Finkley Down Farm performs better against the SA objectives than Manor Farm.
- 6.16 Concerns raised regarding local highway capacity and local pinchpoints (Enham Arch) are not supported by the Council's own transport modelling and are applied as constraints to Finkley Down Farm, but not to Manor Farm which would use the same local road network.
- 6.17 We welcome the progress that has been made in advancing the new Local Plan for the Borough and support as a matter of principle, the continued recognition that Andover is a focus for development.

- 6.18 However, we do not support the inclusion of sites at Ludgershall as these neither support the objectives of the spatial strategy or represent that most appropriate development locations.
- 6.19 Land at Finkley Down Farm has not been considered on a fair and comparable basis. The ability of this site to deliver strategic scale development in a manner which supports sustainable development, consistent with the objectives of the local plan, whilst supporting the role and function of Andover has been artificially curtailed through the site selection process and assessment of reasonable growth scenarios.

### **Changes Sought**

- 6.20 In light of our representations and in the interests of preparing a Local Plan which will satisfy the tests of soundness, it is considered essential that the inconsistencies in the site selection process are addressed prior to the Regulation 19 stage.
- 6.21 The assessment Finkley Down Farm is premised on a reduced development capacity of 900 dwellings. This site has consistently been promoted, informed by site specific circumstances, including landscape sensitivity, for development in the order of 1,500 dwellings.
- 6.22 The reduction in capacity applied to Finkley Down Farm appears to be artificial and not based on a detailed understanding of the site specific circumstances. As such, the quantum of development assessed should reflect submissions made on behalf of Taylor Wimpey to previous consultations and through the SHELAA.
- 6.23 From a transport perspective, there appears to be no valid reason as to why Land at Finkley Down Farm has been omitted from Growth Option 2 (transport modelling) in place of sites with lower levels of transport accessibility by sustainable and active travel modes.
- 6.24 It is concluded that this results in a fundamental oversight in the fair and comprehensive assessment of the growth options. It is strongly recommended that variations of Growth Options which information the transport modelling are undertaken, to include the following:
- Growth Option 1 but with Finkley Down Farm (full development);
  - Growth Option 2 but with Land at Finkley Down Farm (full development) in place of Land at Manor Farm;
  - Growth Option 2 with Land at Finkley Down Farm (full development) but no Land south of A342 and east Shoddesden Lane, Ludgershall respectively.

- 6.25 Without these additional options, Land at Finkley Down Farm has not been fairly assessed.
- 6.26 Within the reasonable growth scenarios the inclusion of Manor Farm as a constant is not justified and therefore growth scenarios should include alternative options to consider Finkley Down Farm (full quantum) without this site being regarded as an additional option to Manor Farm.



## **APPENDIX 1**

### **SHELAA Submissions**

22<sup>nd</sup> August 2022



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

**BY EMAIL**

Dear Mr Goodridge

**Ref: Finkley Down Farm Andover (Taylor Wimpey) SHELAA Update 2022.**  
**SHELAA Ref: 165**

On behalf of my client, Taylor Wimpey UK Ltd, I write to submit additional information in respect of land at Finkley Down Farm, Andover, which is currently identified in the latest iteration of the TVBC Strategic Housing & Economic Land Availability Assessment (SHELAA) – Site Reference 165.

This submission follows the invitation for additional information to be provided, as part of the update to the SHELAA. For the avoidance of doubt, we continue to request that land at Finkley Down Farm (Andover) is considered through this process as a potential development location as part of the Local Plan Review.

**Land at Finkley Down Farm.**

Alongside submissions to various iterations of the SHELAA, representations have been submitted on behalf of Taylor Wimpey UK Ltd to previous consultations on the Local Plan, the most recent being the Stage 1 Regulation 18 consultation which concluded in April 2022.

As an extension to the Augusta Park development area, land at Finkley Down Farm provides a genuine opportunity to support the delivery of a significant number of new homes and associated infrastructure, and in doing so, supporting the role of Andover as a top tier settlement.

The 2021 update to the SHELAA reinforces our previously stated position that there are no site-specific constraints that would suggest development at Finkley Down Farm is not capable of being delivered.

Indeed, its location adjacent to Andover, is recognised within the SHELAA as being accessible to the widest range of facilities and services which are present at this major centre. It being a location which also maximises sustainable transport choices and is more accessible due to better public transport provision.

Development at Finkley Down Farm can support a highly sustainable movement strategy, maximising sustainable transport choices, specifically public transport connections to key destinations in and around Andover.

Responding positively and creatively to support a highly sustainable pattern of development, incorporating robust and deliverable strategies for Carbon reduction/neutral measures, net gains in biodiversity, landscape enhancements and protections, and protection of heritage assets will frame the emerging proposals at Finkley Down Farm.

As the Local Plan is progressed, including new strategic and non-strategic policies that are essential to deliver the vision and objectives of the Local Plan, the opportunities presented by the Finkley Down Farm site, to support and implement the overarching strategy for growth at a top tier settlement can be articulated further. Through this SHELAA update, we provide additional information in support of this site.

### **Additional Information.**

Through this 2022 SHELAA update we provide additional and updated information on a range of matters.

### **Taylor Wimpey**

As a leading national housebuilder, delivering over 15,000 new homes each year, including the Augusta Park development at Andover, Taylor Wimpey UK Ltd are well placed to deliver new homes through the Local Plan Review process. This record of housing delivery is framed within the following strategic commitments and objectives:

*“All our homes are “net zero carbon ready” to meet policy aspirations.*

*Over 50% of our homes are sourced through strategic sites and we have dedicated teams that champion their delivery through the local plan system. Along this journey, we are committed to working with local people and authorities as part of our placemaking approach to sustainable developments. We want you to be just as proud of the communities we build together as we are.*

*But as a company, we recognise our world – our home – is in trouble. We want to be part of the solution – working together to minimise the impact we have on climate change, and protecting our planet for future generations. We’re committed to challenging, measurable targets based on science, to reduce our carbon footprint, as part of our contribution to housing and community needs.*

*Within our published Environment Strategy (enclose), Taylor Wimpey commitments include:*

- *Reducing operational carbon emissions by 36% by 2025.*
- *Reducing emissions from customer homes by 75% by 2030.*
- *To use 100% green electricity for all our new sites.*

- *Reducing our fleet emissions by 50% by 2025.*
- *Ensuring 97% of all construction waste is recycled. Over time, we're aiming to reach 100% on all future sites.*
- *Delivering a 10% net gain on all new sites by from 2023.*
- *Enhancing wildlife beyond the 10% calculation by phasing in requirements for all new sites to provide: Hedgehog Highways, Bug Hotels, bat and bird boxes, and all suitable sites having reptile and amphibian hibernation areas.*
- *Provide customers with information on their sites and gardens, so they can fully understand, enjoy and support nature.*

*These commitments align with our corporate strategy to 'Do the right thing', taking responsibility in a respectful and fair way, to build a better tomorrow we can be proud of. It underpins everything we do, and we look forward to delivering on our promises."*

## **The Design Vision**

We enclose within this submission to the SHELAA update a summary of the overarching Vision which has informed the current iteration of the illustrative masterplan – CSA/1845/123/ Rev B.

This Vision, alongside site specific technical work, will inform the evolving design and masterplanning process, to deliver a pattern of development which provides a wide range of community facilities, within easy walking and cycling distances, alongside achieving a strong sense of place, associated with the Augusta Park development area, but also a strong sense of place in its own right.

## **Transport Strategy**

The Transport Strategy sets out the emerging approach which is focused on the promotion of sustainable transport measures, aiming to reduce the reliance of existing and future residents in the area on private vehicle trips. In developing this strategy, it has been prepared in the context of adopted and emerging policy and guidance, and also considers the potential travel behaviour changes following the Covid-19 pandemic.

The location of the Site enables the principles of the '20-Minute Neighbourhood' to be achieved. The 20-Minute Neighbourhood concept suggests that new development should be located in area whereby the daily needs of residents (for example access to shops, schools and healthcare facilities) can be met by active travel modes (i.e. walking or cycling) within 20-minutes.

The benefits of this approach are as follows:

- people become more active, improving their mental and physical health;
- traffic and congestion is reduced;
- air quality is improved;
- local shops and businesses thrive; and
- community bonds are strengthened.

The distance of local facilities accessible from the Site, including the associated walking and cycling times, is summarised in **Table 2.1** of the Transport Strategy, with a plan showing where the facilities are located in relation to the Site shown in **Figure 2.1**.

In addition to good walking and cycling accessibility, the Site also benefits from good access to the local bus network. Two bus routes are within easy walking distance of the Site, located within the Augusta Park development to the west of the Site. The nearest stop is located along Fuller Way and is approximately 600m walking distance from the existing Site. The bus routes serving the stop are summarised at **Table 2.2** and shown in **Figure 2.3** of the Transport Strategy.

In line with strategic objectives set out within Test Valley draft Local Plan (2040), the Transport Strategy will be developed to prioritise sustainable connectivity such as walking, cycling and public transport and will make provision for charging electric vehicles. The Transport Strategy focuses on the following elements:

- Masterplan Development and Virtual Mobility;
- Access Strategy;
- Walking and Cycling Strategy;
- Public Transport Strategy; and
- Travel Plan

Full details of these elements are set out in the supporting document submitted as part of this update to the SHELAA.

The measures identified as part of this Transport Strategy are summarised below.

#### Access Strategy and Masterplan Development

- Vehicle access via a new junction on Finkley Road, to the north of the Site. A gateway/traffic calming feature can be provided to encourage low speeds as vehicles enter the Site.
- Priority will be given to pedestrians and cyclists
- The Masterplan will be developed to prioritise and support virtual mobility and sustainable travel behaviour. Streets will be designed to encourage low vehicle speeds, and high quality walking and cycling routes should be provided throughout;
- The provision of a Community Hub in a central location will be investigated as part of the Masterplan development. This could include sustainable transport measures such as public transport information and walking and cycling maps.

#### Sustainable Transport Strategy

- In addition to the primary access from Finkley Road, there is the potential to provide four pedestrian and cycle access points into the Site from Augusta Park. This would create a permeable development for pedestrians and cyclists;
- The Site benefits from being located next to NCN route 246, which provides a signposted walking and cycling route to Andover Town Centre;

- To the south of the Site, North Way provides a route underneath the railway line toward Walworth Business Park. Improvements to the walking and cycling network could be provided here;
- The Applicant will work with the local highway authority and bus operator to investigate the potential for bus services to be extended into the Site, via a new bus loop with bus priority sections;
- All residents will have access to an electric vehicle charging point
- The Applicant will implement a robust Travel Plan;

Other measures that will be explored include:

- Travel vouchers for use on public transport
- Real time information provision; and
- Vouchers to spend on walking and cycling equipment;
- Bicycle and Scooter hire scheme (including e-bicycles and e-scooters);
- Car Clubs
- Personalised Travel Planning and MyPTP; and
- A Liftshare Scheme.

This Transport Strategy is an evolving document, which will be developed through discussions with the local authorities, public transport operators, the local community and other stakeholders.

## **Flood Risk and Drainage**

### Flood Risk

A Flood Risk and Drainage Technical Note is submitted which shows the site to be entirely within Flood Zone 1, having less than 0.1% (1:1,000) annual probability of pluvial or fluvial flooding.

The Environment Agency Risk of Flooding from Surface Water mapping shows two small areas of risk along the southern boundary with the railway. Surface water flood risk will be managed on site using a Sustainable Drainage System (SuDS). The underlying bedrock geology is permeable chalk flooding from groundwater is therefore unlikely.

### Surface Water Drainage

The underlying bedrock is a permeable chalk. Ground investigation for the existing East Anton development immediately to the west shows that the chalk is suitable for the use of infiltration. The geology for the two sites is shown to be the same (Seaford Chalk Formation).

Infiltration based SuDS will be used to dispose of surface water runoff from the proposed development as the existing East Anton development immediately to the west.

The SuDS will comprise of infiltration features such as basins, swales, soakaways, permeable/porous surfaces, etc.

## Foul Sewage

The foul drainage for the proposed development will connect to the existing Southern Water Foul Sewerage Infrastructure.

## **Biodiversity Net Gain**

A Biodiversity Net Gain Technical Note has been prepared which considers the ability of site 165 to accommodate residential development while delivering Biodiversity Net Gain (BNG). The Technical Note presents the findings of our initial appraisal of the projected biodiversity gains and losses associated with development at this site.

This BNG Appraisal aims to:

- Provide an initial, illustrative classification of the type, distinctiveness, condition and strategic significance of habitats present prior to and post-development.
- Clearly identify data collection methods and any limitations. Give an indicative projection of the gains and losses of biodiversity which could reasonably be expected to result from development of the Site.
- Identify opportunities for off-site habitat creation to offset any net loss of habitat units on-site.

This Biodiversity Technical explains that under the current Illustrative Masterplan (CSA/1845/123/Rev B), biodiversity net gain is achievable at the Site to a level greater than 10%, which is consistent with emerging legal and policy requirements.

## **Summary**

As articulated through our previous representations to the emerging TVBC Local Plan, we consider that land at Finkley Down Farm (Andover) provides a genuine and sustainable development opportunity that can support the development needs of the Borough and the role and function of Andover. Specifically we have demonstrated in this submission of additional information, the following:

- The Vision and objectives to create a high-quality and logical pattern of development.
- A clear strategy for sustainable travel patterns.
- The ability to achieve significant gains in biodiversity.
- The commitment to delivering high-quality and sustainable development, responding positively to the declared climate emergency and opportunities for reducing the carbon impact of development.
- The absence of any flood risk or drainage constraints that would impact on the ability of this site to deliver the proposed development.

The additional information submitted to this SHELAA 2022 update is intended to demonstrate the key considerations that inform the emerging proposals for development at this site.

We look forward to the opportunity to discuss the suitability of the Finkley Down Farm site, and to explain the evolution of proposals since our previous representations and critically, to

demonstrate how Finkley Down Farm represents a highly sustainable and ultimately deliverable development opportunity at Andover.

Yours sincerely



James Millard MRTPI

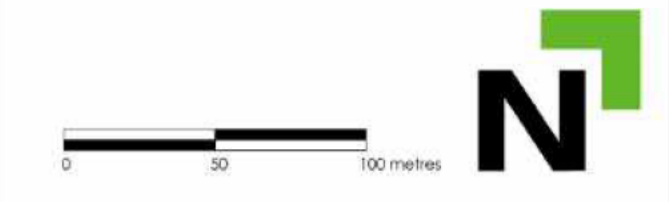
**Director**



Cc. Mr John Drew – Taylor Wimpey UK Ltd

Enc.

1. Illustrative Masterplan Finkley Down Farm – CSA/1845/123 Rev B
2. Transport Strategy (TPA – August 2022)
3. Vision for Finkley Down Farm (CSA August 2022)
4. Biodiversity Net Gain Feasibility Study – Technical Note (CSA – 2022)
5. Biodiversity Metric 3.1 Calculations (CSA 2022)
6. Flood Risk & Drainage Technical Note
7. Taylor Wimpey Environment Strategy 2021



- Illustrative masterplan boundary
- Wider landholding
- Existing:
  - Trees
  - Hedgerows
  - Arable land
  - Archaeological Finds
- Phasing
  - Phase 1
  - Phase 2
  - Phase 3
- Development Areas
  - Development parcels
- Proposals
  - Bus route - Phase 1
  - Bus route - Phase 2
  - Bus stop and 300m isochrone
  - Potential econdary access point for emergency vehicles, pedestrians and cyclists
  - Shared vehicular/pedestrian space
  - Equipped childrens play areas
  - Neighbourhood Equipped Area for Play
  - Pedestrian only links
  - Structural planting
  - Open space
  - School
  - Infiltration Basin as part of SuDs Strategy
  - Potential future access points

LANDUSE BUDGET FOR LAND EAST OF BRIDLEWAY WITHIN ILLUSTRATIVE MASTERPLAN

|                              |           |
|------------------------------|-----------|
| Illustrative masterplan area | 64.30 Ha  |
| 2 FE Primary School          | 2.00 Ha*  |
| Net residential:             |           |
| Phase 1:                     | 12.52 Ha  |
| Phase 2:                     | 12.44 Ha* |
| Phase 3:                     | 14.57 Ha  |
|                              | 39.53 Ha  |

\*2 FE Primary School Site (2.00 Ha) not included in Phase 2 net residential area

|                                    |              |         |                      |
|------------------------------------|--------------|---------|----------------------|
| Rev                                | Date         | By      | Description          |
|                                    |              |         |                      |
| B                                  | 30.05.22     | RC      | BNG area amended     |
| A                                  | 24.05.22     | SM      | Access point amended |
| CSA environmental                  |              |         |                      |
| Project Finkley Down Farm, Andover |              |         |                      |
| Title Illustrative Masterplan      |              |         |                      |
| Client Taylor Wimpey UK Ltd        |              |         |                      |
| Scale                              | 1:2800 @ A1  | Drawn   | MM                   |
| Date                               | May 2022     | Checked | CS                   |
| Drawing No.                        | CSA/1845/123 | Rev     | B                    |

A Planning Application by  
**TAYLOR WIMPEY UK LIMITED**

In respect of  
**Finkley Down Farm,  
ANDOVER**

**Transport Strategy**

**August 2022**



## Document Management

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### Document Review

|    | Status                | Author | Checker | Approver | Date         |
|----|-----------------------|--------|---------|----------|--------------|
| 01 | Draft                 | AC     | RR      | JD       | 18   08   22 |
| -  | Issue                 |        |         |          |              |
| A  | Revision <sup>a</sup> |        |         |          |              |
| B  | Revision <sup>b</sup> |        |         |          |              |
|    |                       |        |         |          |              |
|    |                       |        |         |          |              |

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<sup>a</sup>

<sup>b</sup>

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A Site Masterplan

B Drawing SK01 – Indicative Finkley Road Site Access Arrangement

# 1 Introduction

- 1.1 This Transport Strategy has been prepared by Transport Planning Associates (TPA) on behalf of Taylor Wimpey UK Limited to support the promotion and delivery of a residential led development located on Land at Finkley Down Farm, Andover, Hampshire, (hereafter referred to as 'the Site').
- 1.2 The Site is situated within the jurisdiction of Test Valley Borough Council, who is the Local Planning Authority. Hampshire County Council is the Local Highway Authority.
- 1.3 A Site location plan is shown in **Figure 1.1**. The Site is located to the east of Andover. It is bound to the north and east by existing agricultural land, to the south by a railway line and to the west by an existing residential development known as Augusta Park.
- 1.4 An indicative Site Masterplan is provided as **Appendix A**.

## Test Valley Local Plan 2040

- 1.5 Test Valley Borough Council is in the process of preparing their new Local Plan. This will replace the current Revised Local Plan 2011-2029, adopted in 2016, and will set out planning policies to guide future development within the Test Valley area, up to 2040.
- 1.6 As part of the Local Plan review, new site allocations will be identified relating to housing. Taylor Wimpey UK Limited is promoting Land at Finkley Down Farm for inclusion as an allocation within the Local Plan. The Site, which currently comprises 78.16 hectares of agricultural land, is being promoted for the delivery of approximately 1,500 dwellings along with a primary school, playing fields, allotments and new landscape parkland. From a transport perspective, it is considered that the Land at Finkley Down Farm is appropriate for residential development of this scale.
- 1.7 In 2021, Test Valley Borough Council published their Strategic Housing and Economic Land Availability Assessment (SHELAA). The SHELAA sought to identify and assess land which landowners and developers are willing to make available to inform potential future allocations for housing and employment. Finkley Down Farm was identified in the SHELAA as a Site that could deliver up to 1,600 new homes.

## This Transport Strategy

- 1.8 This report sets out the emerging Transport Strategy for the Site. Key to the proposed strategy is the promotion of sustainable transport measures, aiming to reduce the reliance of existing and future residents in the area on private vehicle trips.
- 1.9 This report has been prepared in the context of adopted and emerging policy and guidance, and with consideration of potential travel behaviour changes following the Covid-19 pandemic.
- 1.10 The report is structured as follows:
- Chapter 2: Site Context
  - Chapter 3: Local Travel Behaviour
  - Chapter 4: Transport Policy and Guidance
  - Chapter 5: Transport Strategy Overview
  - Chapter 6: Masterplan Development and Virtual Mobility
  - Chapter 7: Access Strategy
  - Chapter 8: Walking and Cycling Strategy
  - Chapter 9: Public Transport Strategy
  - Chapter 10: Travel Planning and Other Sustainable Transport Measures
  - Chapter 11: Summary and Conclusion
- 1.11 With the measures set out within this document, it is concluded that the Site can deliver approximately 1,500 dwellings along with a primary school, playing fields, allotments and new landscape parkland.
- 1.12 This Transport Strategy is an evolving document, which will be developed through discussions with the local authorities, public transport operators, the local community and other stakeholders.

## 2 Site Context

2.1 This section of the Transport Strategy summarises the existing Site from a transport perspective.

### Site Location

2.2 A Site location plan is shown in **Figure 1.1**.

2.3 The Site encompasses existing agricultural land, located immediately to the east of Augusta Park, and approximately 3km to the east of Andover Town Centre. The Site is bound to the south by a railway line, and to the north and east by agricultural land.

### Local Facilities

2.4 The location of the Site enables the principles of the '20-Minute Neighbourhood' to be achieved. The 20-Minute Neighbourhood concept suggests that new development should be located in areas whereby the daily needs of residents (for example access to shops, schools and healthcare facilities) can be met by active travel modes (i.e. walking or cycling) within 20-minutes. The benefits of this approach are as follows:

- people become more active, improving their mental and physical health;
- traffic and congestion is reduced;
- air quality is improved;
- local shops and businesses thrive; and
- community bonds are strengthened.

2.5 A 20-minute walk relates to a distance of approximately 1.6km at an average walking speed of 80m per minute. A 20-minute cycle relates to a distance of approximately 5.3km at an average cycling speed of 268m per minute (10 mph).

2.6 The concept draws upon previous guidance for appropriate distances to walk and cycle. For example:

- Planning Policy Guidance (PPG) 13 (2006) stated that, *"Walking is the most important mode of travel at the local level and offers the greatest potential to replace short car trips, particularly under two kilometres"* and, *"Cycling also has potential to substitute for short car trips, particularly those under five kilometres"*.
- The Chartered Institution for Highways and Transportation (CIHT) document 'Planning for Walking' (2015) recommends a catchment of around 800m (10-minutes) to key facilities. However, it also states that people will walk if their destination if it is less than a mile away (1.6km or 20-minutes).

- 2.7 Andover is a medium sized town, which encompasses a number of local facilities for day-to-day needs, such as supermarkets, primary and secondary schools, healthcare facilities, pubs and restaurants, places of worship, and sports facilities. All of these can be accessed from the Site within a 20-minute active travel trip (walk or cycle).
- 2.8 The distance of local facilities accessible from the Site, including the associated walking and cycling times, is summarised in **Table 2.1** below. A plan showing where the facilities are located in relation to the Site is shown in **Figure 2.1**.

**Table 2.1 Summary of Local Facilities and Amenities**

| Facility Type                    | Facility Name                          | Distance | Approximate Travel Time |                    |
|----------------------------------|--|----------|-------------------------|--------------------|
|                                  |  |          | Walking (Minutes)*      | Cycling (Minutes)* |
| Bus Service                      | Fuller Way Bus Stop                    | 600m     | 8                       | 3                  |
| Schools                          | Finkley Down Farm Nursey and Preschool | 500m     | 4                       | 2                  |
|                                  | Endeavour Primary School: Kirk Site    | 700m     | 5                       | 2                  |
|                                  | Endeavour Primary School: King Site    | 1.2km    | 15                      | 5                  |
|                                  | Finkley East Anton Nursey & Pre-School | 1.3km    | 17                      | 5                  |
|                                  | Shepherds Spring Pre-School Nursery    | 1.8km    | 23                      | 7                  |
|                                  | Smannell Field School                  | 1.9km    | 24                      | 7                  |
| Railway Station                  | Andover Railway Station                | 4km      | -                       | 15                 |
| Medical Facilities               | Shepherds Spring Medical Centre        | 1.7km    | 21                      | 6                  |
| Places of Worship                | Koinonia Evangelical Church            | 600m     | 8                       | 3                  |
|                                  | St Pauls' Church Centre                | 1.8km    | 23                      | 7                  |
| Supermarkets/ Convenience Stores | The Co-operative Food                  | 1.2km    | 15                      | 5                  |
|                                  | Tesco Express                          | 1.6km    |                         |                    |
|                                  | One Stop                               | 1.7km    | 21                      | 6                  |
|                                  | Lidl                                   | 1.9km    | 24                      | 7                  |
|                                  | Tesco Extra                            | 2.5km    | 31                      | 9                  |
|                                  | Fuller Way Playground                  | 300m     | 4                       | 1                  |

|                        |   |       |    |   |
|------------------------|---|-------|----|---|
| Outdoor Spaces         | Icknield Way Play Park                    | 1.1km | 14 | 4 |
|                        | Picket Piece Sports Ground                | 2km   | 25 | 7 |
| Sports/Leisure Centres | Fighting Falcons School of Martial Arts   | 1.8km | 23 | 7 |
|                        | 3 Step Fitness                            | 2km   | 25 | 7 |
|                        | Fevo Gym                                  |       |    |   |
|                        | Xion Gym Andover                          |       |    |   |
| Post Office            | Picket Piece Post Office                  | 1.9km | 24 | 7 |
| Community              | Augusta Park Community Centre             | 1.3km | 17 | 5 |
|                        | Picket Piece Social Club and Village Hall | 1.8km | 23 | 7 |
| Hairdressers           | Freestyle                                 | 2km   | 25 | 7 |
|                        | MXS Hairstudio                            |       |    |   |
|                        | Nita Hair                                 |       |    |   |
|                        | Tranquil                                  |       |    |   |
| Hospitality            | Pizza Time                                | 1.2km | 15 | 5 |
|                        | Smart Fish Bar                            | 1.2km | 15 | 5 |
|                        | The Swallow                               | 1.7km | 21 | 6 |
|                        | Starbucks                                 | 2km   | 25 | 7 |

*\*Based on an average walking speed of 80m per minute, and an average cycling speed of 268m per minute (10mph)*

2.9 Table 2.1 and Figure 2.1 show that the proposed development can work within the principles of 20-minute neighbourhood concept, with multiple day-to-day facilities within walking and cycling distance.

2.10 Key facilities that are located within a 20-minute walk of the Site include;

- A number of primary schools and nurseries;
- A Medical Centre;
- Places of Worship;
- Supermarkets and Convenience Stores; and
- Play Parks.

2.11 The whole of Andover is within a 20-minute cycle from the Site, including the Town Centre and Railway Station, and a number of food stores.

## Existing Walking and Cycling Infrastructure

- 2.12 The National Cycle Network (NCN) operates through Andover. This is a UK-wide network of signed paths and routes for walking and cycling.
- 2.13 NCN Route 246 is a 31.6 mile route connecting Timsbury to Kintbury, via Andover. In the local context, NCN Route 246 runs along the northern boundary of the Site on Finkley Road. It provides a good quality and signposted walking and cycling route from the Site into Andover Town Centre.
- 2.14 NCN Route 246 is shown in **Figure 2.2**.

### *Public Rights of Way*

- 2.15 There is a section of a footpath (Ref: 005/7713/1) that crosses through the site in the north-western corner. The footpath connects onto a restricted byway which is situated along the western boundary of the site (Ref: 005/7753/1).

## Public Transport

### *Bus Services*

- 2.16 In addition to good walking and cycling accessibility, the Site also benefits from good access to the local bus network. Two bus routes are within easy walking distance of the Site, located within the Augusta Park development to the west of the Site. The nearest stop is located along Fuller Way and is approximately 600m walking distance from the existing Site. The bus routes serving the stop are summarised within **Table 2.2** and shown in **Figure 2.3**.

Table 2.2 Summary of the Local Bus Services

| Service Number | Bus Stop   | Route Description  | Approximate Frequency   |  |
|----------------|------------|--|---|--|
|                |            |  | Monday – Friday   | Weekends                               |
| 1              | Fuller Way | Andover Bus Station – Florence Court – Andover Bus Station | Every 15 minutes (between 0652 – 1905)<br>Every hour until 2135 | Every 30 minutes (0715 – 2135)         |
| 6              |            | Andover Bus Station – Tesco Car Park                       | Every 30 minutes (between 0625 – 1905)                          | Every 30 minutes (between 0705 – 1805) |

- 2.17 **Table 2.2** demonstrates that the local bus services provide frequent connections to key destinations within Andover, throughout the week and during the weekend.

### *Rail Services*

- 2.18 Andover Railway Station is located to the west of the Site, approximately 4km from the centre of the proposed development. The station provides frequent and direct services into London Waterloo, Salisbury and Exeter.
- 2.19 A summary of the services available at Andover Railway Station is provided in **Table 2.3**.

Table 2.3 Summary of Rail Services from Andover Railway Station

| Route Description   | Approximate Journey Time | Approximate Frequency                    |  |
|---------------------|--------------------------|--|--|
|                     |                          | Monday – Saturday                        | Sundays                                  |
| Exeter St Davids    | 3 hours                  | Every 30 minutes between 08:22 and 21:29 | Every 60 minutes between 08:26 and 22:24 |
| London Waterloo     | 60 minutes               | Every 30 minutes between 05:30 and 22:44 | Every 45 minutes between 07:02 and 22:46 |
| Gillingham (Dorset) | 50 minutes               | Every 60 minutes between 08:22 and 23:30 | Every 60 minutes between 08:26 and 22:24 |
| Salisbury           | 20 minutes               | Every 30 minutes between 07:48 and 23:30 | Every 30 minutes between 08:26 and 23:29 |
| Yeovil Junction     | 60 minutes               | Every 60 minutes between 08:22 and 23:30 | Every 60 minutes between 08:26 and 22:24 |
| Basingstoke         | 20 minutes               | Every 30 minutes between 05:30 and 22:44 | Every 60 minutes between 07:02 and 22:46 |
| Westbury            | 70 minutes               | Every 30 minutes between 07:47 and 22:29 | Every 60 minutes between 09:55 and 22:24 |

- 2.20 Table 2.3 shows that a number of trips to destinations both local and national can be made from Andover Railway Station.

### **Local Highway Network**

- 2.21 A description of the local highway network within the vicinity of the Site is set out below.

### *Finkley Road*

- 2.22 Finkley Road runs along the northern boundary of the Site in an east to west direction towards Andover. It is a single track rural road, which also forms part of the National Cycle Network.
- 2.23 To the north west of the Site, the road has recently been widened in association with the Augusta Park development. Here, Finkley Road becomes a single carriageway road, and connects onto a roundabout with Smannell Road.

### *North Way*

- 2.24 North Way is situated to the south of the Site, providing a route underneath the railway line. It connects Augusta Park and the existing Finkley Down Farm to the Walworth Business Park.

### *Finkley Farm Road and Fuller Way*

- 2.25 Finkley Farm Road forms the access road into Augusta Park, the residential development to the west of the Site. It is a single carriageway road that connects to Smannell Road to the north via a roundabout.
- 2.26 Fuller Way is the primary street through Augusta Park. It features street lighting and footways either side of the carriageway.

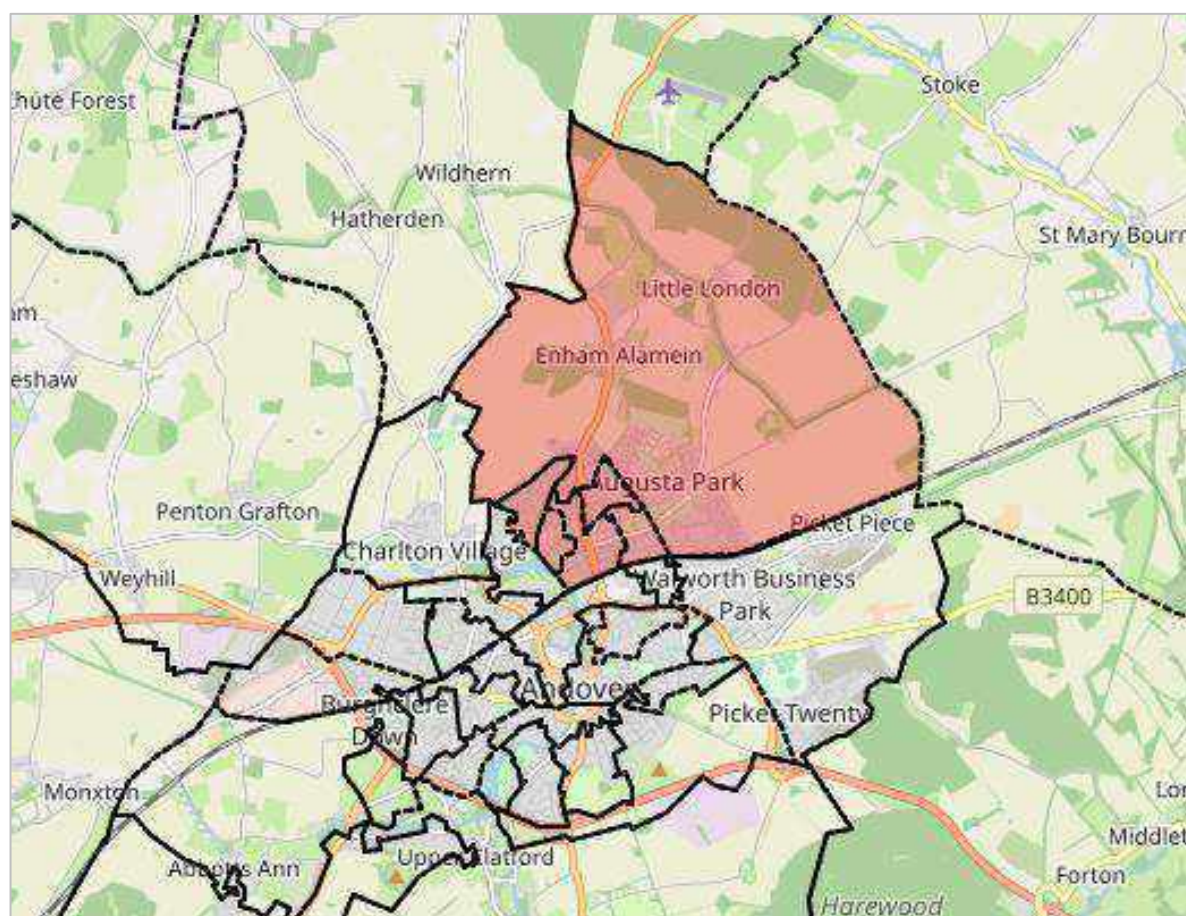
## **Summary**

- 2.27 This section has demonstrated that the Site is well connected in terms of walking, cycling and public transport to the surrounding transport network.

### 3 Local Travel Behaviour

- 3.1 In order to develop a Transport Strategy, it is important to understand the travel patterns and behaviour of the existing residents in the local area. This section provides an overview of local travel behaviour, based on Census 2011 data.
- 3.2 Census 2011 data is the main source of data currently available to help obtain an insight into how people travel at a local level. However, travel patterns in the future are likely to be different due to the effects and changing mind-sets brought about by the Covid-19 pandemic and subsequent lockdown. Therefore, whilst the information set out below provides a useful indication of how residents at the proposed site might have travelled in 2011, it is likely that changes will occur in the future.
- 3.3 The Lower Output Areas Test Valley 001C, 002A/B/C/D and 003A have been reviewed to understand local travel behaviour. The location of the output areas is shown in **Figure 3.1**.

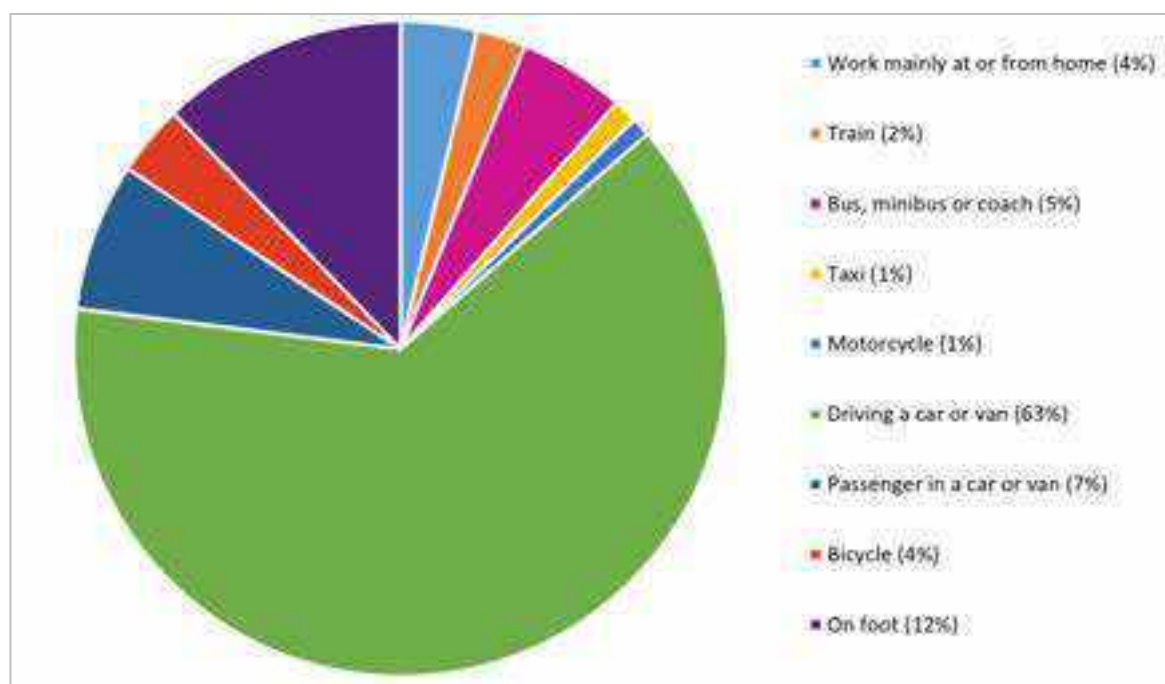
Figure 3.1 Andover Lower Output Areas



## Travel to Work Data

- 3.4 **Figure 3.2** displays the various methods of travel to work for residents in the Parish of Andover, based on the 2011 Census data for the above mentioned output areas.

Figure 3.2 Method of Travel to Work (Census 2011) – LOA Andover



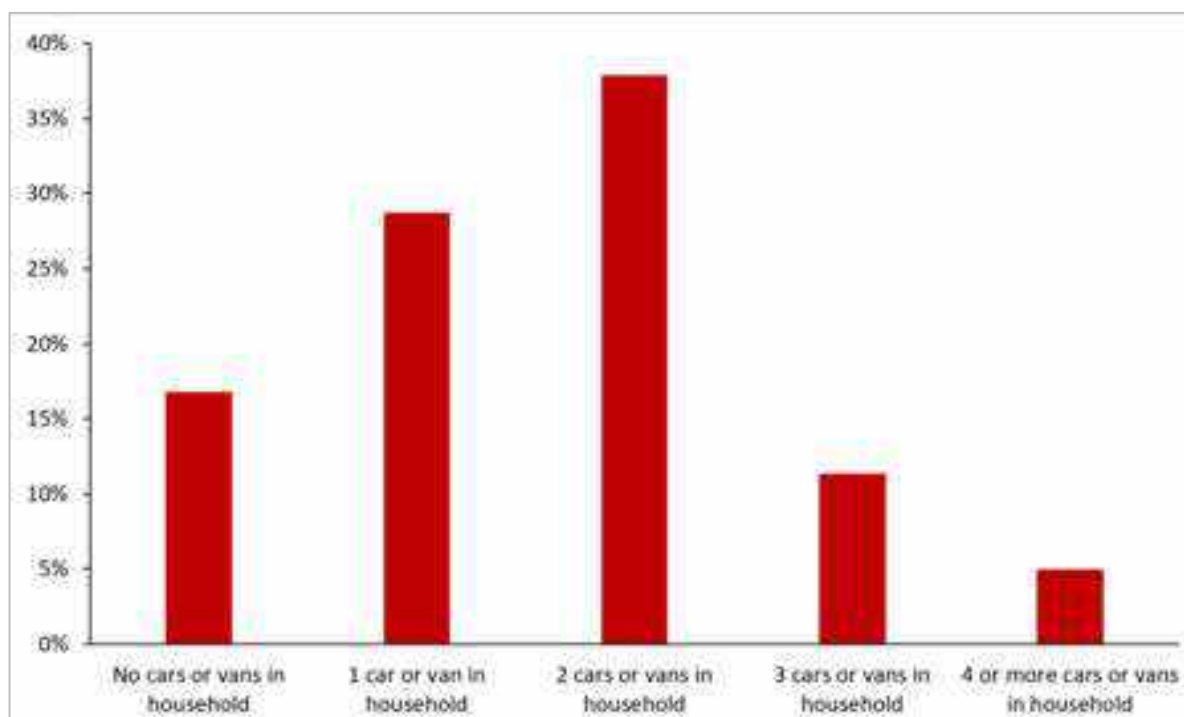
- 3.5 The data shows that, at the time of the 2011 Census, 63% of people drove to work with 7% travelling as a car passenger. In addition, 12% travelled on foot, 2% by train, 5% by bus, 4% by bicycle, and 1% by motorcycle.
- 3.6 It is noted that the 2011 Census data shows that 4% of people worked from home. At this stage, it is not clear what the long term effects of the Covid-19 pandemic will be on travel patterns. However, there is a consensus that the proportion of the population working from home, for at least part of the week, will increase significantly compared to pre-pandemic.
- 3.7 According to the Office of National Statistics (ONS), in 2019, 12.9% of people completed some employment duties from their place of residence during the week. This more than doubled in 2020 to 25.9%. The ONS also reports that 85% of working adults who worked from home during the pandemic wanted to use a hybrid approach to home and office working in the future.

- 3.8 Walking and cycling trips increased during the pandemic, and there was an emphasis on active travel to improve the health of individuals and the local air quality. In addition, since the 2011 Census, there has been an emphasis on the improvement of infrastructure for walking and cycling, in order to reduce the reliance on the private vehicle. Therefore, the mode share for walking and cycling is also likely to have increased since the 2011 Census.

### Car Ownership Data

- 3.9 **Figure 3.3** sets out the average car ownership per household for residents in the above mentioned output areas.
- 3.10 The 2011 Census data shows that the average household owns 1.4 vehicles. This is comparable to an average of 1.2 vehicles per household in England and Wales. However, the data also shows 17% of households do not own a vehicle, and that 29% of households own just one vehicle.

Figure 3.3 Average Car Ownership (Census 2011) – LOA Andover

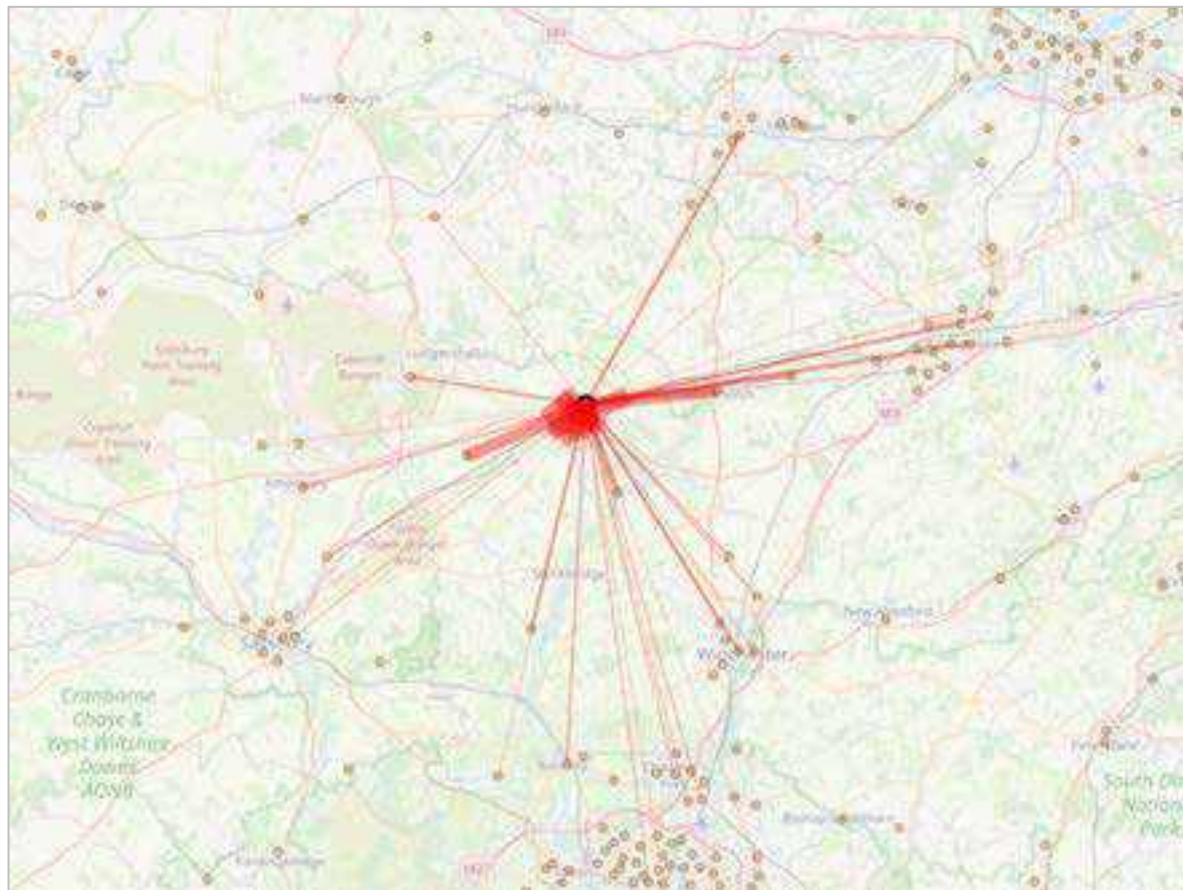


### Origin/Destination (Travel to Work) Data

- 3.11 The Census 2011 tool, 'Datashine' has been used to establish where people in the local area travel to for work. This is shown in **Figure 3.4**. The Datashine database uses Mid-Level Super Output Areas

(MSOA). The 'Test Valley 002 MSA' was chosen due to its proximity to the location of the proposed development

Figure 3.4 Resident Travel Origin/Destination Data (Datashine) – Test Valley 002 MSA



- 3.12 The information shows that 11% of people living within Test Valley 002 work within the same area, this includes working from/at home. A further 64% of residents travel within the Andover area, with 25% traveling to Test Valley 003 (including Andover Town Centre and Walworth Business Park), 16% to Test Valley 004 (central and north Andover) 13% to Test Valley 005 (west Andover) and 9% to Test Valley 004 (south Andover). Therefore, 75% of residents in Test Valley 002 live and work in Andover.

## Summary

- 3.13 The data from the 2011 Census shows that 62% of the local population drove to work in 2011.
- 3.14 However, it is also shown that 75% of the local population work within the Andover. Workplaces here are accessible via walking, cycling, and bus.

- 3.15 With the right transport strategy for the Site, more residents could be encouraged to travel to work via sustainable modes of transport, which would bring car use at the development down. In addition, the proportion of residents working from home, at least for part of the working week, is likely to increase significantly in light of changing travel patterns following the Covid-19 Pandemic and subsequent lockdown.

## 4 Transport Policy and Guidance

- 4.1 This section provides a brief overview of the latest and emerging transport planning policy and guidance, which has been considered in the preparation of this Transport Strategy. Transport policy and guidance has an emphasis on reducing the need to travel, and encouraging mode shift away from private car use where possible.

### National Planning Policy Framework (February 2021)

- 4.2 The NPPF came into force on 27 March 2012 and was revised in February 2019 and again in July 2021. It retains the core principle set out within the preceding national policy guidance for development to be located in order to help reduce car dependency by making walking and cycling trips easier and by encouraging public transport trips between housing and jobs, shops and services. In transport terms the thrust of NPPF is a presumption in favour of sustainable development (paragraph 10).
- 4.3 Paragraph 105 of the NPPF states that "... Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making."
- 4.4 Paragraph 110 of the NPPF states that "In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
- a. *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
  - b. *safe and suitable access to the site can be achieved for all users;*
  - c. *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and*
  - d. *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree."*

- 4.5 In line with the NPPF, the Site is sustainable due to the good public transport links, connecting the Site to Andover Town Centre, the ability to connect into the existing walking and cycling network, and the range of facilities within walking and cycling distance.

### **Test Valley Borough Revised Adopted Local Plan 2011-2029 (January 2016)**

- 4.6 The Local Plan for Test Valley was revised in January 2016 and is the current strategy document for the Borough until 2029.
- 4.7 The Local Plan highlights the key issues for transport including a desire to reduce localised journeys made by the private car, improving transport needs of those within rural locations and the future funding of transport schemes within the Borough.
- 4.8 Objective 13 focusses on the uptake of public transport, cycling and walking as a means of reducing reliance of cars.
- 4.9 In relation to the assessment of sustainable housing developments, Policy TP of Chapter 9 of the Local Plan includes the categories developments will be assessed against. The Policy permits developments that prove:
- (a) *Its location is connected with existing and proposed pedestrian, cycle and public transport links to key destinations and networks;*
  - (b) *Measures are in place to minimise its impact on the highway and rights of way network and pedestrian, cycle or public transport users;*
  - (c) *The internal layout, access and highway network is safe, attractive, in character, functional and accessible for all users and does not discourage existing and proposed users;*
  - (d) *It does not have an adverse impact on the function, safety and character of and accessibility to the local or strategic highway network or rights of way network; and*
  - (e) *Provision is made to support and promote the use of sustainable transport, including the submission of a site travel plan where appropriate.*

### **Test Valley Borough Draft Local Plan 2040 (February 2022)**

- 4.10 Test Valley Borough Council are currently in the process of updating their Local Plan to 2040 (LP40). The draft LP40 Regulation 18 Stage 1 document was released in February 2022 and includes more detailed proposals from previous versions presented for public consultation. The LP40 will replace the existing Local Plan 2011-2029 and will include revised policies and objectives to address the Borough's key issues. Importantly, the draft LP40 seeks to incorporate flexibility and resilience into their strategy and policies.
- 4.11 The LP40 reflects the current Adopted Local Plan's objectives for Transport and Movement by focussing on the encouragement of active and sustainable modes of transport to reduce the reliance on the private car. Furthermore, it seeks to ensure new development facilitates an improvements to enhance safety and connectivity to the existing transport infrastructure.

### **Andover Town Centre Masterplan Final Report (September 2020)**

- 4.12 Andover Town have published a masterplan that outlines the vision for the town, aided by residents and Test Valley Borough Council, to regenerate Andover as an attractive and sustainable town. Andover Masterplan is one of many published by the major towns within the Test Valley and will help guide policy of the LP40.
- 4.13 Whilst transport is not at the forefront of the report, by encouraging regeneration and the need for redevelopment, the transport infrastructure will be improved as the town continues to develop and become a desirable place to live for future residents.

### **Hampshire County Council Local Transport Plan 3 2011 – 2031 (June 2012)**

- 4.14 The Hampshire County Council (HCC) Local Transport Plan 3 (LTP3) is the current Transport Plan published in June 2012 for the period 2011 – 2031. It sets out the objectives and aims for achieving a sustainable and well-connected transport network across the region.
- 4.15 The LTP3 includes five main themes at the centre of all strategies, these are:
- (a) Supporting the economy through resilient highways – to support economic growth in Hampshire and to provide a safe, well-maintained and more resilient road network;
  - (b) Management of traffic – to maximise efficiency and improve safety of the network capacity which will improve reliability of the network and reduce emissions;

- (c) The role of Public Transport – to grow bus travel and rail services and remove barriers preventing uptake of busses to reduce dependency on the private car for local journeys;
- (d) Quality of life and place – by incorporating the ethos of ‘shared space’ and applying the Manual for Streets design to support a better balance between traffic and community life whilst achieving local targets for improving air quality and national carbon targets. Policy Objective 12 centres around investment into sustainable transport measures to provide a safe and healthy alternative to the private car; and
- (e) Transport and growth areas – to develop long-term transport strategy to enable sustainable development in major growth areas and high-quality public transport provision.

- 4.16 The LTP3 has a heavy focus upon the local traffic network with all main policies aimed towards improving the local network for motorised vehicles instead of promoting policies focussed upon active and sustainable modes of transport.

### **Hampshire County Council Draft Local Transport Plan 4 (April 2022)**

- 4.17 HCC is currently in the process of drafting the Local Transport Plan 4 (LTP4). It outlines the vision, principles and policies that will deliver a suite of core outcomes within the next 30 years. It recognises transport is a key contributor in economy, environment and society and a transport system is needed to support better outcomes for all three sectors.
- 4.18 The core aim of the LTP4 is to reduce the dependency on the private car to help meet all transport challenges outlined by HCC. Objectives included within the LTP4 include the provision of improved walking, cycling and public transport links to offer a more desirable alternative to the private car, which will include more bus lanes, cheaper bus fares and more reliable services.
- 4.19 As part of a series of proposed outcomes within the LTP4, Outcome F is focussed upon supporting sustainable housing and employment growth that positively supports the LTP4 vision. It states that a successful outcome would include *“New housing development where people choose to walk and cycle, have good access to public transport, and there is minimal need for parking spaces”*.

Outcome F is further supported through Policy C5: Support Local Living and Reduce Demands on Transport, with one of the measures supporting investment in walking, cycling and integrated public transport and new forms for shared mobility. A central focus of Policy C5 is the 20-minute neighbourhood highlighting the importance of proximity to local services, facilities and outdoor spaces; factors accentuated by the COVID-19 pandemic.

## Summary

- 4.20 National and local transport policy is aimed at reducing the reliance on the private vehicle and encouraging the uptake of public transport, walking and cycling. Key to this is ensuring that new development can be integrated into the existing transport network.
- 4.21 Section 2 of this Transport Strategy has demonstrated that the Site is well located for residential development. Details of how the development can be integrated into the existing transport network is set out in the remainder of this report.

## 5 Transport Strategy Overview

- 5.1 The following chapters set out the emerging Transport Strategy for the site. The principles of the Transport Strategy described in the following chapters will be built upon as the development takes shape and input from local stakeholders is considered.
- 5.2 In line with strategic objectives set out within Test Valley draft Local Plan (2040), the Transport Strategy will be developed to prioritise sustainable connectivity such as walking, cycling and public transport and will make provision for charging electric vehicles.
- 5.3 The Transport Strategy focuses on the following elements:
- Masterplan Development and Virtual Mobility;
  - Access Strategy;
  - Walking and Cycling Strategy;
  - Public Transport Strategy; and
  - Travel Plan
- 5.4 The following chapters discuss each element in turn.

## 6 Masterplan Development and Virtual Mobility

6.1 This section sets out the key principles of the sustainable transport aspects of the Masterplan.

### Virtual Mobility

6.2 Reducing the need to travel is the most sustainable tool from a transport planning perspective.

6.3 Virtual mobility does not involve any physical travel. It allows access to day-to-day facilities through the use of technology. For example, home working is now easily achievable through the use of email, remote server access points and video conferencing. In addition, online shopping use is increasing year upon year. With advances in technology, the potential of virtual mobility is substantial.

6.4 The Covid-19 pandemic and associated lockdown has demonstrated that many office-based jobs can be undertaken from home. According to the Office of National Statistics (ONS), in 2019, 12.9% of people completed some employment duties from their place of residence during the week. This more than doubled in 2020 to 25.9%. The ONS also reports that 85% of working adults who worked from home during the pandemic wanted to use a hybrid approach to home and office working in the future.

6.5 The development will facilitate the ability of residents to work from home through the provision of working space within dwellings, and access to high-speed broadband.

### Community/Mobility Hub

6.6 The development could include a community/mobility hub in a central location. This could include:

- Co-working space for residents who would like to work from an office environment, without the need to travel from the development;
- Sustainable travel information and maps;
- Bicycle parking and
- Bicycle and Scooter hire scheme (including e-bicycles and e-scooters);
- Delivery lockers;
- Car club spaces;
- Café/small shop; and
- Community Space

6.7 **Figure 6.1** shows an image prepared by ComoUK of what a community/mobility hub within a residential space could look like. ComoUK state that a community/mobility hub should be “...a recognisable place with an offer of different and connected transport modes supplemented with enhanced facilities and information features to both attract and benefit the traveller”

Figure 6.1 Example of a Community/Mobility Hub (ComoUK)



## Street Design

- 6.8 Streets will be designed to encourage low vehicle speeds, with high quality walking and cycling routes provided throughout the development.

## Electric Vehicle Charging Points

- 6.9 All residential units will have access to an electric vehicle charging point, to encourage the uptake of electric vehicles.

## Car Clubs

- 6.10 Car clubs provide a cost-effective and flexible alternative to owning a car. Pool cars are situated around an area, and car club members can book and use them when they require the use of a vehicle on a pay as you go basis. They can help tackle issues caused by congestion and parking whilst users do not have the hassle and cost of repairs and servicing.
- 6.11 As part of the development, the Applicant will investigate the possibility of providing car club vehicles within the Site for use by residents and the wider community.

## The 20-Minute Neighbourhood

- 6.12 The concept of the 20-minute neighbourhood is set out in Section 2. The concept suggests that new development should be located in areas whereby the daily needs of residents (for example access to shops, schools and healthcare facilities) can be met by active travel modes (i.e. walking or cycling) within 20-minutes. The features of the 20 minute neighbourhood are shown in **Figure 6.2**.

Figure 6.2 20-Minute Neighbourhood Features

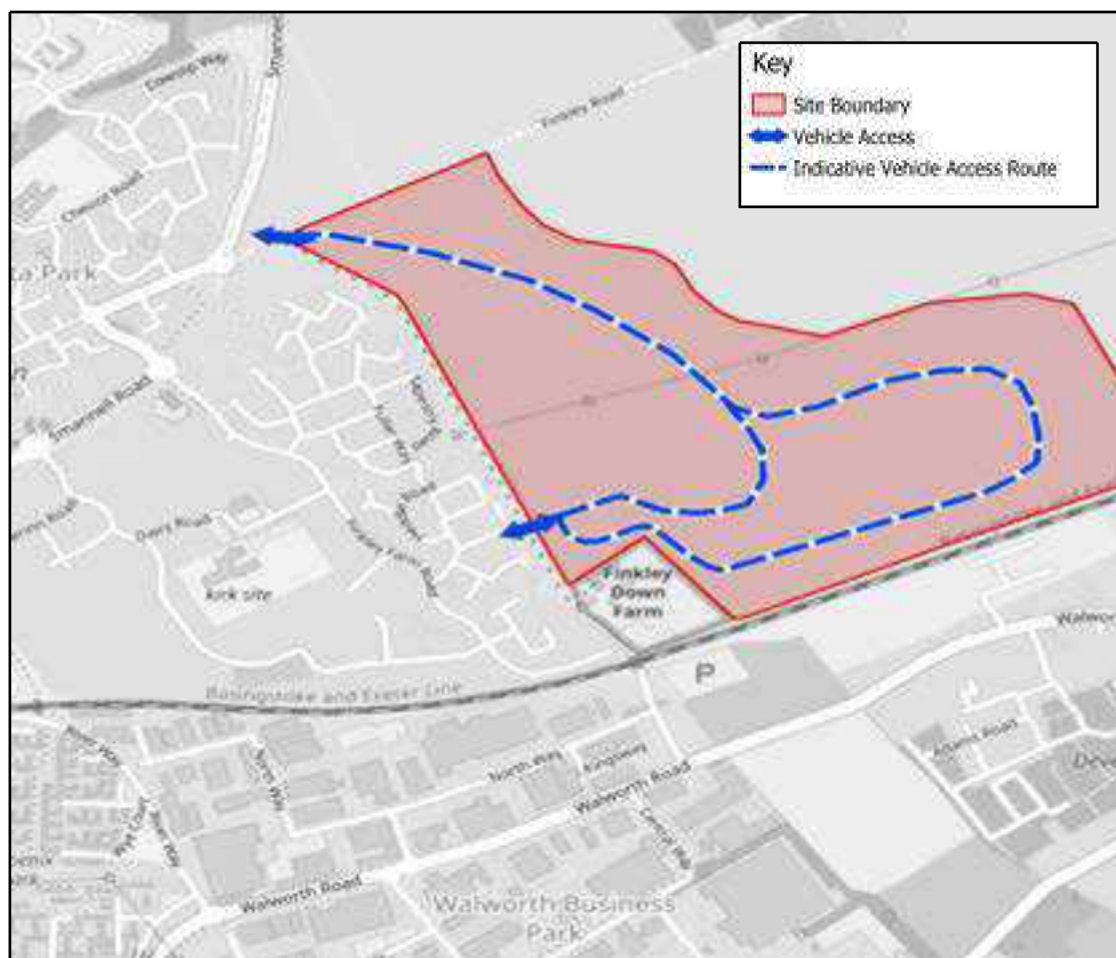


- 6.13 The proposed development will contribute to the 20-minute neighbourhood in east Andover. It will provide diverse and affordable homes, well connected paths, streets and spaces, a new school, green spaces and playing fields, and will be a place for all ages, benefiting the wider community in Andover.

## 7 Vehicle Access Strategy

7.1 The proposed access strategy for the Site is set out in **Figure 7.1**.

Figure 7.1 Vehicle Access Strategy



7.2 The preferred access arrangement is shown in **Drawing SK02**, included within **Appendix B**.

7.3 The preferred option involves the provision of a new junction on Finkley Road, to the north of the Site. There is a pinch point on Finkley Road just prior to the access. A gateway/traffic calming feature could be provided here to encourage low speeds as vehicles enter the Site, as opposed to widening the road in this location.

7.4 It is expected that priority would be provided for vehicles travelling into the Site over vehicles travelling on Finkley Down Road. Therefore, a give way line will hold vehicles travelling westbound on Finkley Road. As Finkley Road is part of the National Cycle Network, a raised table, demarcation or a crossing could be provided at the junction to give priority to pedestrian and cyclists over vehicles driving into the Site.

- 7.5 A secondary access could be provided via Skein Road, linking into Augusta Park. This could be used as a sustainable transport link, prioritising bus, pedestrians and cycling movements, as well as being used for emergency vehicles.
- 7.6 A primary street in the form of a loop could be provided to give access to the individual residential plots.
- 7.7 The vehicle access strategy will be developed through the evolution of this Transport Strategy, with input from the local highway authority and local community.

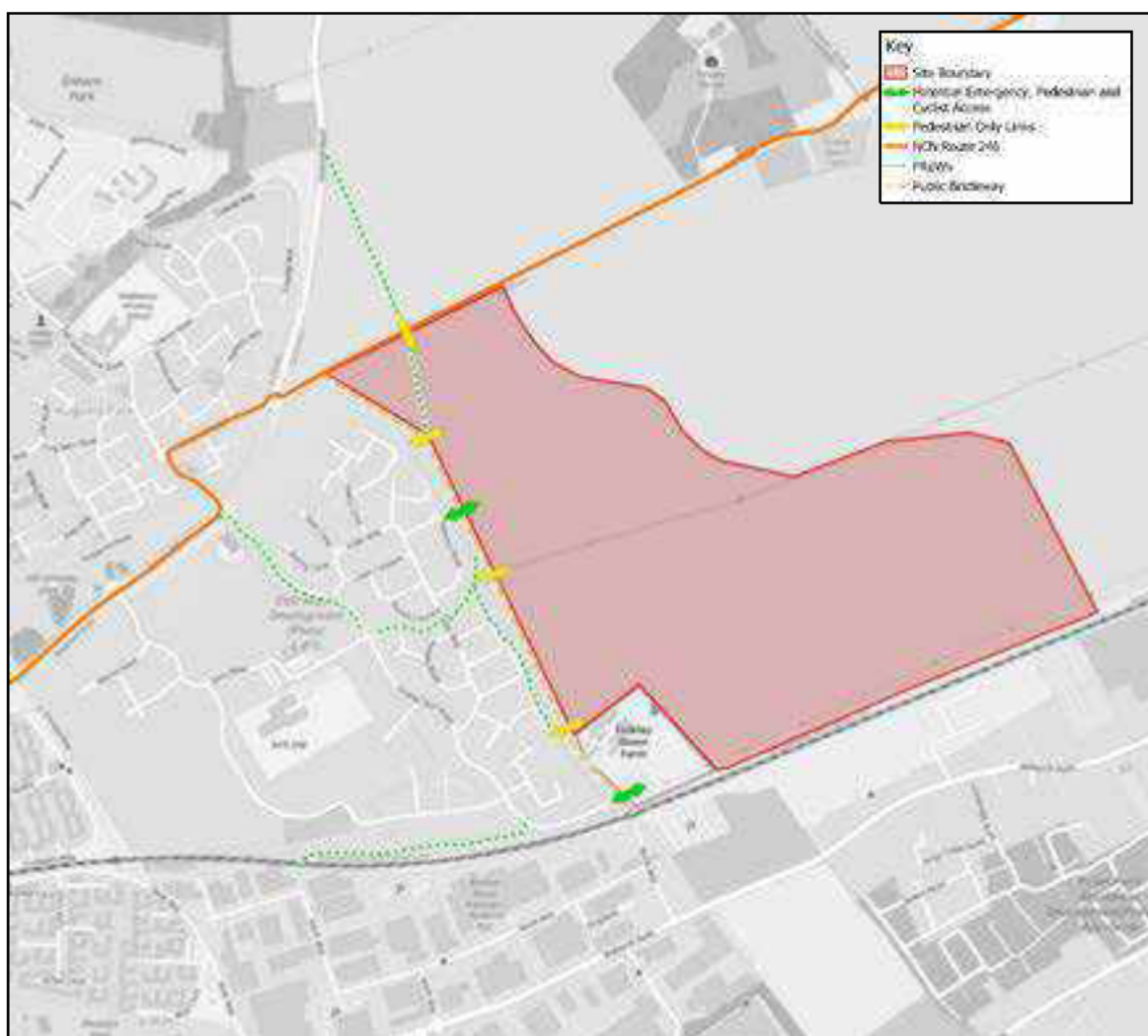
## 8 Walking and Cycling Strategy

- 8.1 Walking and cycling offers a significant opportunity to reduce the reliance on the private vehicle, particularly for shorter trips. The Site benefits from being located next to NCN route 246, which provides a signposted walking and cycling route to Andover Town Centre. Travel to work data for the local area shows that 12% of residents already walk to work on a daily basis and 4% cycle. Therefore, there is good potential for residents of the proposed development to walk or cycle for a large proportion of trips.

### Walking and Cycling Access

- 8.2 In addition to the primary access from Finkley Road, there is the potential to provide four pedestrian and cycle access points into the Site from Augusta Park. This would create a permeable development for pedestrians and cyclists.
- 8.3 To the south of the Site, North Way provides a route underneath the railway line toward Walworth Business Park. Improvements to the walking and cycling network could be provided here.
- 8.4 The potential walking and cycling connections from the Site are shown in **Figure 8.1**

Figure 8.1 Walking and Cycling Strategy



- 8.5 The proposed Masterplan will incorporate high quality walking and cycling routes throughout the development. The Masterplan will ensure the development provides excellent permeability for pedestrians and cyclists. The development will also ensure that walking and cycling connections to the local area are of good quality, with internal cycle routes provided in accordance to the latest guidance provided in Local Transport Note 1/20 (July 2021).

### Additional Measures to Encourage Walking and Cycling Uptake

- 8.6 A number of soft measures could be provided to residents in order to encourage walking and cycling. For example:
- Vouchers to spend on walking and cycling equipment;
  - Information on the best walking and cycling routes;
  - Bicycle and Scooter hire scheme (including e-bicycles and e-scooters);
  - Bicycle Surgeries; and
  - The setup of Community walking and cycling groups.

## Summary

- 8.7 This Section has set out options for walking and cycling connections. The Applicant will work with the local highway authority and the local community to see where improvements to walking and cycling connections in the local area can be implemented.

## 9 Public Transport Strategy

- 9.1 Public transport provision is a key component of the Sustainable Transport Strategy for the Site.

### Bus Strategy

- 9.2 As set out within Chapter 2, Fuller Road serves two bus routes with a high frequency service into Andover Town Centre.
- 9.3 A development of 1,500 units provides a critical mass for bus service improvements. There is the potential for bus routes to be extended into the Site to serve future residents. The development would provide pump-prime funding for bus routes to be extended into the Site for an initial defined period as the development is being built out. Following this, the extended bus service should be commercially viable.
- 9.4 The proposed bus link through the site is shown in **Figure 9.1**.
- 9.5 The bus route is planned in two phases to accompany the phased build out of the 1,500 proposed dwellings at the site. Both phases will introduce a bus stops at key locations of the Site with Phase 1 incorporating the adjacent Augusta Way residential development.
- 9.6 In addition, a mobility hub has been proposed, the hub has been placed centrally with regard to the layout of the development.

Figure 9.1 Proposed Bus Access Strategy



## Rail Strategy

- 9.7 As set out in Section 2, Andover Railway Station is located approximately 4km from the Site. The station provides frequent and direct services into London Waterloo, Salisbury and Exeter.
- 9.8 The rail station can be accessed in approximately 25 minutes by buses from Fuller Way, and in approximately 13 minutes by bicycle.
- 9.9 As set out in the Walking and Cycling Strategy, the Site will be linked to the local walking and cycling network so that residents can access the railway station. The Applicant will work with local highway authority and other key stakeholders to see where it can assist in delivering wider walking and cycling improvements, in scale to the development proposals.

## Other Measures

9.10 The following measures will also be explored as part of the Public Transport Strategy:

- Real time information and timetable provision within the Community/Mobility Hub; and
- The provision of bus ticket/rail ticket vouchers to residents of the proposed development.

## 10 Travel Planning and Other Sustainable Transport Measures

- 10.1 A Travel Plan with clear aims and objectives and suitably tailored measures will be key to delivering a successful Transport Strategy.
- 10.2 A Travel Plan is a package of measures and actions used to encourage modal shift away from single occupancy car use to other forms of mobility including walking, cycling, use of public transport and carpooling. By reducing car travel, travel plans can improve the health and wellbeing of its target population, reduce parking demand, and make a positive contribution to the community and the environment.
- 10.3 The key aims of the travel plan will be to:
- Implement and manage the sustainable transport measures;
  - Set targets for the reduction of private single occupancy vehicle use;
  - Monitor private single occupancy vehicle use against the targets; and
  - Establish if and where additional funding needs to be focused to achieve targets.

### Other Measures

- 10.4 Other measures that should be investigated as part of the Transport Strategy and Travel Plan are as follows:
- Personalised Travel Planning – where individuals get one-to-one advice on the travel options that are available to them;
  - MyPTP – a web-based tool providing individuals with journey planning advice; and
  - Liftshare – a tool to encourage and match individuals with other like-minded individuals seeking to car pool.

## 11 Summary and Conclusion

- 11.1 This Transport Strategy has been prepared by Transport Planning Associates (TPA) on behalf of Taylor Wimpey UK Limited to support the promotion and delivery of a residential led development located on Land at Finkley Down Farm, Andover, Hampshire.
- 11.2 Test Valley Borough Council is in the process of preparing its new Local Plan, which will set out planning policies to guide future development within the Test Valley area, up to 2040. As part of the Local Plan review, new site allocations will be identified relating to housing. Taylor Wimpey UK Limited is promoting Land at Finkley Down Farm for inclusion as an allocation within the Local Plan. The Site, which currently comprises 78.16 hectares of agricultural land, is being promoted for the delivery of approximately 1,500 dwellings along with a primary school, playing fields, allotments and new landscape parkland. From a transport perspective, and with the appropriate measures in place, it is considered that the Land at Finkley Down Farm is appropriate for residential development.
- 11.3 The measures identified as part of this Transport Strategy are summarised below.

### Access Strategy and Masterplan Development

- Vehicle access via a new junction on Finkley Road, to the north of the Site. A gateway/traffic calming feature could be provided here to encourage low speeds as vehicles enter the Site. Priority will be given to pedestrians and cyclists
- The Masterplan will be developed to prioritise and support virtual mobility and sustainable travel behaviour. Streets will be designed to encourage low vehicle speeds, and high quality walking and cycling routes should be provided throughout;
- The provision of a Community Hub in a central location will be investigated as part of the Masterplan development. This could include sustainable transport measures such as public transport information and walking and cycling maps.

### Sustainable Transport Strategy

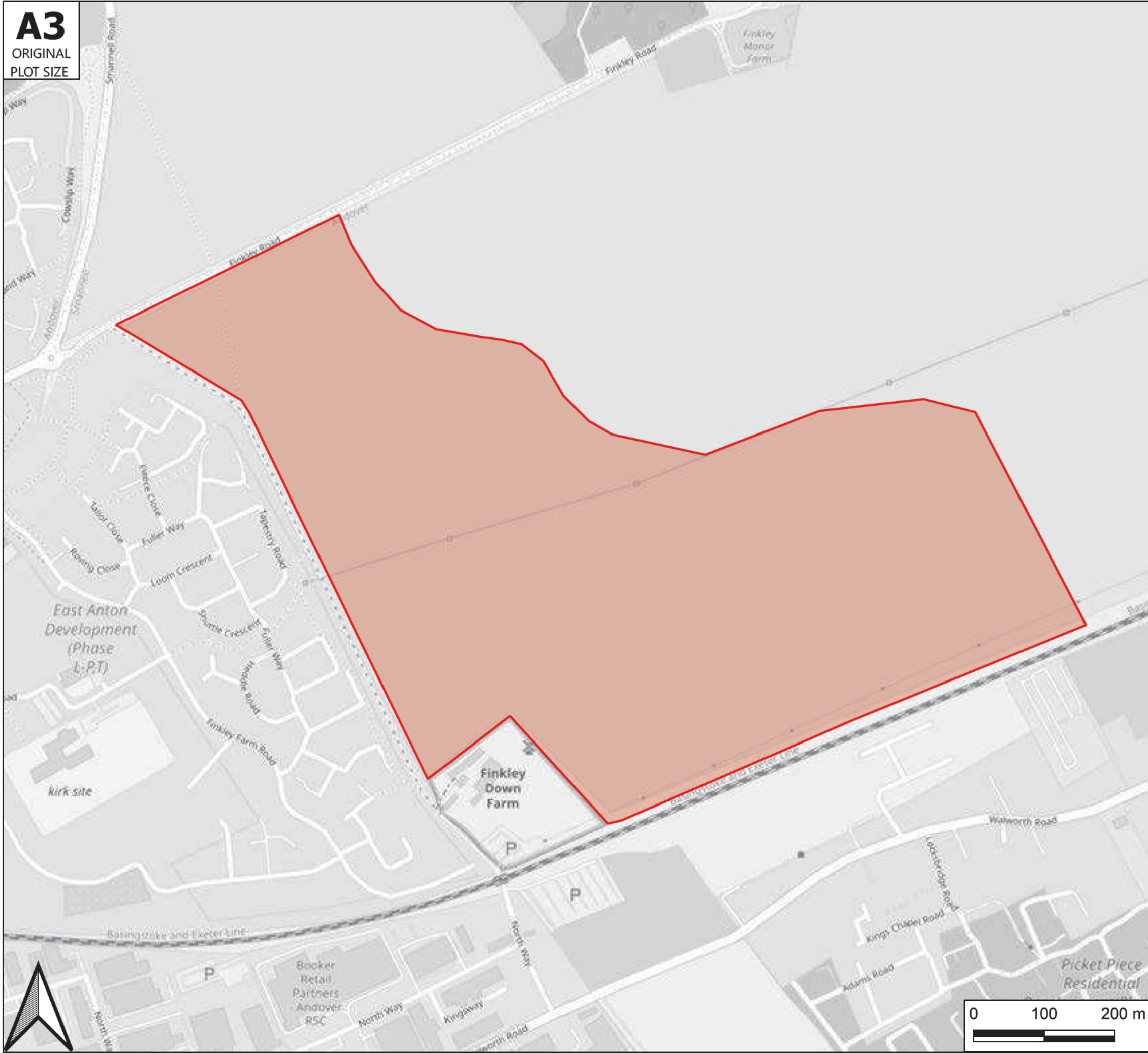
- In addition to the primary access from Finkley Road, there is the potential to provide four pedestrian and cycle access points into the Site from Augusta Park. This would create a permeable development for pedestrians and cyclists;
- The Site benefits from being located next to NCN route 246, which provides a signposted walking and cycling route to Andover Town Centre;
- To the south of the Site, North Way provides a route underneath the railway line toward Walworth Business Park. Improvements to the walking and cycling network could be provided here;
- The Applicant will work with the local highway authority and bus operator to investigate the potential for bus services to be extended into the Site, via a new bus loop with bus priority sections;
- All residents will have access to an electric vehicle charging point;
- The Applicant will implement a robust Travel Plan;

- Other measures that will be explored include:
  - Travel vouchers for use on public transport
  - Real time information provision; and
  - Vouchers to spend on walking and cycling equipment;
  - Bicycle and Scooter hire scheme (including e-bicycles and e-scooters);
  - Car Clubs
  - Personalised Travel Planning and MyPTP; and
  - A Liftshare Scheme.

11.4 This Transport Strategy is an evolving document, which will be developed through discussions with the local authorities, public transport operators, the local community and other stakeholders.

# Figures

**A3**  
ORIGINAL  
PLOT SIZE





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**Key**

Site Boundary

| Rev | Date | Details | Drawn by | Checked by | Approved by |
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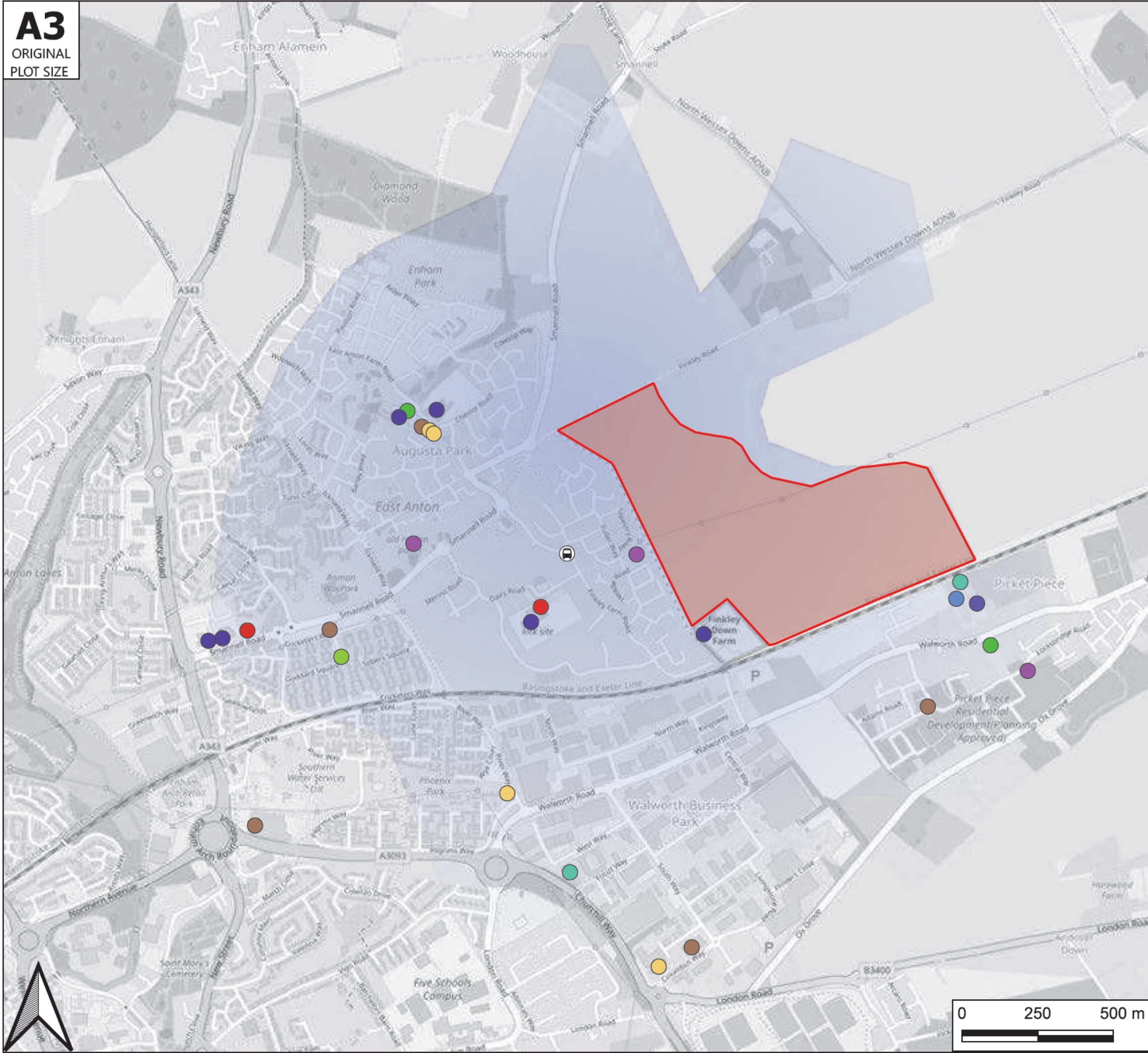
CLIENT:  
**Taylor Wimpey Strategic Land**

PROJECT:  
**Finkley Down Farm, Andover**

TITLE:  
**Site Location Plan**

STATUS:  
**FOR INFORMATION**

|                     |                   |                           |                |                 |
|---------------------|-------------------|---------------------------|----------------|-----------------|
| SCALE:<br>NTS       | DATE:<br>18/08/22 | DRAWN:<br>AC              | CHECKED:<br>RR | APPROVED:<br>JD |
| JOB NO:<br>2203-022 |                   | DRAWING NO:<br>Figure 1.1 |                | REVISION:<br>-  |




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### Key

- Site Boundary
- 20-minute Walking Isochrone
- Bus Stop
- Community
- Food Store
- Hairdresser
- Hospitality
- Medical Facility
- Outdoor Space
- Place of Religion
- Post Office
- School
- Sport/Leisure Centre

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tpa  
Transport Planning Associates

CLIENT:  
Taylor Wimpey Strategic Land

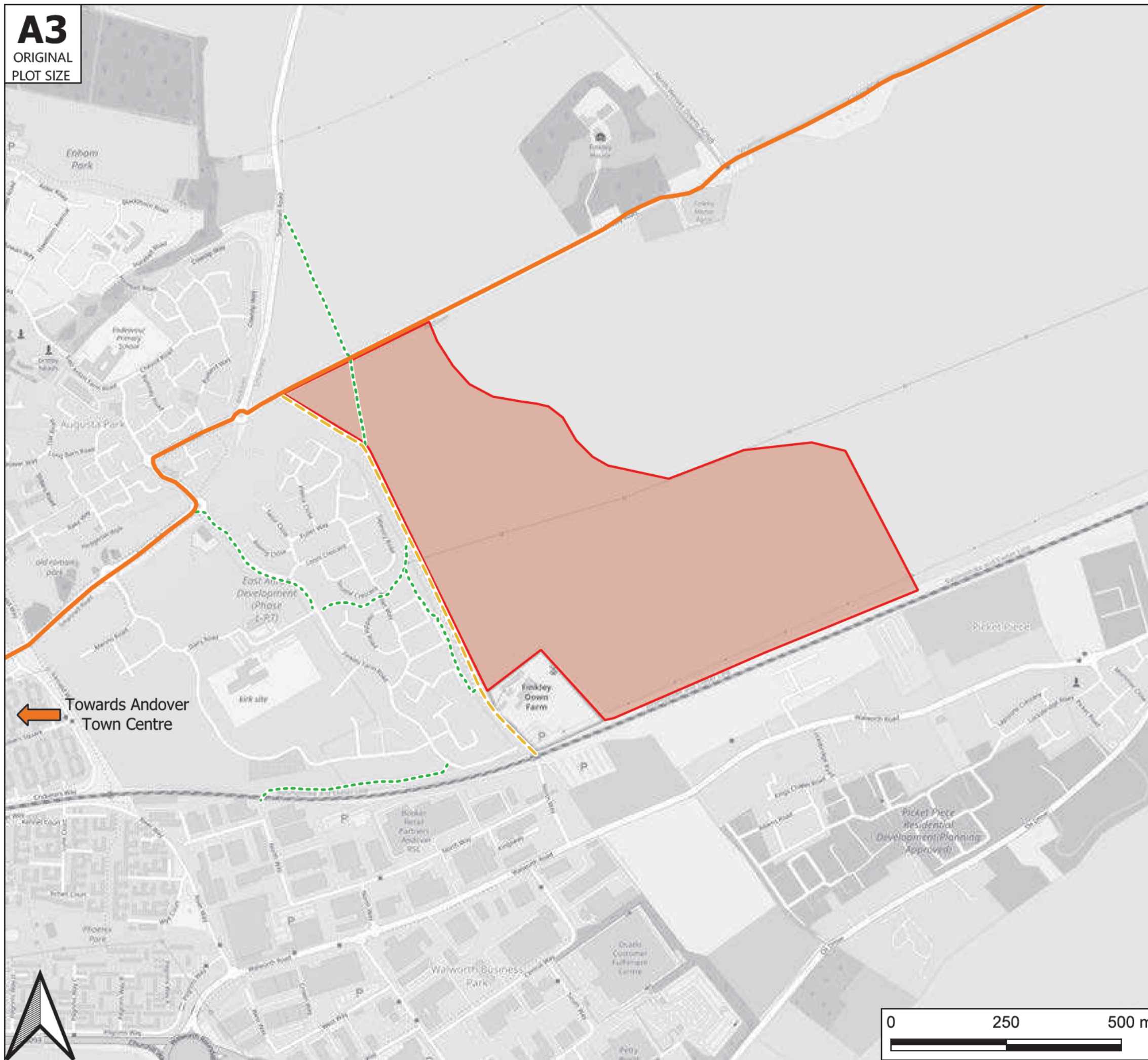
PROJECT:  
Finkley Down Farm, Andover

TITLE:  
Facilities and Amenities

STATUS:  
**FOR INFORMATION**

| SCALE: | DATE:    | DRAWN: | CHECKED: | APPROVED: |
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| NTS    | 18/08/22 | AC     | RR       | JD        |

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| 2203-022 | Figure 2.1  | -         |



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**Key**

- Site Boundary
- NCN Route 246
- Public Rights of Way
- Footpath
- Restricted Byway

| Rev | Date | Details | Drawn by | Checked by | Approved by |
|-----|------|---------|----------|------------|-------------|
|     |      |         |          |            |             |



tpa  
Transport Planning Associates

CLIENT:  
Taylor Wimpey Strategic Land

PROJECT:  
Finkley Down Farm, Andover

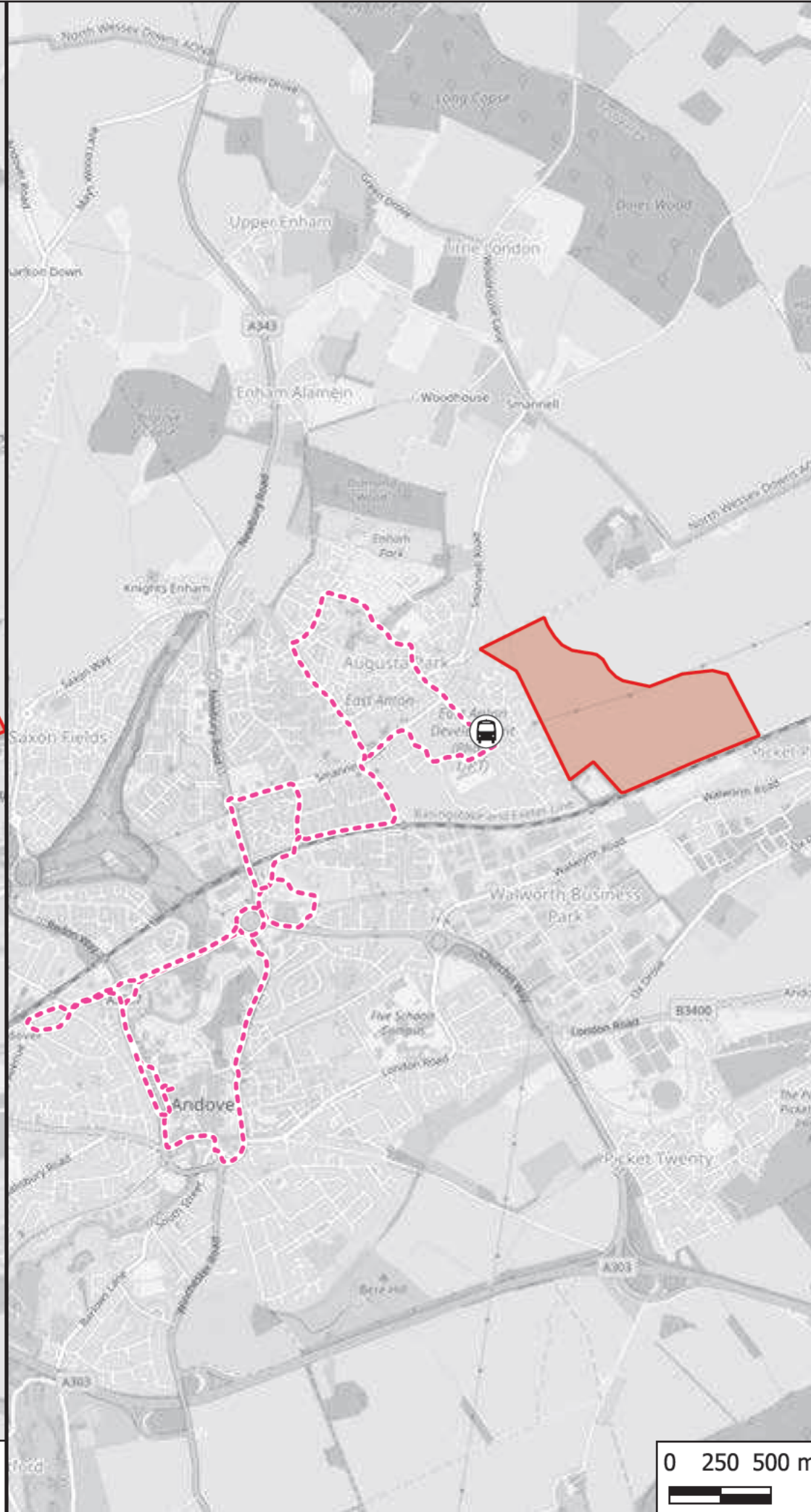
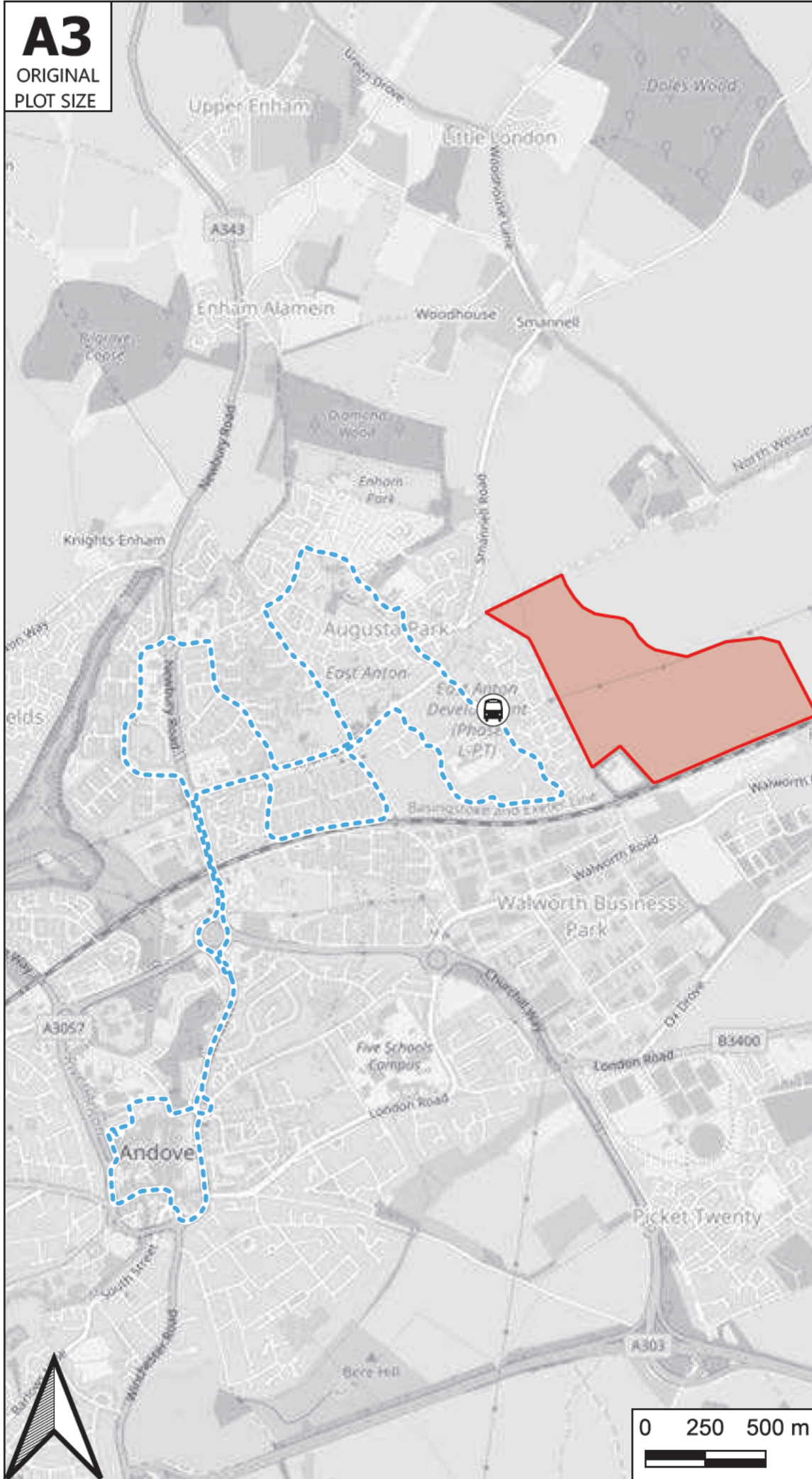
TITLE:  
Walking and Cycling Routes

STATUS:  
**FOR INFORMATION**

| SCALE: | DATE:    | DRAWN: | CHECKED: | APPROVED: |
|--------|----------|--------|----------|-----------|
| NTS    | 18/08/22 | AC     | RR       | JD        |

| JOB NO:  | DRAWING NO: | REVISION: |
|----------|-------------|-----------|
| 2203-022 | Figure 2.2  | -         |

0 250 500 m



Reproduced from .....

**Key**

- Site Boundary
- Bus Services
  - 1
  - 6
- Nearest Existing Bus Stop

| Rev | Date | Details | Drawn by | Checked by | Approved by |
|-----|------|---------|----------|------------|-------------|
|     |      |         |          |            |             |



CLIENT:  
**Taylor Wimpey Strategic Land**

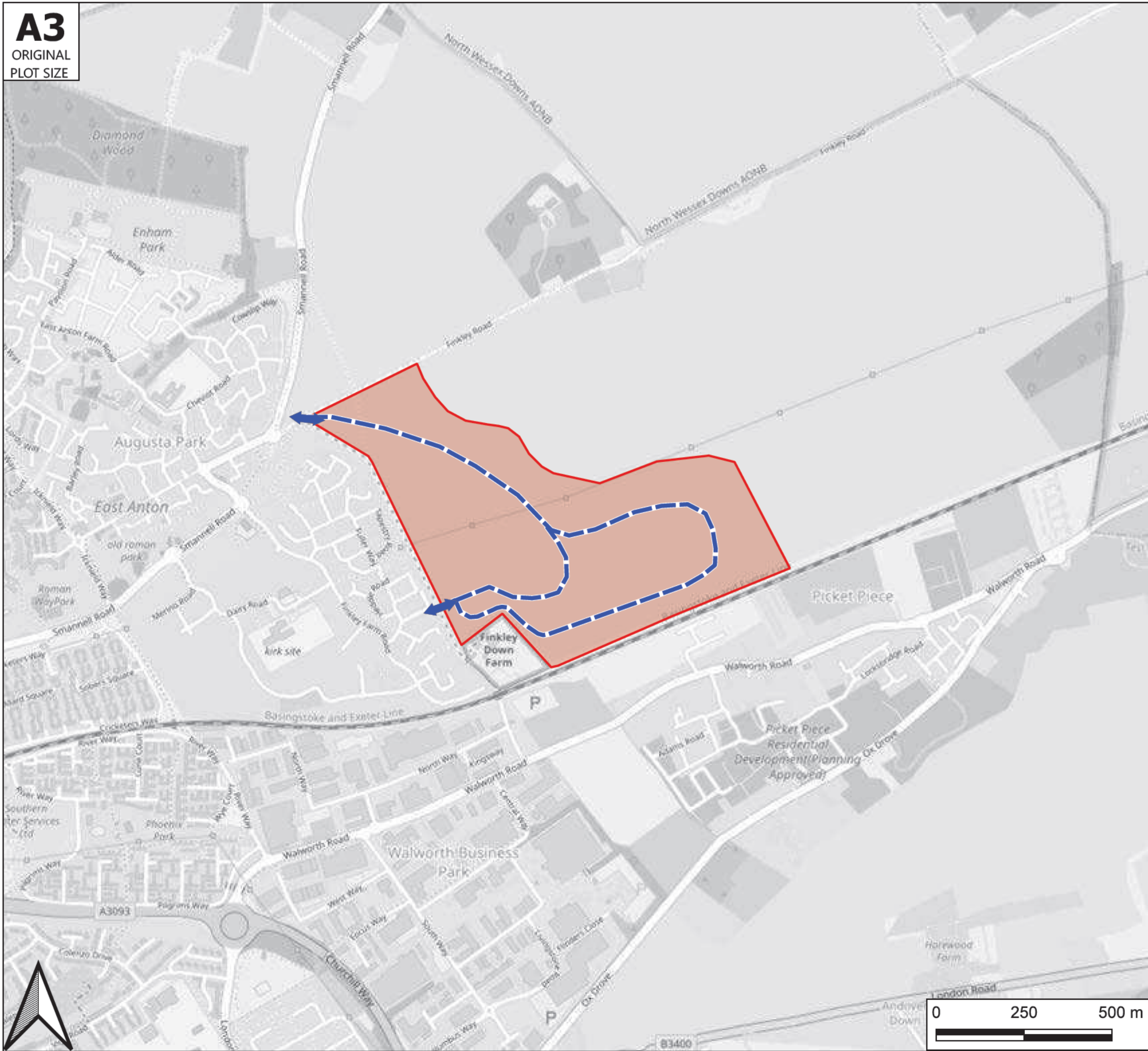
PROJECT:  
**Finkley Down Farm, Andover**

TITLE:  
**Local Bus Services**

STATUS:  
**FOR INFORMATION**

| SCALE: | DATE:    | DRAWN: | CHECKED: | APPROVED: |
|--------|----------|--------|----------|-----------|
| NTS    | 18/08/22 | AC     | RR       | JD        |

| JOB NO:  | DRAWING NO: | REVISION: |
|----------|-------------|-----------|
| 2203-022 | Figure 2.3  | -         |



Reproduced from .....

Key

Site Boundary

Vehicle Access

Indicative Vehicle Access Route

|     |      |         |          |            |             |
|-----|------|---------|----------|------------|-------------|
|     |      |         |          |            |             |
| Rev | Date | Details | Drawn by | Checked by | Approved by |
|     |      |         |          |            |             |

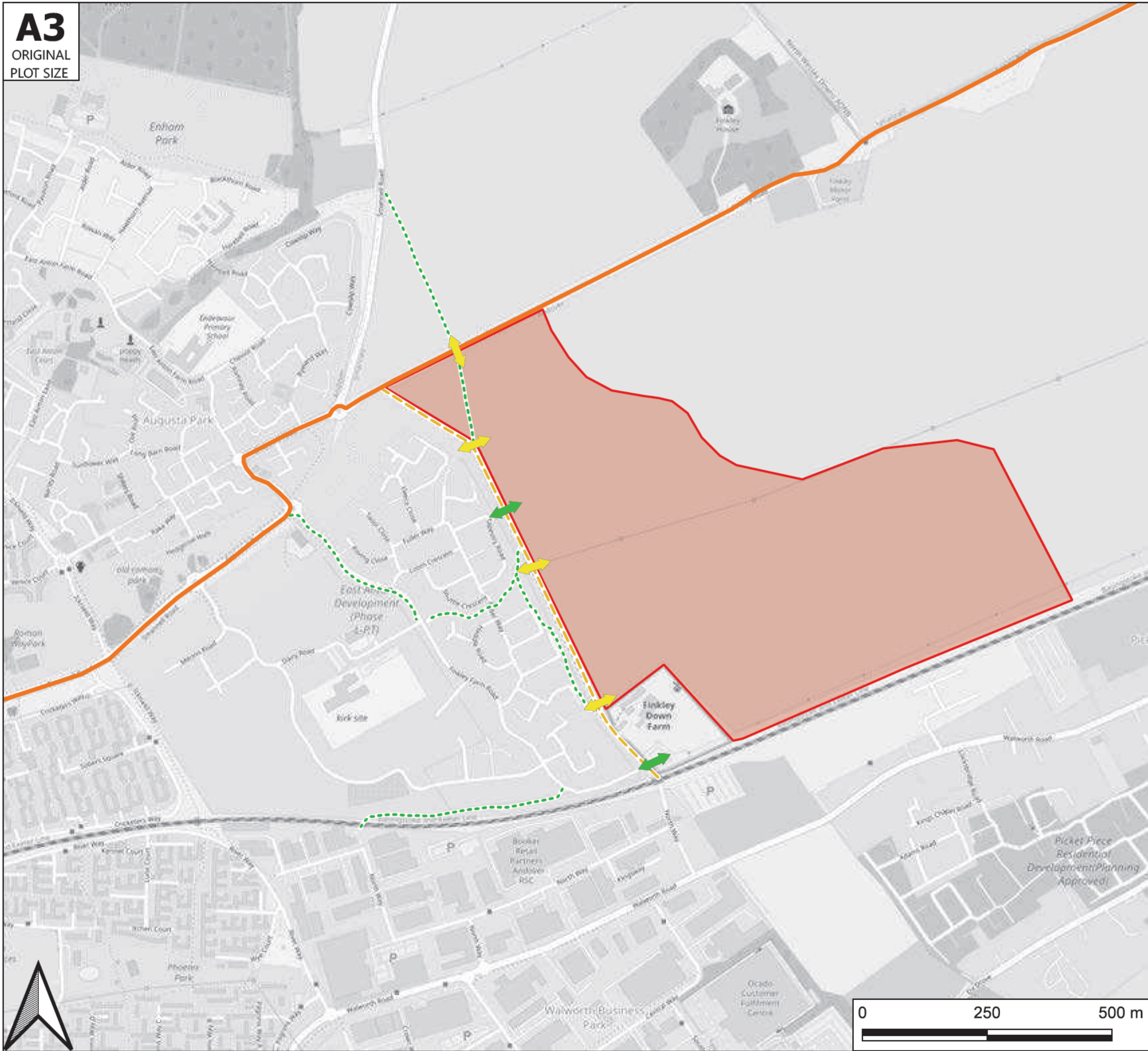
CLIENT:  
Taylor Wimpey Strategic Land

PROJECT:  
Finkley Down Farm, Andover

TITLE:  
Vehicle Access Strategy

STATUS:  
FOR INFORMATION

|                     |          |                           |          |                |
|---------------------|----------|---------------------------|----------|----------------|
| SCALE:              | DATE:    | DRAWN:                    | CHECKED: | APPROVED:      |
| NTS                 | 18/08/22 | AC                        | RR       | JD             |
| JOB NO:<br>2203-022 |          | DRAWING NO:<br>Figure 7.1 |          | REVISION:<br>- |




Reproduced from .....

**Key**

- Site Boundary
- Potential Emergency, Pedestrian and Cyclist Access
- Pedestrian Only Links
- NCN Route 246
- PRoWs
- Public Bridleway

| Rev | Date | Details | Drawn by | Checked by | Approved by |
|-----|------|---------|----------|------------|-------------|
|     |      |         |          |            |             |



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CLIENT:  
**Taylor Wimpey Strategic Land**

PROJECT:  
**Finkley Down Farm, Andover**

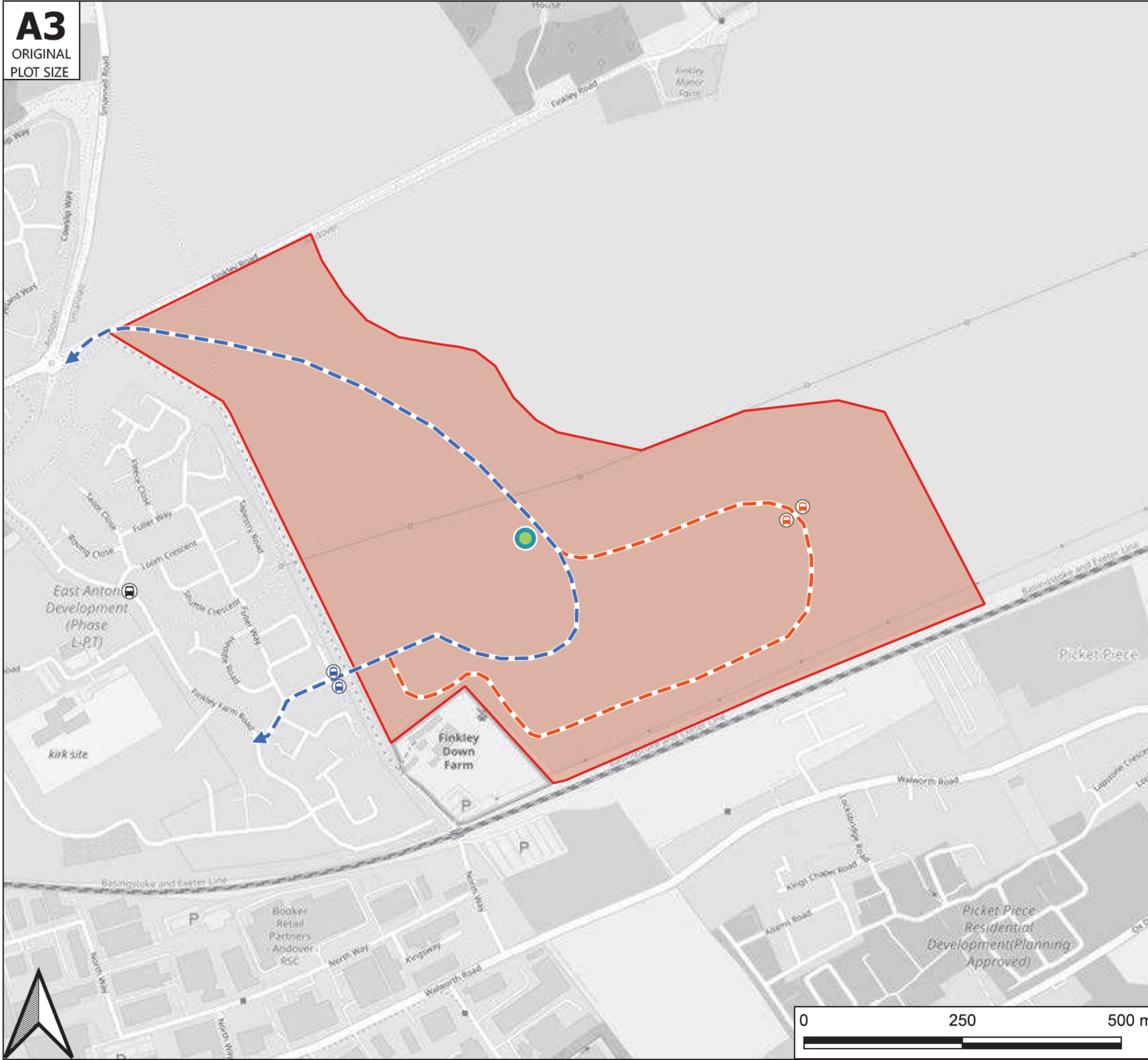
TITLE:  
**Walking and Cycling Access Strategy**

STATUS:  
**FOR INFORMATION**

| SCALE: | DATE:    | DRAWN: | CHECKED: | APPROVED: |
|--------|----------|--------|----------|-----------|
| NTS    | 18/08/22 | AC     | RR       | JD        |

| JOB NO:  | DRAWING NO: | REVISION: |
|----------|-------------|-----------|
| 2203-022 | Figure 8.1  | -         |

**A3**  
ORIGINAL  
PLOT SIZE



Reproduced from .....

Key

Site Boundary

Proposed Mobility Hub

Phase 1 Bus Route


Phase 2 Bus Route

Phase 1 Bus Stops

Phase 2 Bus Stops

Existing Bus Stop

|     |      |         |          |            |             |
|-----|------|---------|----------|------------|-------------|
| Rev | Date | Details | Drawn by | Checked by | Approved by |
|     |      |         |          |            |             |

  
Transport Planning Associates

CLIENT:  
Taylor Wimpey Strategic Land

PROJECT:  
Finkley Down Farm, Andover


TITLE:  
Bus Access Strategy

STATUS:  
**FOR INFORMATION**

|        |          |        |          |           |
|--------|----------|--------|----------|-----------|
| SCALE: | DATE:    | DRAWN: | CHECKED: | APPROVED: |
| NTS    | 18/08/22 | AC     | RR       | JD        |

|          |             |           |
|----------|-------------|-----------|
| JOB NO:  | DRAWING NO: | REVISION: |
| 2203-022 | Figure 9.1  | -         |

0250500 m



# APPENDIX A



- 0 50 100 metres
- Illustrative masterplan boundary**
- Wider landholding**
- Existing:**
- Trees
  - Hedgerows
  - Arable land
  - Archaeological Finds
- Phasing**
- Phase 1
  - Phase 2
  - Phase 3
- Development Areas**
- Development parcels
- Proposals**
- Bus route - Phase 1
  - Bus route - Phase 2
  - Bus stop and 300m isochrone
  - Potential econdary access point for emergency vehicles, pedestrians and cyclists
  - Shared vehicular/pedestrian space
  - Equipped childrens play areas
  - Neighbourhood Equipped Area for Play
  - Pedestrian only links
  - Structural planting
  - Open space
  - School
  - Infiltration Basin as part of SuDs Strategy
  - Potential future access points

LANDUSE BUDGET FOR LAND EAST OF BRIDLEWAY WITHIN ILLUSTRATIVE MASTERPLAN

|                              |           |
|------------------------------|-----------|
| Illustrative masterplan area | 64.30 Ha  |
| 2 FE Primary School          | 2.00 Ha*  |
| Net residential              |           |
| Phase 1:                     | 12.52 Ha  |
| Phase 2:                     | 12.44 Ha* |
| Phase 3:                     | 14.57 Ha  |
|                              | 39.53 Ha  |

\* 2 FE Primary School Site (2.00 Ha) not included in Phase 2 net residential area.

|     |          |    |                      |
|-----|----------|----|----------------------|
| B   | 30.05.22 | RC | BNG area amended     |
| A   | 24.05.22 | SM | Access point amended |
| Rev | Date     | By | Description          |

**CSA**  
environmental

Project: Finkley Down Farm, Andover

Title: Illustrative Masterplan

Client: Taylor Wimpey UK Ltd

Scale: 1:2500 @ A1 Drawn: MM

Date: May 2022 Checked: CS



Drawing No. CSA/1845/123 Rev: B

# APPENDIX B

NOTES:

1. The extent of adopted highway has been taken from an unscaled Ordnance Survey based highway record plan received from Hampshire County Council on 6th May 2022 and is indicative only. The route of the restricted byway has been taken from the same plan.

KEY

-  Approximate extent of adopted highway maintainable at public expense by Hampshire County Council.
-  Existing restricted byway.

Potential location for a gateway feature,  
exact location and details to be agreed.

| Rev | Date | Details | Drawn by | Checked by | Approved by |
|-----|------|---------|----------|------------|-------------|
|     |      |         |          |            |             |



CLIENT:  
**TAYLOR WIMPEY**

PROJECT:  
**FINKLEY DOWN FARM,  
ANDOVER**

TITLE:  
**Proposed Site Access  
Arrangement - Option 1**

STATUS:  
**FEASIBILITY**

|                     |                     |               |                |                 |
|---------------------|---------------------|---------------|----------------|-----------------|
| SCALE:<br>1:500     | DATE:<br>06.05.22   | DRAWN:<br>PSW | CHECKED:<br>JD | APPROVED:<br>JD |
| JOB NO:<br>2203-022 | DRAWING NO:<br>SK01 | REVISION:     |                |                 |





INDICATIVE

RESERVED COPYRIGHT

NOTES:

1. The extent of adopted highway has been taken from an unscaled Ordnance Survey based highway record plan received from Hampshire County Council on 6th May 2022 and is indicative only. The route of the restricted byway has been taken from the same plan.

KEY

-  Approximate extent of adopted highway maintainable at public expense by Hampshire County Council.
-  Existing restricted byway.

Potential location for a gateway feature,  
exact location and details to be agreed.

| Rev | Date | Details | Drawn by | Checked by | Approved by |
|-----|------|---------|----------|------------|-------------|
|     |      |         |          |            |             |



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CLIENT:  
**TAYLOR WIMPEY**

PROJECT:  
**FINKLEY DOWN FARM,  
ANDOVER**

TITLE:  
**Proposed Site Access  
Arrangement - Option 2**

STATUS:  
**FEASIBILITY**

|                     |                     |               |                |                 |
|---------------------|---------------------|---------------|----------------|-----------------|
| SCALE:<br>1:500     | DATE:<br>06.05.22   | DRAWN:<br>PSW | CHECKED:<br>JD | APPROVED:<br>JD |
| JOB NO:<br>2203-022 | DRAWING NO:<br>SK02 | REVISION:     |                |                 |



INDICATIVE

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# Vision for Finkley Down Farm, Andover

August 2022

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## Context

The proposed development at Finkley Down Farm will provide a natural extension to the neighbouring Augusta Park Development, which is in the final stages of being built out. That development provides a wide range of community facilities, that are within easy walking and cycling distance of the proposed development. Immediately to the south of the site there is also a major employment area that is similarly in easy walking distance.

## Responding to the Local Environment

The proposed development has been crafted to respond to the underlying topography of the site and boundary vegetation. The greater part of the eastern boundary is formed by an established hedgerow. Beyond the hedgerow the land continues rises to a local high point, approximately  $\frac{3}{4}$  kilometre northeast of the site. The southern part of the site gently falls to the railway line. The development envelope responds to the underlying topography in a sensitive manner, with the higher land, to the northeast, retained in agricultural use.

## Development with a Strong Sense of Place

One of the key objectives in designing the layout has been to create a neighbourhood that relates well to Augusta Park, but equally has a strong sense of place in its own right. This has been achieved by:

- Creating a new community of approximately 1,450 dwellings which will have a range of property types, to cater for people of all ages, and an appropriate level of affordable housing.
- A 2 hectare primary school site.
- Generous areas of open space.

At the heart of the new neighbourhood are the playing fields and the primary school. A series of linear green spaces have been created to punctuate the development and to provide strong, attractive pedestrian links to Augusta Park and the swathe of parkland that borders the eastern boundary of the site.

New woodland planting will be provided alongside the railway, to screen the track, and a linear area of open space will be created along this boundary.

The open space will accommodate SuDS features which will provide a sustainable solution to drainage and which will have the added benefit of encouraging wildlife into the area.

### **Green Infrastructure**

The site comprises a single arable field and part of a neighbouring field. Other than a single hedgerow, that bounds the eastern field, there is no other vegetation within the body of the site that would constrain development.

The proposed masterplan has been landscape led and makes generous provision for new planting. A significant landscape buffer, incorporating areas of parkland and new woodland planting, will be established alongside the boundary with the open countryside to ensure that a robust and attractive boundary is created. This will not only bring landscape benefits but will also allow new wildlife habitats to be created, which will result in an overall nett gain in biodiversity.

The development will have a verdant character, which will relate well to the neighbouring countryside and provide a wide range of passive and recreational facilities. These facilities include:

- A large area of playing fields and an associated pavilion, at the heart of the development.
- Community allotments.
- Play areas for both youths and younger children.
- Informal areas of parkland for passive recreation.

### **Access and Circulation**

Pedestrian, cycle and easy access to public transport, has been prioritised in shaping the layout. Housing has been oriented to overlook these key routes so that people will feel safe to use them, by day or night. The footpath network also provides direct links to the Local Centre and Primary School site in Augusta Park. There are also recreational footpaths passing through the parkland on the periphery of the development and in the vegetated corridors that run through it.

The main point of vehicular access is from a new junction on Finkley Road, with a vehicular link at the southern part of the western boundary, to Skein Road. The internal round network has been designed to create a bus route that runs through the development, with the bus passing the Primary School and being within walking distance of all the properties. The bus route will be tree lined, as will many of the other roads in the development.

## **Biodiversity Net Gain Feasibility Study**

Finkley Down Farm, Andover August, 2022

---

*This technical note has been prepared by CSA Environmental on behalf of Taylor Wimpey UK Ltd in relation to Finkley Down Farm, Andover (hereafter referred to as 'the Site'). It concerns the Site's ability to accommodate residential development while delivering Biodiversity Net Gain.*

### **1.0 Introduction**

- 1.1 This technical note presents the findings of an initial appraisal made of the projected biodiversity gains and losses associated with development at the Site, which is promoted for allocation for residential use under the emerging Test Valley Local Plan 2040.
- 1.2 The Site occupies an area of c. 64.3ha and is located around central grid reference SU 385 476, to the north-west of Andover. It consists of two arable fields bounded by hedgerows and a grassland margin of varying width. The south-west corner of the Site is occupied by a leisure farm attraction with associated grassland, buildings and hardstanding (see Habitats Plan 2022 (CSA/1945/124) in Appendix A. A full appraisal of the baseline ecological conditions at the Site was provided in the Update Ecological Appraisal (CSA/1845/05; February 2018).
- 1.3 This BNG Appraisal aims to:
  - Provide an initial, illustrative classification of the type, distinctiveness, condition and strategic significance of habitats present prior to and post-development.
  - Clearly identify data collection methods and any limitations.
  - Give an indicative projection of the gains and losses of biodiversity which could reasonably be expected to result from development of the Site.
  - Identify opportunities for off-site habitat creation to offset any net loss of habitat units on-site.

### **2.0 Legal and Policy Context**

- 2.1 The UK central Government's intention is to introduce a mandatory requirement of a minimum 10% biodiversity net gain as a condition of all planning and development in England under the Environment Act 2021. The relevant provisions of the Act are projected to come into force in November 2023.

- 2.2 The National Planning Policy Framework (2021) (NPPF) sets out existing government planning policies for England and how they should be applied. Chapter 15: Conserving and Enhancing the Natural Environment, paragraph 174, states that the planning system and planning policies should minimise impacts on and provide net gains for biodiversity. Paragraph 180 sets out the principles that local planning authorities should apply when determining planning applications. These include:
- If significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts).
  - Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused.
  - Development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.
- 2.3 Accompanying the NPPF, central government guidance on the implementation of planning policies is set out within online Planning Practice Guidance (PPG). That relating to the protection and enhancement of the Natural Environment was most recently updated in August 2021. The Natural Environment PPG addresses principles across a broad spectrum of topics targeting biodiversity conservation, from individual site and species protection through to the supporting of ecosystem services, and the use of local ecological networks to support the national Nature Recovery Network. In particular the PPG promotes the delivery of measurable biodiversity net gain through the creation and enhancement of habitats alongside development.
- 2.4 Locally, Policy E5 of the existing Test Valley Borough Council Revised Local Plan 2011-2029 (Test Valley Borough Council, 2016) states that development in the borough should conserve and, where possible, restore and enhance biodiversity. The Draft Local Plan 2040 Regulation 18 Stage 1 makes reference to delivery of biodiversity net gain, though doesn't quantify a target (e.g. 10%). It does however state that, *"There will be lots of legislation that evolves as a result of this Act which the Local Plan 2040 will need to be in accordance with. We have not included strategic policies on environmental matters at this stage of the Local Plan 2040 to reflect the need to appropriately take account of this recent Act and emerging legislation."*

- 2.5 In light of the emerging legal requirement, which will likely be mirrored by emerging policy, it would be appropriate for development at the Site to target a minimum of 10% biodiversity net gain.

### **3.0 Biodiversity Net Gain: Good Practice Principles**

- 3.1 Biodiversity net gain has been defined as 'development that leaves biodiversity in a better state than before, and an approach where developers work with local governments, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation' (Baker, 2016).
- 3.2 Good practice principles for biodiversity net gain are set out within Table 1.1 of Biodiversity Net Gain: Good practice principles for development (Baker *et al.*, 2019). Key principles include:
- Apply the 'Mitigation Hierarchy' (in line with CIEEM Guidelines for Ecological Impact Assessment (EclA) (CIEEM, 2018) and be 'additional' by achieving outcomes that exceed existing obligations.
  - Avoid losing biodiversity which cannot be off-set elsewhere (e.g. irreplaceable habitats).
  - Address risk (e.g. difficulty of achieving habitat creation / enhancement for net gain).
  - Make a 'measurable' net gain contribution (e.g. calculated using an appropriate metric) and ensure that calculations consistent and transparent (i.e. limitations and assumptions are clearly identified).
  - Ensure that net gain design achieves the best outcome for biodiversity (this may require both quantitative and qualitative assessment) and create a net gain legacy for long-term benefits.

### **4.0 Methods**

- 4.1 This assessment has been informed by an extended Phase 1 Habitat Survey (JNCC, 1990) of the Site undertaken as part of an Update Ecological Appraisal (UEA), in addition to a desktop study for relevant habitat and / or strategic nature conservation designations. Full results of this UEA are provided within the UEA Report (CSA/1845/05). The farm attraction located in the south-west corner of the Site was not included in the UEA so habitats have been measured indicatively using aerial imagery.
- 4.2 The Biodiversity Metric 3.1 (Panks *et al.*, 2022) was used to calculate the change in biodiversity units (including 'Habitat' units and liner 'Hedgerow') and the overall percentage of gain/loss achieved.

- 4.3 Pre-development baseline and proposed habitat areas were measured as distinct habitat parcels. The pre-development habitat areas baseline was calculated using measurements taken from the Habitats Plan (CSA/1845/124, Appendix A) and aerial imagery. Hedgerows and tree lines were included as linear habitats only. Baseline habitat condition of hedgerows and grassland were estimated based on aerial imagery, Site photographs and descriptions provided in the UEA.
- 4.4 Post-development habitats were calculated from the Illustrative Masterplan (CSA/1845/123/Rev B) as shown in the Post-Development Habitats Plan (CSA/1845/125/Rev A; Appendix B). Given the conceptual nature of the plan, reasonable assumptions have been made in regard to habitat creation which are as follows:
- Residential parcels will have an approximate 70/30% split between sealed surface development and vegetated garden.
  - Public Open Space (POS) will be approximately divided into 40% Modified Grassland, 30% Other Broadleaved Woodland, 20% Other Neutral Grassland and 10% Mixed Scrub.
  - The area indicated as the proposed school will be comprised entirely of developed land.
  - All created habitats, where applicable, will reach 'Moderate' condition (a measure which can be thought of as their relative 'quality').

## **5.0 Results**

- 5.1 Based on the Biodiversity Metric 3.1 calculations, development within the red line, as shown within the Illustrative Masterplan, could be expected to result in a net gain of 3.85 Habitat Units (equating to 3.05%). Such a result would comply with existing local and national policy, but falls short of the 10% forthcoming legal requirement (which is additionally likely to be reflected in final Local Plan 2030).
- 5.2 The metric also indicates that development would result in a net loss of 1.48 Hedgerow Units (-7.11%) due to the facilitation of vehicular and pedestrian access within the Site. However, no soft landscape proposals have yet been created for the Site, and in reality, it will be straightforward to secure a net gain in these linear units, as treelines and ornamental hedgerows are expected to be incorporated at the detailed design stage.
- 5.3 In view of the above, land within the wider holding has been set aside for the proposed scheme to achieve a higher level of biodiversity net gain. This 2.7ha area, which is identified on the Illustrative Masterplan as a linear swathe along the northern boundary, will be converted from Cropland to Other Neutral Grassland in 'moderate' condition. This will yield an additional 12.68 Habitat Units. With the inclusion of this off-site

land, the proposed development would achieve an overall net gain of 16.53 Habitat Units, equating to 13.08%.

- 5.4 It can be concluded that, under the current Illustrative Masterplan (CSA/1845/123/Rev B), biodiversity net gain is achievable at the Site to a level greater than 10%, which is consistent with emerging legal and policy requirements.

## 6.0 References

Baker, J., 2016. *Biodiversity Net Gain: Good practice principles for development*. CIEEM, CIRIA & IEMA.

Baker J., Hoskin, R. & Butterworth, T. (2019). *Biodiversity Net Gain: Good Practice Principles for Development. A practical guide*. CIEEM, CIRIA & IEMA.

Joint Nature Conservation Committee, 1990. *Handbook for Phase 1 habitat survey – a technique for environmental audit*. Revised reprint 2010. Peterborough: JNCC.

Ministry of Housing, Communities and Local Government, 2019. *National Planning Policy Framework (NPPF)*. London: Ministry of Housing, Communities and Local Government.







Panks, S., White, N., Newsome, A., Nash, M., Potter, J., Heydon, M., Mayhew, E., Alvarez, M., Russel, T., Cashon, C., Goddard, F., Scott, S.J., Heaver, M., Scott, S. H., Treweek, J., Butcher, B. and Stone, D., 2022. *Biodiversity Metric 3.1: Auditing and Accounting for Biodiversity – User Guide*. Natural England.

Test Valley Borough Council, 2016. *Test Valley Borough Council Revised Local Plan 2011-2029*. [online] Available at: <<https://www.testvalley.gov.uk/assets/attach/2446/Adopted-Local-Plan-2011-2029.pdf>> [accessed May 2022].

## **Appendix A**

Habitats Plan (CSA/1845/124)



-  Site boundary
-  Additional landholding
-  Cropland
-  Modified grassland
-  Developed land
-  Hedgerow

0 90 180 270 360 450metres



**Project** Finkley Down Farm, Andover

**Date** May 2022

**Drawing No.** CSA/1845/124

**Drawing Title** Baseline Habitats Plan

**Scale** Refer to scale

**Rev** -

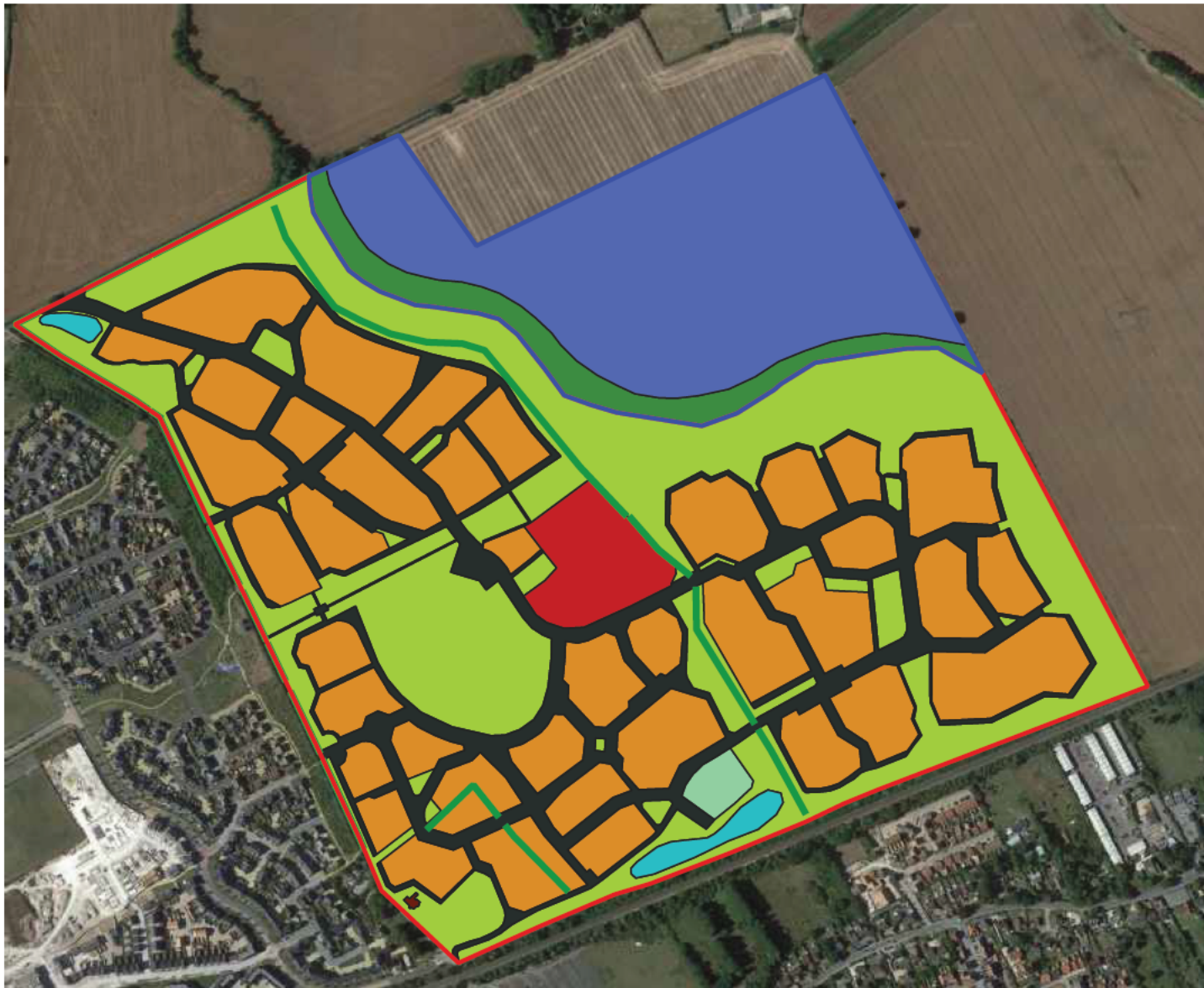
**Client** Taylor Wimpey

**Drawn** SV

**Checked** MR

## **Appendix B**

Post-development Habitats Plan (CSA/1845/125/Rev A)



- Development area
- Wider landholding
- Residential (70% developed land; 30% gardens)
- Public Open Space mosaic
- Wider landholding (retained cropland)
- Developed land; sealed surface (roads)
- Developed land; sealed surface (school)
- Allotments
- SuDS feature
- Land for BNG
- Developed land; sealed surface (retained)
- Retained hedgerow



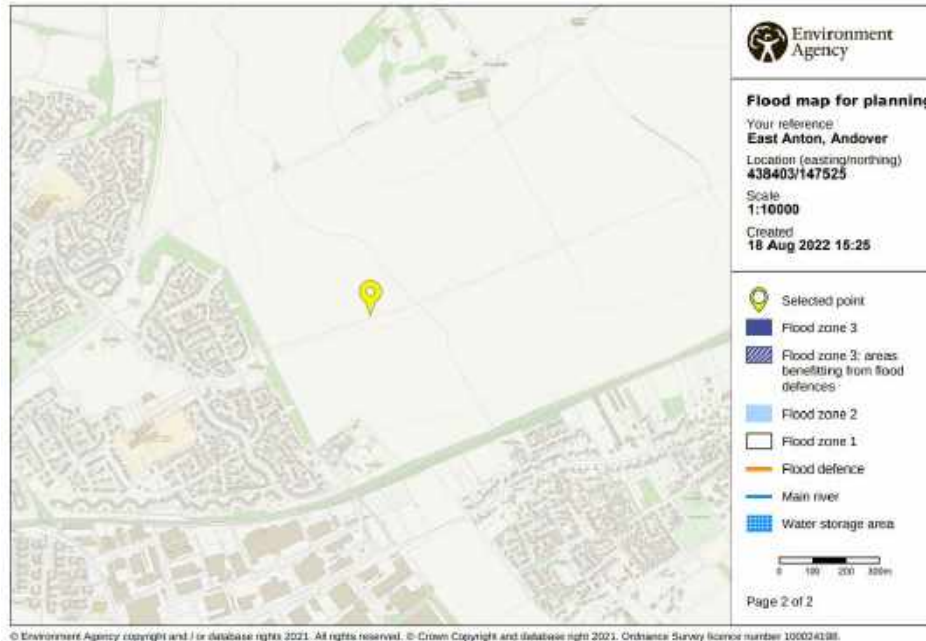
## **Appendix C**

Biodiversity Metric

Please find accompanying.

## 1. Flood Risk:

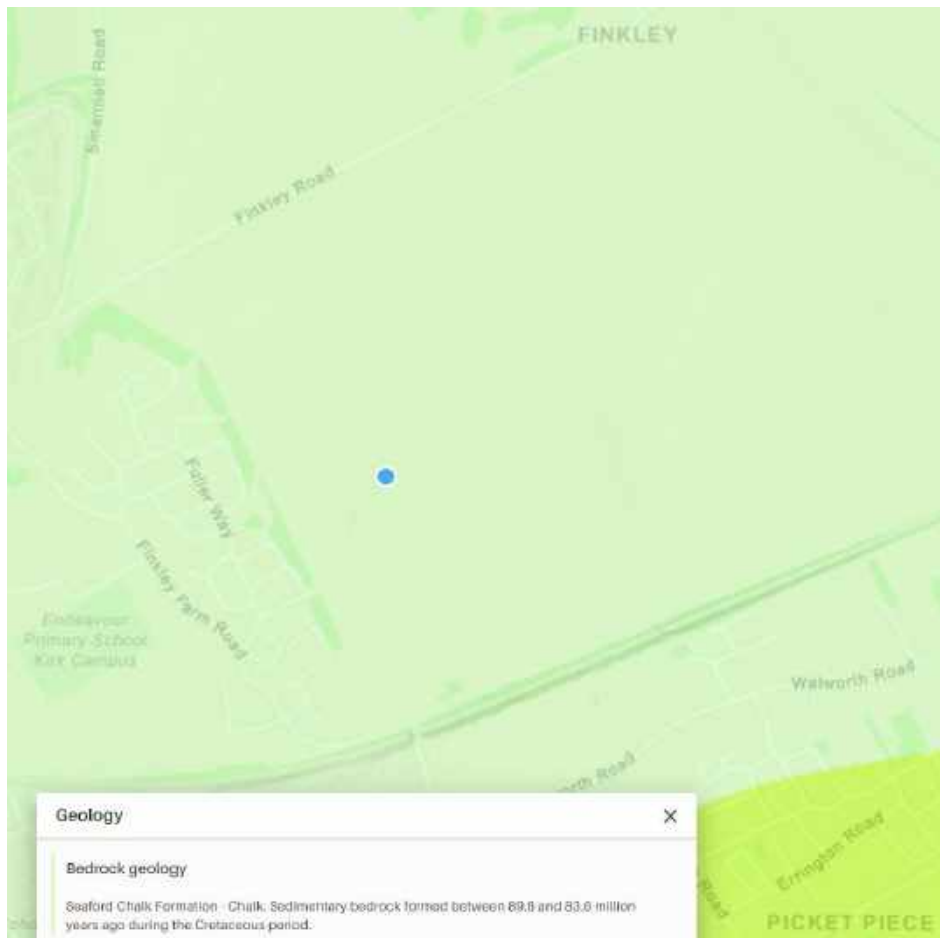
- 1.1. The Environment Agency Flood Map for Planning shows the site to be entirely within Flood Zone 1 having less than 0.1% (1:1,000) annual probability of pluvial or fluvial flooding.



- 1.2. The Environment Agency Risk of Flooding from Surface Water mapping shows two small areas of risk along the southern boundary with the railway. Surface water flood risk will be managed on site using a Sustainable Drainage System (SuDS).



- 1.3. The underlying bedrock geology is permeable chalk flooding from groundwater is therefore unlikely.



- 1.4. There are no artificial sources within the vicinity of the site that would result in flood risk.
- 1.5. Overall, the site is at low risk of flooding from all sources.

## **2. Surface Water Drainage:**

- 2.1. The underlying bedrock is a permeable chalk. Ground investigation for the existing East Anton development immediately to the west shows that the chalk is suitable for the use of infiltration. The geology for the two sites is shown to be the same (Seaford Chalk Formation).
- 2.2. Infiltration based SuDS will be used to dispose of surface water runoff from the proposed development as the existing East Anton development immediately to the west.
- 2.3. The SuDS will comprise of infiltration features such as basins, swales, soakaways, permeable/porous surfaces, etc.

**3. Foul Sewage:**

- 3.1. The foul drainage for the proposed development will connect to the existing Southern Water Foul Sewerage Infrastructure.

# Building a better world

Environment Strategy 2021



# From our CEO

## At Taylor Wimpey we aim to build great homes and thriving communities.

We're proud to create places that will be enjoyed by generations of people for decades and even centuries to come. Yet today we recognise that future generations face an uncertain future – our planet is in trouble.

### A crisis we can't ignore

From climate change to biodiversity loss, the scale of the environmental crisis has never been more apparent. Global temperatures are rising, ecosystems are breaking down and our wild places are littered with plastic waste. We are seeing these changes happen in front of our eyes and the science tells us that we all need to act and to act quickly.

We want to be part of the solution.

### Building a better world

With the launch of our environmental strategy we will play our part in creating a greener, healthier future for our customers, colleagues and communities.

We will join the global fight to stop climate change, improve access to and enjoyment of nature for our customers, and use fewer and more sustainable resources. We are committing to challenging targets and to working together with others to bring about change.

### What we will do

We will cut our own environmental footprint, reducing emissions and waste, conserving precious resources and regenerating the natural environment on our developments. Our ambitious science-based carbon reduction target will ensure we align our progress with the international Paris Climate Agreement.

We will engage our supply chain, influencing positive change beyond our business and reducing the significant environmental impacts associated with the goods and services we buy.

We know that people today want to live more sustainably but that this isn't always easy to do. Through the changes we make to our homes and developments, we will enable our customers to achieve their aspiration of a greener and healthier lifestyle.

### A challenge and an opportunity

Delivering our targets will be challenging and require action from every colleague across our business as well as collaboration with our peers, NGOs and government. Yet we know that it will make us a stronger business and help us to create even better places to live for our customers.

**Together we can help build a more sustainable future.**

**Pete Redfern**  
Chief Executive





## Our vision

“Our world – our home – is in trouble and we aren’t standing on the sidelines watching. We want to be part of the solution – working together to minimise the impact we have on climate change and protecting our planet for future generations. We’re committing to challenging, measurable targets based on science, to making changes in the way we work and to reducing our footprint. By thinking globally and acting locally, we will play our part to create a greener, healthier home for us all.

**Let’s build a better world together.”**

# How will our strategy benefit our business?

**Our strategy will make us a stronger business today and for the long term.**

## **It's the right thing to do**

The science is clear – we all have to act now to prevent catastrophic climate change and biodiversity loss. As a responsible business, we want to play our part in creating a sustainable future for everyone.

## **Creating great places to live**

Our environment strategy will help us meet changing customer expectations. It will see us reduce the environmental footprint of our homes and enable customers to live a greener lifestyle. By creating space for nature on our developments we will make them more attractive places to live and support our customers' physical and mental wellbeing.

Our recent customer research found that 43% of people consider the environment an important factor when choosing who to buy a new build home from with issues such as energy and water efficiency, and access to green space particular priorities. The research also showed that 42% of people were more focused on environmental issues as a result of the pandemic.

## **A great place to work**

Environmental issues matter to our colleagues. We want them to feel proud of the work we're doing to protect the environment and to have a chance to contribute. We know that a growing number of people look for jobs with purpose and prefer employers whose values they respect. Our strategy will help make us an employer of choice.

## **Meeting stakeholder expectations**

Local authorities across the UK have declared a climate emergency. They want to work with housebuilders who can help them to create sustainable places to live. Centrally, the UK Government has set a goal to have a net zero emission economy by 2050. Investors increasingly look for companies who are acting to shape a more sustainable world and mitigating environmental risks. With our strategy, we can help these stakeholders to meet their objectives.

## **Improving efficiency and reducing costs**

Many of the changes we are making will help us to operate more efficiently, use fewer resources and avoid waste. This will save our business time and money.



# What are we focusing on?

**Our strategy focuses on climate change, nature, and resources and waste. We have set ambitious quantitative targets to help drive progress in each area up to 2030.**

**Climate change** is the most urgent environmental issue for our sector. We have a significant carbon footprint through our operations and an even greater impact through the goods and services we buy and the energy used in our homes once customers move in. Our business will feel the physical impacts of a changing climate and be affected by climate change regulation. We also have an opportunity to help our customers to live a lower carbon lifestyle through the way we design our homes and developments.

**Nature** is in serious decline in many parts of the UK. Housebuilding can contribute to loss of biodiversity but by creating high quality spaces for nature on our sites we can reverse this trend. A growing body of research shows that being close to nature is good for our physical and mental health, so increasing nature on our sites will make them better places to live for our customers. Our work on biodiversity will also help us to meet changing regulatory and planning requirements.

To build our homes we use large quantities of materials and **resources** and produce significant volumes of **waste**. This comes at a cost to our business and the environment. By working with our suppliers and colleagues to cut waste and select sustainably sourced materials we can improve efficiency and reduce risks to the business.

Our approach to sustainability also encompasses work on a range of social and economic issues. You can read about these aspects, including our investment in affordable housing and our support for youth employment through apprenticeships in our Sustainability Report, [www.taylorwimpey.com](http://www.taylorwimpey.com)

## Supporting the UN Sustainable Development Goals

We've reviewed the UN Sustainable Development Goals to help us set our environmental targets. We can have most impact through our strategy on the following targets: 3.9, 6.4, 7.2, 7.3, 8.4, 11.2, 12.2, 12.5, 12.8, 13.1, 13.2, 15.2, 15.5, 15.9.



# Our targets in brief

Our strategy focuses on three key areas and will see us make changes across our operations, supply chains and customer homes.

## Building a better world

### Climate change

Defend the planet and our future by playing our part in the global fight to stop climate change.

#### Key target

Achieve our science-based carbon reduction target:

- Reduce operational carbon emissions intensity by 36% by 2025.
- Reduce carbon emissions intensity from our supply chain and customer homes by 24% by 2030.

#### Key metric

- Greenhouse gas emissions per 100sqm completed homes (scope 1, 2 and 3) Tonnes CO<sub>2</sub>e/100m<sup>2</sup>.

### Nature

Improve access to and enable enjoyment of nature for customers and communities by regenerating the natural environment on our developments.

#### Key target

Increase natural habitats by 10% on new sites from 2023 and include our priority wildlife enhancements from 2021.

#### Key metrics

- Percentage increase in natural habitats on new sites.
- Percentage of new sites with our priority wildlife enhancements and number of enhancements implemented.

### Resources and waste

Protect the environment and improve efficiency for our business and our customers by using fewer and more sustainable resources.

#### Key target

Cut our waste intensity by 15% by 2025 and use more recycled materials. By 2022, publish a towards zero waste strategy for our sites.

#### Key metric

- Tonnes of construction waste per 100m<sup>2</sup> build.

# Climate change

## Our approach

We have been working to reduce our greenhouse gas emissions for many years and, since 2013, we have achieved a 30% cut in emissions intensity from our operations. However, with the world needing to reach net zero emissions by 2050, we now need to go further. We will make significant cuts in our operational emissions by 2025 and increase our focus on reducing emissions associated with our supply chain and our customer homes in use.

We will also help our customers to reduce their own carbon footprint by the changes we make in our homes and by enabling more sustainable transport options.

## Our climate impact

Our total carbon footprint, including from the homes we build and the goods and services we buy, was 2 million tonnes of CO<sub>2</sub> in 2020



**1%**  
**Our operations**

Emissions from construction sites, offices, transport (scope 1 and 2 emissions)



**40%**  
**Customer homes**

Future emissions from customers living in our homes and developments (scope 3)



**59%**  
**Supply chain**

Emissions from raw materials, extraction, processing, manufacturing, transport (scope 3)

**That's 210  
tonnes per  
home we build**

# Our targets

## Our science-based target

**Achieve our science-based carbon reduction target:**

- **Reduce operational carbon emissions intensity by 36% by 2025.**
- **Reduce carbon emissions intensity from our supply chain and customer homes by 24% by 2030.**

By adopting a science-based carbon reduction target we will reduce our footprint in line with the Paris Climate Agreement. Our targets have been approved by the Science Based Targets initiative which has confirmed that our operational target is consistent with reductions required to keep warming to 1.5°C. Our scope 3 goal meets the SBTi's criteria for ambitious value chain goals, in line with current best practice.

We will track our progress using an intensity metric, enabling us to reduce emissions as our business grows and we deliver homes to more customers.

## Reducing energy use and switching to renewable sources

**Reduce operational energy intensity by 32% for UK building sites by 2025.**

**Purchase 100% REGO backed green electricity for all new sites.**

We will reduce some emissions at source by improving our energy efficiency as well as switching to renewable electricity.

## Reducing emissions from our supply chain and customer homes

**Reduce embodied carbon per home by 21% by 2030.**

**Reduce emissions from customer homes in use by 75% by 2030.**

Our increased focus on scope three emissions will see us cut greenhouse gas emissions associated with materials and the products we buy (embodied carbon) and make our homes more energy efficient for customers.

## Tackling emissions from transport

**Reduce car and grey fleet emissions by 50% by 2025.**

**Make it easier for 40,000 customers to work from home and enable more sustainable transport choices through 36,000 EV charging points and 3,000 additional bike stands by the mid 2020s.**

We'll tackle our own emissions from transport and also help customers to reduce their impact.

## Adapt our business to a changing climate

**Update our policies and processes to reflect the risks and opportunities from a changing climate by 2022.**

We'll make sure our business is prepared for the impacts of climate change and do what we can to mitigate the impact on our customers.

## Progress so far

- 30% reduction in carbon emissions intensity since 2013.
- 39% reduction in absolute carbon emissions since 2013.
- 58% green electricity purchased.
- 'B' rating in CDP Climate Change.



# Nature

## Our approach

**We already integrate wildlife enhancements and habitat improvements on many of our sites. However, biodiversity loss in the UK is so acute that we need to do more and to use our sites to protect, enhance and increase biodiversity. We will integrate habitat improvements and wildlife enhancements across all our sites, meeting the new biodiversity net gain regulatory requirements and going further.**

We will create opportunities for customers to engage with nature on our sites and through partnerships with nature organisations. Our goal is for our efforts to both benefit biodiversity and support residents' wellbeing and customer satisfaction.

## Creating a positive impact

With the launch of our strategy we will:



Allocate space for nature



Partner with conservation organisations to develop our approach



Integrate wildlife friendly features, like ponds



Landscape our sites with wildlife friendly plants



Include enhancements such as hedgehog highways



Engage customers on nature



# Our targets

## Habitat and species improvements

**Increase natural habitats by 10% on new sites from 2023 and include our priority wildlife enhancements from 2021.**

We will increase natural habitat areas on our sites, compared with before development begins. Our approach will encompass all our regional business including those in Wales and Scotland not covered by net gain regulation.

## Wildlife enhancements

**Include our wildlife enhancements on all suitable new sites:**

- Hedgehog highways from 2021.
- Bug hotels (at least 20% of homes) from 2021.
- Bat boxes (at least 5% of homes) from 2022.
- Bird boxes (at least 80% of homes) from 2023.
- Wildlife ponds from 2024.
- Reptile and amphibian hibernation sites from 2025.

**All new sites have planting that provides food for local species throughout the seasons.**

New sites will have a wildlife enhancement plan to encourage wildlife to make a home on our developments. Enhancements will be included on all sites that are suitable for the target species and where technically feasible. We will track our progress and assess the impact of our interventions on biodiversity.

## Encouraging engagement with nature

**Help customers engage with nature and create 20,000 more nature friendly gardens by 2025.  
200 beehives on our sites by 2025.**

We will create opportunities for customers to learn about and experience nature through our partnerships, and by helping them to implement nature friendly gardening techniques.

## Progress so far

- Around 2,000 biodiversity enhancements on our sites every year.
- Ecological impact assessment carried out for all sites.
- Our Home for Nature Toolkit helps our teams implement wildlife enhancements.



# Resources and waste

## Our approach

Housebuilding is a resource intensive industry, using significant volumes of water, energy and materials and producing a lot of waste. We want to reduce this impact, selecting more recycled and sustainable materials, improving resource efficiency at every stage and designing out waste. Over time, we aim to adopt more 'circular' approaches to resource use and move towards net zero waste from the construction of our homes.

We can't yet quantify the environmental impacts of all the materials and resources we use. We will be working with suppliers to gather more data in this area as a key step towards improving our performance.

Air quality on our sites and in customer homes is an increasingly important issue and we will be conducting research to better understand our impact. We need to make sure that customers have the information they need to maintain air quality in their new build home.

## Our impact



Use of materials such as timber, bricks and plasterboard



73,300 tonnes of construction waste



7.9 tonnes of construction waste per 100m<sup>2</sup> built



454 million litres of water used



97% of construction waste is recycled



Packaging a key source of construction waste



# Our targets

## Designing out waste

**Cut our waste intensity by 15% by 2025 and use more recycled materials. By 2022, publish a towards zero waste strategy for our sites.**

**Engage with suppliers to meaningfully reduce plastic packaging on our sites by 2025.**

**Help 20,000 customers to increase recycling at home by 2025.**

Our initial focus is on reducing construction waste, prioritising materials such as single-use plastic and making changes in our customer offer to encourage household recycling. We will also publish a towards net zero waste approach to help us further reduce our impact.

We will monitor progress using a waste intensity metric, so we can compare performance year on year, even as our business grows.

## Conserving water

**Reduce operational mains water intensity by 10% on a 2019 baseline by 2025.**

**Make it easier for 20,000 customer households in water stressed regions to install a water butt by 2025.**

We already integrate water efficient taps and appliances in homes and will now enable customers in key regions to reduce water use in their gardens too.

## More sustainable materials

**Measure the environmental footprint of the key materials in our homes and set a reduction target.**

Working with suppliers we will identify the key environmental impacts from our materials use and work together to reduce these.

## Indoor and outdoor air quality

**Measure air quality in our homes and on our sites in 2021.**

**Give customers the information they need to maintain good air quality in their homes by the end of 2021.**

We will develop our approach in this area, improving our understanding of air quality on our sites and in our homes and supporting customers to maintain good internal air quality.

## Progress so far

We are already working with our suppliers and site teams in our efforts to reduce waste. Key actions include:

- Our Waste Dos and Don'ts guide and induction process for site teams.
- A waste league table for our regional businesses.
- 15% of the potential bonus for Site Managers linked to performance on waste reduction.
- Partnering with suppliers to reduce off-cuts by specifying pre-cut materials.
- Over 19,400 paint pots reused or recycled from our sites last year.



# How we will implement our strategy

**Our environment strategy has been approved by our Group Management Team, our most senior executive committee, and our Board of Directors.**

Responsibility for implementing our targets lies with our heads of disciplines and leaders in our regional businesses, and progress will be reported quarterly to our Group Management Team. Our Legacy, Engagement and Action for the Future (LEAF) committee, chaired by one of our executive team members, will monitor our progress.

Our network of Sustainability Champions, one in each regional business, will help us to implement our strategy on the ground and gather data on our performance.

We will be rolling out training to help equip colleagues and suppliers with the knowledge, skills and confidence they need to implement our approach and achieve our targets.

We will report our progress each year through our [Annual Report and Accounts](#) and our [Sustainability Report](#).

## Get in touch

We welcome your feedback on our approach to sustainability. You can contact us at: [sustainability@taylorwimpey.com](mailto:sustainability@taylorwimpey.com)

More information is available on our website [www.taylorwimpey.com/corporate/sustainability](http://www.taylorwimpey.com/corporate/sustainability)





## **APPENDIX 2**

### **Landscape Representations**



# Landscape and Visual Overview of draft Site Allocations on the periphery of Andover and Ludgershall

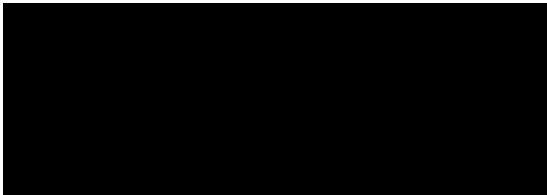
## ANDOVER NORTH EAST - LAND AT FINKLEY DOWN FARM

March 2024

Draft Test Valley Borough Local Plan 2040  
regulation 18 Stage 2 Consultation

Prepared by CSA Environmental  
On behalf of Taylor Wimpey UK Limited  
Report No CSA/1845/010

Prepared by:



On behalf of:

Taylor Wimpey UK Limited



|       | Date:    | Prepared by: | Authorised by: | File reference: |
|-------|----------|--------------|----------------|-----------------|
| Draft | 25/03/24 | JP/CC        | CA             | 1845/010        |
| A     | 27/03/24 | CC           | CA             | 1845/010        |
|       |          |              |                |                 |
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Appendix A: Methodology



# 1: INTRODUCTION

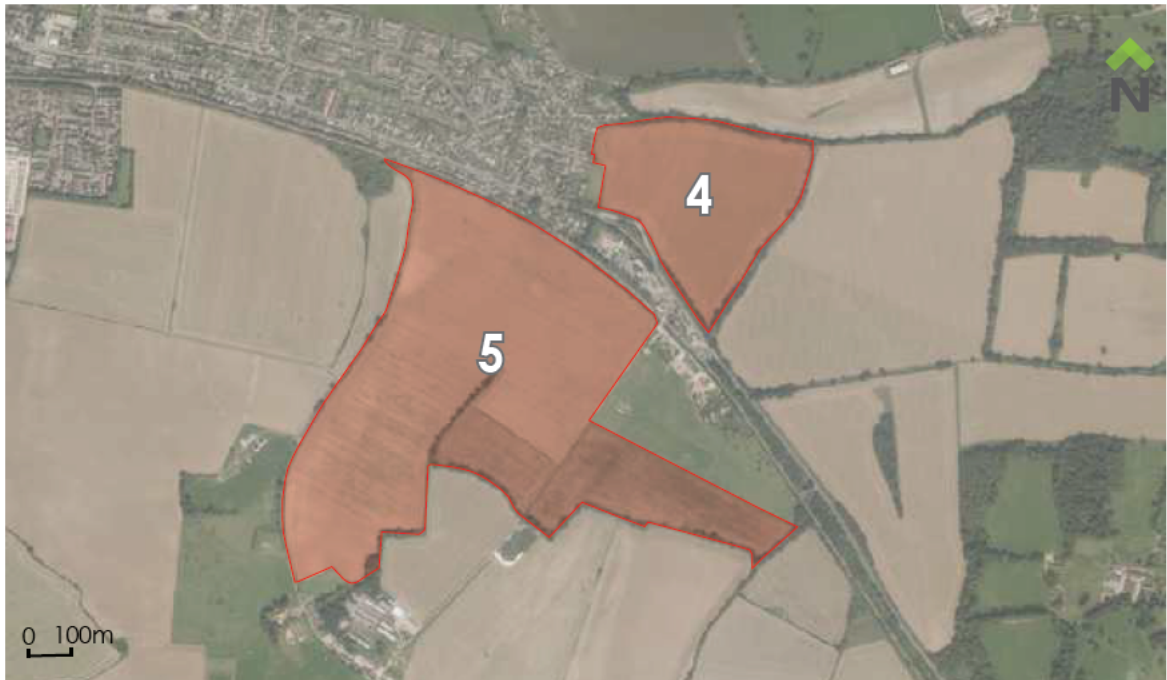
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- 1.1 CSA Environmental has been appointed by Taylor Wimpey UK Limited to undertake a landscape and visual overview of a number of sites on the periphery of Andover and Ludgershall. Taylor Wimpey are promoting land at Finkley Down Farm (Andover North East) through the emerging Test Valley Local Plan, as a suitable location for a residential led development. The council have published the draft Local Plan 2040 Regulation 18 Stage 2, with public consultation taking place between 6th February and 2nd April, 2024. The draft Local Plan does not identify the land at Finkley Down Farm (Andover North East) as a potential housing allocation.
- 1.2 This assessment looks at 4 potential housing allocations identified in the draft Local Plan on the periphery of Andover and Ludgershall and considers their ability to accommodate residential development, in landscape/townscape and visual terms. It also considers the land at Finkley Down Farm, Andover North East. Section 2 of this report considers the Council's landscape evidence base; Section 3 contains our own assessment of the Areas; and Section 4 sets out a comparative analysis of the 5 areas.
- 1.3 This overview is based on site visits undertaken by suitably qualified and experienced Landscape Architects in March 2024. Weather conditions on the day of the landscape appraisals was mostly dry and visibility was good.
- 1.4 The Landscape and Visual Methodology is set out in Appendix A.

## Study Areas

1.5 The sites assessed around Andover and Ludgershall are indicated on the plans at Figure 2.1, and are:

- **Area 1** - Land at Finkley Down Farm (North East Andover)
- **Area 2** - Land at Bere Hill (South East Andover)
- **Area 3** - Land at Manor Farm (North Andover)
- **Area 4** - Land south of Biddesden Lane (East of Ludgershall)
- **Area 5** - Land east of Shoddesdon Lane (South East of Ludgershall)



Study Areas

Figure 2.1: Study Area

## 2: BASELINE INFORMATION

### Planning Policy

#### Test Valley Borough Revised Local Plan DPD - 2011-2029 (2016)

2.1 The Revised Local Plan (DPD) was adopted by the Test Valley Borough Council on 27 January 2016 and forms the main part of the Development Plan for the Borough. The policies which are relevant to this overview are the following:

- **Policy E2 Protect, Conserve and Enhance the Landscape Character of the Borough**
- **Policy E3 Local Gaps**
- **Policy E5 Biodiversity**
- **Policy E6 Green Infrastructure**
- **Policy E9 Heritage**

#### Test Valley Borough Draft Local Plan 2040 Regulation 18, Stage 2

2.2 The Draft Local Plan 2040 has already undergone initial public consultation. Now the Regulation 18 Stage 2 document is undergoing consultation until Tuesday 2nd April 2024. The draft policies which are relevant to the draft allocations considered in this report are:

- **Draft Policy NA5 Land at Manor Farm, North Andover add in relevant requirements for sites**
  - approx. 800 dwellings and 1.5ha of employment land;
  - Provision of significant and high quality green space to the north;
  - Appropriate buffer to the east adjacent to Knights Enham and west adjacent to Charlton Crematorium; and
  - Access via Saxon Way and enhancement of existing public rights of way.
- **Draft Policy NA6 Land at Bere Hill, South Andover**
  - Approx. 1400 dwellings and 2FE primary school;
  - High quality accessible green space to the north and north east and landscape screening along the route of Ladies Walk;
  - Submission of a heritage assessment to ensure development responds sensitively to setting of Ladies Walk, Iron Bridge and Listed buildings;
  - Access via A3093 roundabout and enhancement of public rights of way; and
  - Appropriate buffer to southern and eastern boundaries for noise mitigation to the A303 and A3093.
- **Draft Policy NA7 Land to East of Ludgershall**
  - Approx. 350 dwellings;
  - Appropriate layout to reflect North Wessex Downs National Landscape;
  - Mitigation for Salisbury Plain Special Protection Area ('SPA'); and
  - Access via A342.

- **Draft Policy NA8 Land to the South East of Ludgershall**
  - Approx. 1150 dwellings and 1.5FE primary school;
  - buffer to Willis Wood Ancient Woodland
  - Mitigation for Salisbury Plain SPA;
  - Access via bridge over railway line to the A342; and
  - enhancement to existing public rights of way.

2.3 Other draft policies of relevance to this report include:

- **Draft Policy SS1 Settlement Hierarchy**
- **Draft Policy SS2 Development in the Countryside**
- **Draft Policy SS6 Meeting the Housing Requirement**
- **Draft Policy ENV2 Development Affecting Heritage Assets**
- **Draft Policy ENV3 Landscape Character**
- **Draft Policy ENV4 Local Gaps**
- **Draft Policy BIO3 Biodiversity Net Gain**
- **Draft Policy BIO4 Green Infrastructure**
- **Draft Policy BIO5 Trees and Hedgerows**
- **Draft Policy HE3 Access to the Countryside**

### **Sustainability Appraisal (Interim SA Report (Regulation 18 Stage 2): Appendix IV Housing Site Appraisals**

2.4 Appendix IV of the Interim SA Report contains the housing site appraisals for growth options in the borough. The conclusions from the relevant appraisals are set out below. In some instances the areas considered differ from those put forward as draft site allocations.

#### **Manor Farm (SHELAA 165)**

*'This site is located with good accessibility to essential services and amenities and is well related to the settlement of Andover. Site access can be delivered from Saxon Way. There are landscape sensitivities and Ancient Woodland to the north of the site, the development proposes a woodland and Country park to the north of the site as a landscape buffer to the AONB and the Ancient Woodland beyond. There is potential to locate development adjacent to the Andover settlement boundary of an appropriate scale to avoid adverse impacts on settlement distinction and maintain the local gap and also provide an appropriate buffer to listed buildings at Knights Enham.'*

#### **Bere Hill (SHELAA 167 and 247)**

*'This site is sustainably located with good accessibility to essential services and amenities and is well related to the settlement of Andover. Site access proposed from the A3093 roundabout. Development of the site would involve the loss of agricultural land grade 3a, otherwise the site is relatively unconstrained in ecology and floodrisk terms. There are heritage asset considerations including impact on Ladies Walk and listed buildings to consider. The site is also located adjacent to the A3093 with a small amount of noise buffer adjacent to the A3093.*

*There are overhead pylons running across the site which the site promoter proposes to retain.'*

### **Land East of Ludgershall (SHELLA 61)**

*'Site located adjacent to Ludgershall and proposed strategic allocation to the west of the A342. The site is also located in close proximity to strategic housing allocations within Wiltshire. Site access can be achieved from the A342. There is landscape sensitivity to the AONB but this can be addressed with landscaping. A co-ordinated approach to the improvement of local service provision will be required working closely with Wiltshire Council.'*

### **Land South East Of Ludgershall (SHELLA 324)**

*'Site located adjacent to Ludgershall and proposed strategic allocation to the east of the A342. The site is also located in close proximity to strategic housing allocations within Wiltshire and provides the opportunity to deliver a sustainable new neighbourhood. Site access proposed from the A342 involving a new roundabout and bridge over the railway, further work required with Wiltshire Council and Hampshire County Council regarding deliverability. There is landscape sensitivity to the AONB (to the north) but this can be addressed with landscaping. Some areas of Ancient Woodland affect the site and will need to be taken into account in master planning.'*

### **Land at Finkley Down Farm, Andover (SHELLA 165)**

*The site is adjacent to Augusta Park on the eastern edge of Andover in close proximity to essential services and amenities. This location has landscape sensitivity and relationship to the AONB but can be addressed by concentrating development to the west of the site and through landscaping [our underlining]. Transport impacts in this area have potential to cause significant issues on local network and Enham Arch. The southern site boundary abuts the railway line where noise attenuation measures are likely to be required. Site not proposed for allocation as less constrained and more sustainable alternatives in Andover.*

## Landscape Character and Sensitivity

### National Landscape Character

- 2.5 Natural England has produced profiles for England's National Character Areas (NCA), which divides England into 159 distinct natural areas, defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Andover lies within the Hampshire Downs (Character Area 130).
- 2.6 The Hampshire Downs landscape character area is defined by the following key characteristics:
- Chalk arable downland that is rolling and elevated with long-distance views and open skies provided by an exposed, open character.
  - The plateau and upper valley slopes are characterised by low-hedged large fields with shelterbelts and blocks of ancient semi-natural woodland.
  - The Test and its tributaries are distinctive, running in deep valleys which have cut into the chalk.
  - Evidence of prehistoric settlement is widespread on the open downlands, with visually prominent iron-age hill forts and burial mounds. There is evidence of Roman occupation in the valleys and village settlement and field patterns which reflect the medieval period.
  - There is variation between the low-density, nucleated settlement pattern in the upper reaches of the rivers and on the Downs and between the relatively dense strings of villages along the lower river valleys.

### County Landscape Character

- 2.7 Hampshire County has an Integrated Character Assessment. Within this, Andover is categorised within a Townscape Assessment, surrounded by the three Landscape Types of Downland Large Mosaic Scale, Open Downs and River Valley Floor. Andover, Ludgershall and their immediate surrounds fall within three Landscape Character Areas (LCAs):
- 3b: Test Valley;
  - 7a: North West Hampshire Downs;
  - 8d: Andover Open Downs.
- 2.8 The Test Valley LCA is to the south and east of Andover and is characterised by:
- The north has a predominantly chalk geology which, towards the south, changes to Plateau Gravels and Tertiary Clays;
  - To the north there are steep, abrupt valley sides which become gentler to the south. Tributaries are long and extend deep into the chalk hinterland;
  - A rich biodiversity is supported by chalk alkaline, nutrient rich spring water. Riverine, grassland, wetland and woodland habitats are nationally designated;
  - The river course is generally meandering and braided. Luxuriant riverine vegetation, former water meadows, marshes and reedbeds border its route;

- The valley sides are used for arable and pasture, the valley terraces for arable production and the floodplain meadows as unimproved grazed land;
- There are wide-ranging scales and enclosure patterns along the valley side with boundaries defined by hedgerows and hedgerow trees;
- Close to major towns and roads there are urban influences and noise intrusion, however the LCA is generally unspoiled, tranquil and remote;
- Roads and lanes are generally winding and follow the valley floor edge;
- The historic village morphology is intact with little 20th century alteration. The use of cob for building is significant.
- The urban settings of Totton and Southampton to the south contrast with the smaller settlements and lightly populated areas in the main villages and tributaries; and
- The open parts of the valley sides provide good views along and across the valley. Views are limited along the valley floor.

2.9 The North West Hampshire Downs lie on areas of higher ground to the north of the River Test and are characterised by:

- Varied landform comprising high rolling hills cut by steep sided, long, sinuous dry valleys, scarps and dramatic combs.
- Biodiversity value from remnant areas of chalk grassland and ancient woodlands.
- Repeating pattern of woodland with long sinuous hangers on steep dry valley sides and extensive woodland blocks on clay capped summits.
- Strong hedgerow structure defining arable fields, sometimes with hedgerow trees.
- Mosaic of arable farmland between woodland with some pasture on steep slopes, former downland and valley bottoms.
- A concentration of celtic origin field systems in the northwest of the character area still traceable in today's landscape.
- Varied field pattern including assart enclosures with wavy field boundaries and some areas of more large scale parliamentary enclosure.
- Low density, dispersed pattern of nucleated ridge top and valley villages/hamlets and isolated farmsteads.
- Generally inward looking and contained landscape as a result of topography and vegetation.
- Unspoilt character, tranquil, rural and of high scenic quality (designated AONB [National Landscape]).

2.10 The Andover Open Downs wraps around Andover to the north, west and south and is characterised by:

- Plateau downland with dry chalk valleys and gently undulating ridges;
- Occasional prominent hills create visual features within the downland;
- A landscape which is open and expansive with river valleys which dissect the plateau and long-distant views across the downland;
- Harewood forest provides biodiversity value and dispersed areas of chalk grassland, which includes internationally designated sites;
- Land use is predominantly arable with limited pasture to the south;
- Woodland cover restricted to areas where there are notable deposits of clay with flints, resulting in a simple landscape composition;
- An archeologically important landscape with significant time depth, particularly from prehistoric and Roman periods. This is especially associated with high areas and areas of open downland;
- Predominantly 19th century formal enclosure pattern. In places this is defined without boundaries or with a weak hedgerow structure. This tends to overwrite earlier field boundary patterns, particularly in the downland;
- Visual diversity is provided by occasional parkland landscapes;
- Andover's urban edge extends into the LCA;
- Beyond the urban area, the pattern of nucleated villages and farmsteads is dispersed; and
- Away from Andover, particularly where there is little settlement in the south, there is remoteness and tranquillity.

## Test Valley Landscape Sensitivity

- 2.11 The Test Valley Landscape Sensitivity Study 2024 examines candidate sites within the Strategic Housing and Employment Land Availability Assessment (SHELAA). The landscape sensitivity is assessed as the combination of landscape value and landscape susceptibility. Landscape value is assessed in line with the criteria in *Guidelines for Landscape and Visual Impact Assessment, 3rd Edition* ('GLVIA 3'). Landscape susceptibility is assessed in relation to large scale residential and mixed use development in line with the criteria of *An approach to Landscape Sensitivity Assessment* (Natural England, 2019) as follows:
- Designated landscape interests;
  - Landscape scale, pattern and texture;
  - Perceptual and experiential characteristics;
  - Settlement characteristics and settlement edge conditions;
  - Topographic features and skylines; and
  - Visual characteristics and intervisibility.
- 2.12 The following sections summarises the findings of the study in respect of the sites considered in this report.

### Andover North East, at Finkley Road / East Anton (Finkley Down Farm)

- 2.13 The study considers an extensive parcel which extends well beyond the land being promoted by Taylor Wimpey. It extends east of the residential area at Augusta Park to the scheduled monument at Devil's Ditch and the boundary of the North Wessex Downs AONB, and includes land to the north of Finkley Road.
- 2.14 This parcel was assessed as having on average **Regional** level landscape value. It's northern and eastern boundaries border the North Wessex Downs National Landscape and there are scheduled monuments within the eastern part of the parcel. In contrast the western part is considered to be degraded due to its proximity to the settlement edge. It notes that this area contains fewer positive landscape attributes and is of '...markedly lower landscape value' [our underlining].
- 2.15 The parcel was assessed as having on average **Moderate-High** susceptibility. The northern and eastern parts have considerable openness and the presence of nearby designations. However, the study states that:
- 'The settlement edge influenced landscape in the lower lying land to the west and the more obvious urban edge influences to the south (railway, pylon line, industrial estate) combine to reduce susceptibility here, as the landscape here already has notable sense of intrusion and interruption.'*
- 2.16 In terms of settlement characteristics and settlement edge characteristics it notes that the established woodland belts associated with East Anton MDA (Augusta Park) provide a clearly defined settlement edge. However, it should be noted that these are relatively recent woodland plantings and a similar buffer could be replicated to the east of the land being promoted at Finkley Down Farm as shown on the Illustrative Masterplan which accompanies these representations.

- 2.17 Overall the majority of the parcel was assessed as having **High** landscape sensitivity. However, in respect of the land to the south west and west which is being promoted as a residential site allocation it states the following:

*'The westernmost parts of the parcel, west of the PRoW which intersects Finkley Road and which forms a natural topographic dividing line in the landscape, have a lower (**Moderate** [our emphasis]) overall sensitivity to change arising from the development scenario, as does the land in the south-west, by virtue of lower elevation, relative visual containment, settlement edge influence and the presence of large-scale infrastructure.' [our underlining]*

#### **Andover North - Land at Manor Farm**

- 2.18 The study considers an extensive parcel to the north of Andover which includes land to the east and north of the proposed site allocation. The study describes the parcel as follows:

*'The parcel is extensive in area, is designated as part of a Local Gap and fulfils a valuable physical and perceptual function between Enham Alamein and Andover, even with the localised encroachment of the East Anton MDA on the southern horizon. The parcel is important in creating the rural approach/gateway to Enham Alamein. To the south, the parcel wraps around and is adjacent to the historic hamlet of Knights Enham and forms part of its setting.'*

- 2.19 **Land at Manor Farm** (South of Enham Alamein) was assessed as having **Regional** level landscape value. It is described as an archetypal example of the rolling chalk downland landscapes overlaid by arable farmland which characterise much of the setting of Andover. It has co-axial field boundaries and holloways / green lanes accommodating the PRoW network. These elements it states, *'...combine to create a landscape of some interest and strategic importance' [our underlining]*. The parcel contributes to the Local Gap and the physical and perceived separation between Andover and Enham Alamein.

- 2.20 The parcel was assessed as having **High** susceptibility overall, with susceptibility marginally lower (**Moderate - High**) at the settlement fringe, including the lower lying land around Charlton, although it notes that there are no natural parameters to accommodate development here. The study states:

*'The elevated 'downland' landform cut by the incised chalk dry valley creates a notable sense of separation from the town of Andover, [our underlining] which the parcel overlooks to the south. Views of Andover within its valley are apparent as one moves south, although the northern half of the parcel has a distinctly rural quality. This elevates susceptibility to change arising from the scenario, as does the level of access afforded to the landscape of the parcel for recreational experience through the PROW network.'*

- 2.21 In terms of visual susceptibility the study states that there is extensive intervisibility with the wider landscape due to the elevation, scale and openness of much of the parcel. Overall the sensitivity of the parcel was assessed as **High**. It notes that sensitivity is slightly lower west of Saxon Way, although *'..it maintains a sense of separation from the settlement edge'*.

### Andover South East, Land at Bere Hill

- 2.22 The parcel assessed in the study is broadly consistent with the proposed site allocation at Bere Hill.
- 2.23 The parcel was assessed as having **Neighbourhood** level landscape value as it is a relatively commonplace landscape albeit with local landmarks such as Ladies Bridge and its contribution to the setting of Andover.
- 2.24 The parcel was assessed as having **Moderate-High** susceptibility. the description notes that it is a well-treed settlement edge within remnant co-axial field boundaries and strongly naturalistic topography, which is offset by urbanising influences of the A303 and solar farm to the south. In terms of visual characteristics it states that in some areas there is a strong sense of visual openness, with expansive views to the south east and north in the direction of the North Wessex Downs National Landscape. The parcel was assessed as having **Moderate-High** sensitivity but the portions to the east around Picket Twenty and to the south along the A303 were assessed as having **Moderate** sensitivity.

### Land North of Andover Road (East of Ludgershall) and South of Andover Road (East of Shoddlesdon Lane)

- 2.25 The parcel assessed in the study is broadly consistent with the proposed site allocations at East and South East of Ludgershall.
- 2.26 The parcel was assessed as having **Local** landscape value. Although the northern part has **National** value due to sharing qualities of the National Landscape, this is eroded to the south by the urbanising influence of uses such as Tyre Fitters and Car Breakers.
- 2.27 The parcel was assessed overall as having **Moderate-High** susceptibility. The northern part is relatively visually contained but to the south gentle undulation and relatively sparse vegetation creates high levels of intervisibility. It also notes that the southern area has a strong rural character with little influence from the existing settlement. The sensitivity of the parcel was assessed as **Moderate-High**. This is due to its proximity to the AONB and shared characteristics to the north. In respect of the southern parcel it states:

*'The southern area of the parcel is more open and visually exposed and therefore more constrained in landscape and visual terms to any future potential development.'*

- 2.28 Based on the findings of the Council's landscape sensitivity assessment the land at Manor Farm is assessed as being the most sensitive in landscape and visual terms of the options considered in this report, with a high landscape sensitivity to potential development. The sites at Ludgershall are assessed as being of moderate - high landscape sensitivity. The land at Bere Hill is assessed as moderate - high and moderate landscape sensitivity. The land at Finkley Down Farm is assessed as being of moderate landscape sensitivity due to its low lying position, relative containment and relationship to the nearby settlement edge.

## Statutory Designations and Heritage Assets

2.29 The plans at Figure 3.1 shows the statutory designations and heritage assets which occur around Andover and Ludgershall. Where these have a bearing on the study areas, they will be discussed further in Section 4.

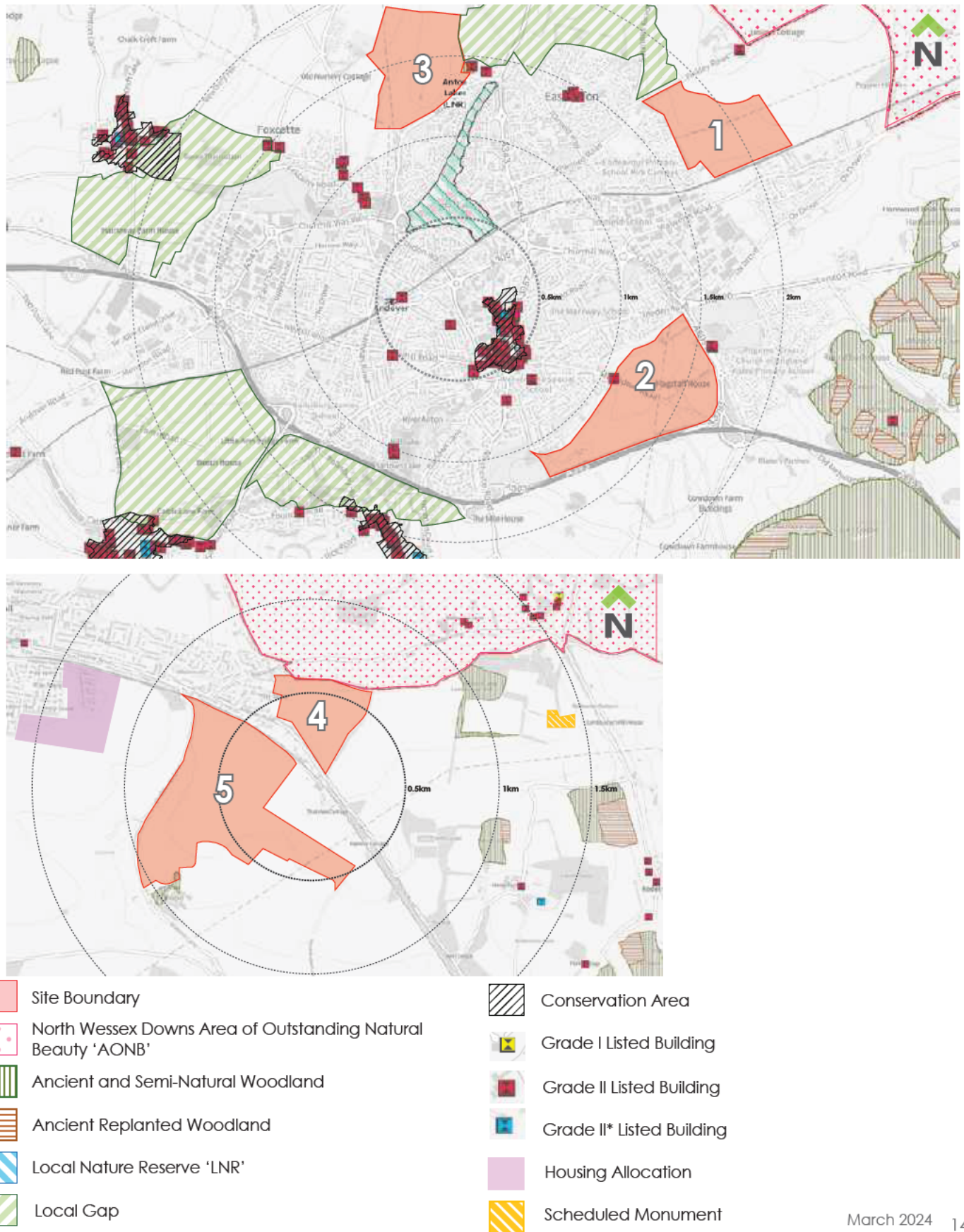


Figure 3.1: Extracts from MAGIC map and Heritage Information

## 3: ASSESSMENT OF DEVELOPMENT POTENTIAL

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- 3.1 The following tables set out our assessment of the landscape and visual characteristics of the draft site allocations and the land at Finkley Down Farm, and their potential to be developed for residential use, and any resultant landscape and visual effects.



## SITE PHOTOS

London-Exeter Railway

Play Area



Photograph 1

View north from Whitethorn Road  
Finkley Manor Farm

Photograph 2

View north east from Restricted Byway 005/7753/1 north of Finkley Down Farm

Finkley Manor Farm

Augusta Park Residential Development



Photograph 3

View south from Footpath 213/713/1  
Walworth Industrial Estate

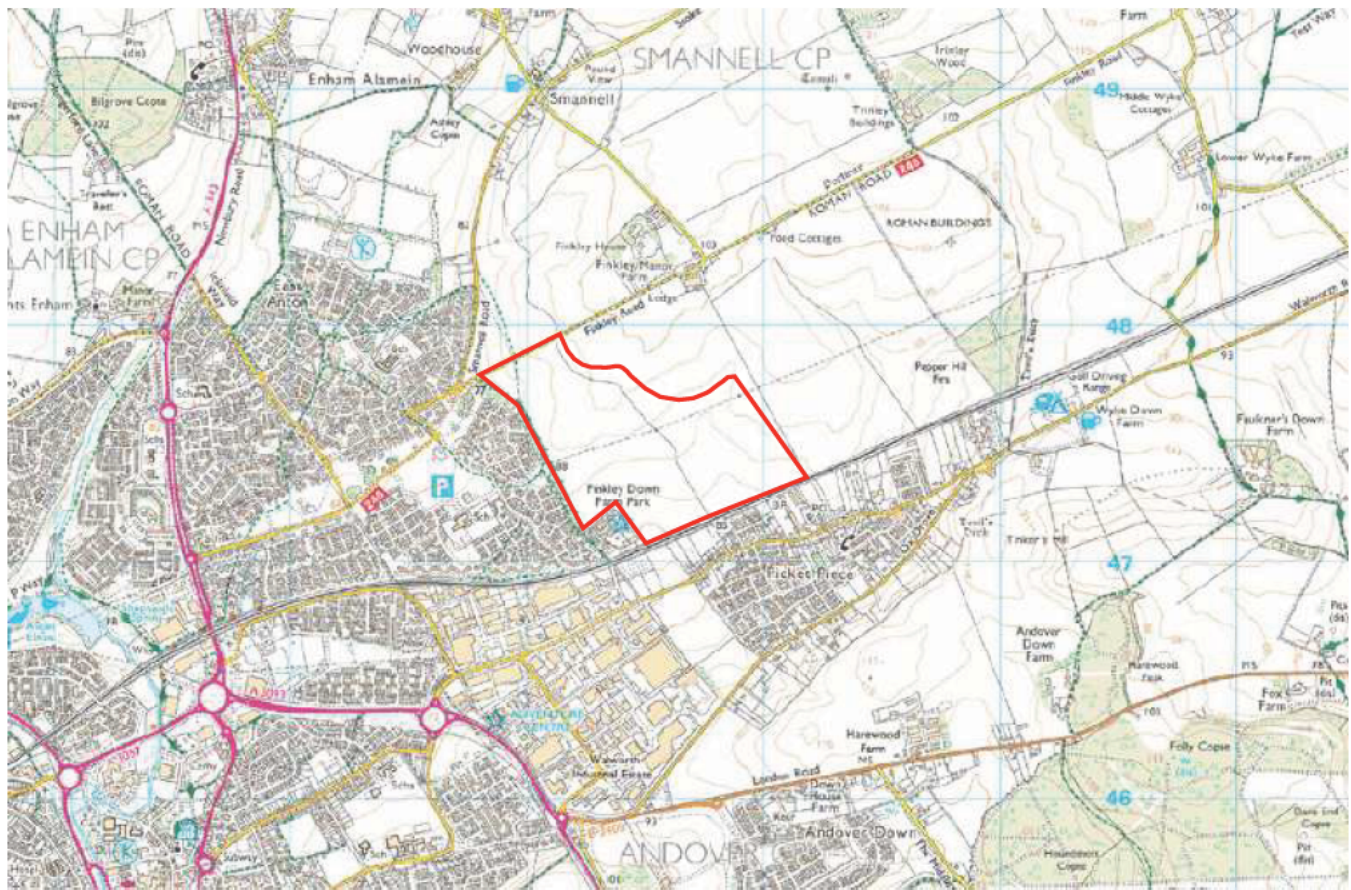
Photograph 4

View south west from Finkley Road at north-east corner of Area A  
Walworth Industrial Estate Augusta Park Residential Development

Photograph 5

View south west from Finkley Road south of Finkley Manor Farm

LOCATION PLAN



AERIAL PHOTOGRAPH



Land at East Anton  
approved Site

| LANDSCAPE AND VISUAL OVERVIEW  |   |
|--|---|
| LANDSCAPE POLICY AND LANDSCAPE CHARACTER   | Falls within the Andover Open Downs LCA   |
| HERITAGE ASSETS  | There are several Grade II Listed buildings within the settlement of Smannell, to the north; to the east, a farmhouse and two Roman features (a Roman villa and Devil's Ditch) designated as Scheduled Monuments. To the west Middle Wyke Farm and Lower Wyke Farm are also Grade II Listed.  |
| PUBLIC RIGHTS OF WAY   | Restricted Byway 005/753/1 runs alongside the western Area boundary. Footpath 005/713/1 runs to the north of the Area beyond Smannell Road and cuts across the north west corner of the Area. There are a number of footpaths which run beyond Smannell Road to the North.  |
| TOPOGRAPHY   | The Area has a distinctly domed landform with a minor ridgeline crossing the site in a south westerly direction leading from Finkley Manor Farm to the north east. The landform falls either side of the ridge, from a highpoint of approximately 95 AOD to 80 AOD and 75 AOD at the north western and south western boundaries respectively. |
| LANDSCAPE QUALITY/SENSITIVITY  | Medium  |
| LANDSCAPE VALUE  | Moderate  |
| VISUAL SENSITIVITY   | Moderate  |
| RELATIONSHIP TO URBAN AREA   | The Area would extend development into open countryside. Development would form an extension to the recently built area at Augusta Park. To the south, the boundary is defined by the London - Exeter railway, with development at Picket Piece extending the existing urban envelope alongside the length of the southern boundary.          |
| <b>AREA DESCRIPTION</b><br><p>The landscape of the Area is relatively undistinguished principally comprising two large arable fields. It has few landscape features and a weak landscape structure although there are a number of significant hedgerows contained at the Area boundaries and at the mid-point of the Area. There are a number of urbanising influences which detract from the overall landscape quality of the Area including over-head powerlines, the London - Exeter railway, the adjoining built up area at Walworth Industrial Estate, Picket Piece and existing and future development at Augusta Park.</p> <p>The undulating topography of the surrounding landscape restricts opportunities for views towards the Area, particularly from the well wooded, agricultural landscape to the north. Views from further east beyond Trinley Wood are typically prevented by the intervening landform and vegetation. There are views towards the Area from the higher ground at Picket Piece on the flank of the Tinker's Hill ridgeline. Similarly, there are views from the public open space at Ladies Walk which forms part of the Bere Hill ridgeline to the south west of the Area, seen in context with surrounding development in Andover. These ridgelines enclose the south eastern edge of Andover restricting opportunities for views towards the Area from further afield.</p> <p>The North Wessex Downs National Landscape lies a short distance to the north east of the Area. The Site is well contained in views from public vantage points in the National Landscape by virtue of the prevailing topography and woodland.</p> |   |
| <b>ABILITY OF THE AREA TO ACCOMMODATE RESIDENTIAL DEVELOPMENT</b><br><p>Development would form an extension to the existing development area at Augusta Park, and would form part of a wider urban expansion on the eastern edge of Andover, which also includes the commercial development at Picket Piece to the south. It is relatively well contained in views from the north and north east and in views from the south west is seen in the context of existing development at Augusta Park. <b>Photographs 3, 4 and 5</b> illustrate the relationship between the Area and the surrounding urban land uses. It is apparent that although development here will extend the eastern edge of Andover into the adjoining countryside it would relate well to existing development in the settlement. Development in this location would also benefit from its close proximity to the community facilities and infrastructure within the adjoining Augusta Park development. The Test Valley Landscape Sensitivity Study notes that this Area, which lies to the west of the National Landscape has a moderate landscape sensitivity to residential development, by virtue of its lower elevation, relative visual containment, settlement edge influence and the presence of large-scale infrastructure. Any development proposals should provide a robust landscape boundary to the eastern edge of the Area with the wider countryside.</p>  |   |
| <b>CONCLUSION</b><br><p>Development would extend the allocated development at Augusta Park eastward into adjoining farmland. Despite the anticipated scale of development, proposals would be relatively well contained in views from the north and east. Despite its location within the countryside, housing would be well related to existing development to the west and south.</p>  |   |



## SITE PHOTOS

Built development in the 'Andover Bowl'



Photograph 1 View north from Footpath 005/3/2 south west of Bere Hill Farm

Solar Farm



Photograph 2 View south east from corner of Footpath 005/3/3

Area 2



Photograph 3 View south east from Ladies Walk south of the Iron Bridge

Trees along Ladies Walk



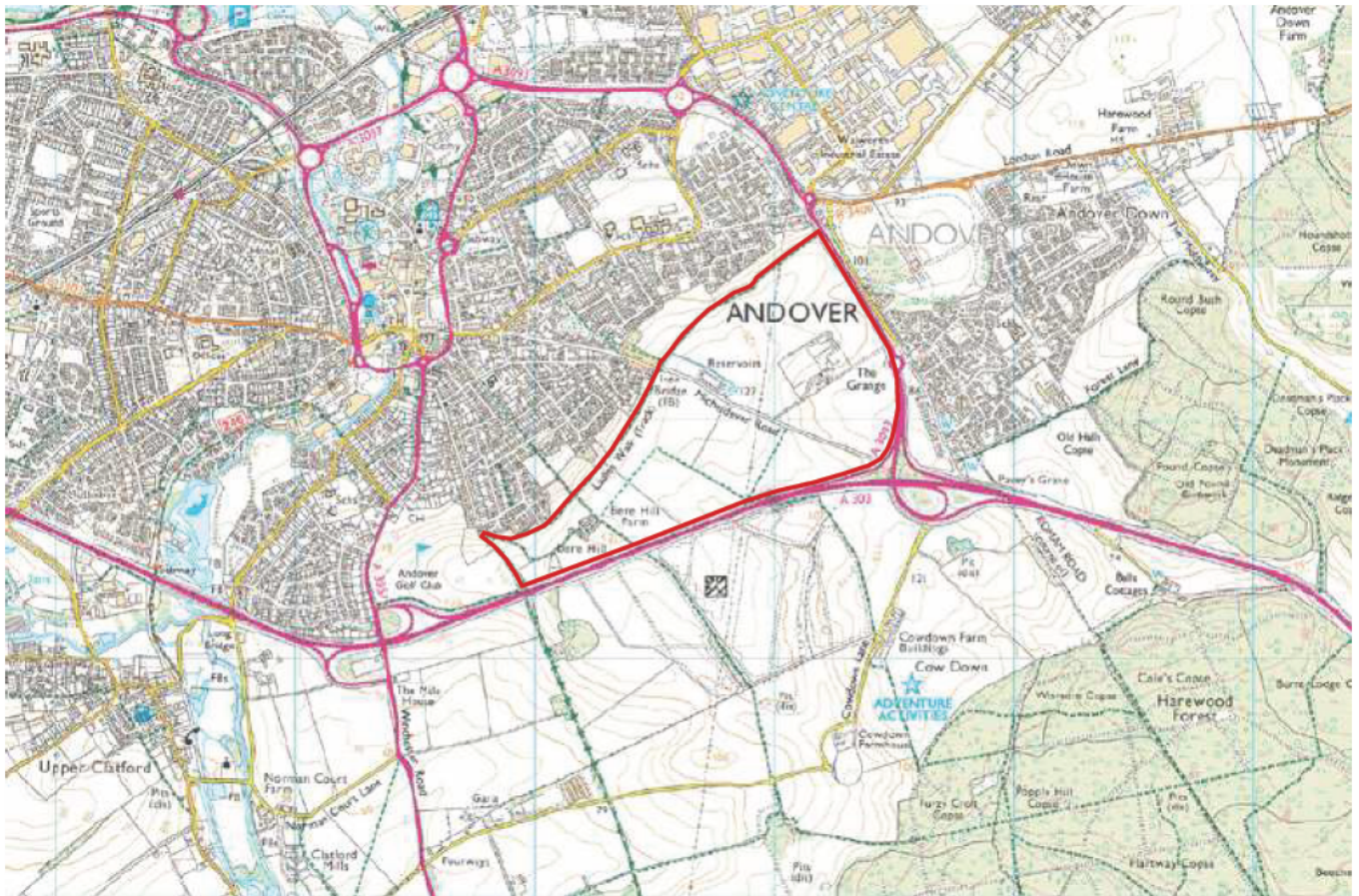
Photograph 4 View south east from Charnwood Close at junction with Hedge End Road

Solar Farm



Photograph 5 View north west from Cowdown Lane south of junction with A3093

## LOCATION PLAN



## AERIAL PHOTOGRAPH



| LANDSCAPE AND VISUAL OVERVIEW   |  |
|---|--|
| LANDSCAPE POLICY AND LANDSCAPE CHARACTER  | Falls within the Andover Open Downs LCA  |
| HERITAGE ASSETS   | Grade II Listed Iron Bridge crosses Micheldever Road at the north western corner of the Area. The Grade II listed barn and granery at Picket Twenty Farm lie to the east of the A3093.   |
| PUBLIC RIGHTS OF WAY  | Public Footpath 005/4/2 (Ladies Walk) runs alongside the northern Area Boundary linking between Old Winton Road and the A3093. Public Footpath 005/5/4 crosses the central part of the Area. Public Footpath 005/3/3 follows the route of Dene Path. Restricted Byway 005/52/2 leads south from Old Winton Road. A cycleway crosses the south eastern part of the Area and a section of the eastern boundary, linking over the A3093 to the new development at Picket Twenty.  |
| TOPOGRAPHY  | The landform is distinctly domed in the north eastern part of the Area rising from approximately 100m Above Ordnance Datum ('AOD') at the north east corner to 120m AOD adjacent to Micheldever Road and again at Bere Hill further south. The majority of the Area sits on a plateau above the distinctive 'Andover Bowl' which accommodates the built up area of the town. Beyond Ladies Walk the landform falls sharply to the existing settlement edge which lies some 15m below. There is also a sharp change in level to the north east adjacent to the A3093 which is contained in a cutting for much of its length.. |
| LANDSCAPE QUALITY/SENSITIVITY   | Medium   |
| LANDSCAPE VALUE   | Moderate   |
| VISUAL SENSITIVITY  | Moderate-high  |
| RELATIONSHIP TO URBAN AREA  | The Area is poorly related to the existing housing to the north owing to the distinct change in level alongside Ladies Walk. Vehicular access to the Area will be from the A3093 which lies outside the existing built up area. Housing at Picket Twenty lies to the east, however is separated by the route of the busy A3093.  |
| <b>AREA DESCRIPTION</b><br><p>The Area comprises a swathe of farmland which extends along the southern edge of Andover as far as the A303. It contains the paddocks and buildings associated with The Grange Farm and the farmstead at Bere Hill Farm. In landscape terms it is relatively pleasant and its elevated landform affords long distance views to the countryside to the east and south.</p> <p>The higher ground within the Area is contained by treed hedge lines alongside Ladies Walk to the north and west respectively. To the east is the vegetation alongside the A3093; to the south is vegetation along the route of the A303; whilst to the west are mature field hedgerows alongside the boundary with the A3057.</p> <p>Overhead pylons cross the eastern part of the Area in a north east - south west direction.</p>  |  |
| <b>ABILITY OF THE AREA TO ACCOMMODATE RESIDENTIAL DEVELOPMENT</b><br><p>This Area is poorly related to the existing settlement edge to the north with the rising land at Ladies Walk providing a distinct sense of separation. Access from the existing residential area north of the Area would be difficult to achieve although there may be opportunities to create pedestrian / cycle linkages. Similarly, although recent residential development at Picket Twenty has extended settlement along the northern edge of the A3093, the busy road provides a barrier to integration between this Area and the adjoining housing development, although there is an existing cycle connection over the highway.</p> <p>The landform within the Area rises significantly above the adjoining residential areas to the north and east of the Site. Existing settlement in Andover is generally contained on lower lying land within the 'Andover Bowl' (<b>Photograph 1</b>). Development on the higher parts of the Area would therefore be contrary to the general pattern of development in the settlement. In addition, housing on the higher ground would be visible in middle distance views from the rising ground to the south. In views from the south, development on the higher ground within the Site would be conspicuous along the route of the A303, with existing housing in Andover contained by the higher ground alongside Ladies Walk. There are views towards the woodland alongside Ladies Walk from vantage points within the built up area of Andover (<b>Photograph 4</b>) and filtered views of housing on the higher ground would be apparent, particularly in winter. In these views, housing would be perched above existing development in Andover and would be contrary to the existing settlement pattern in the town. Housing in the eastern part of the Area will also be visible from the approach along the A3093 and development will be visible from the A303 at the southern edge of the Area.</p> |  |

The existing pylons which cross the eastern part of the Area will also pose a constraint to development. Proposals for access off the A3093 will need to consider the change in level at the Area boundary to the north east and the impact on the established woodland. Housing should generally be avoided on the higher ground alongside Ladies Walk as this would be visible in views from the surrounding area and would be contrary to the existing settlement pattern. There is some scope for development on the lower lying ground east of Micheldever Road and the overhead pylons, subject to providing appropriate landscape buffers alongside the route of the A3093. Development in this location, however, would be some distance from existing facilities within the town.

Although, the Test Valley Landscape Sensitivity Study notes the Area as being subject to urbanising influence from the solar farm to the south of the A303, during the site visit the perceptual experience was very much rural (**Photograph 5**).

## CONCLUSION

The Area has a moderate-high visual sensitivity. The elevated location of the Area and the separation afforded by the topography to the north and the A3093 to the east make effective integration with the existing settlement problematic. The route of the A303 provides a degree of containment to the southern edge, however due to the change in level along Ladies Walk existing housing in Andover is well contained in views from the bypass and from the land to the south.

## SITE PHOTOS



Photograph 1 View north from Saxon Way north of Old English Drive



Photograph 2 View south west from Restricted Byway 270/757/2 (Roman Road)



Photograph 3 View south east from Restricted Byway 270/757/1 west of Little Bilgrove Copse

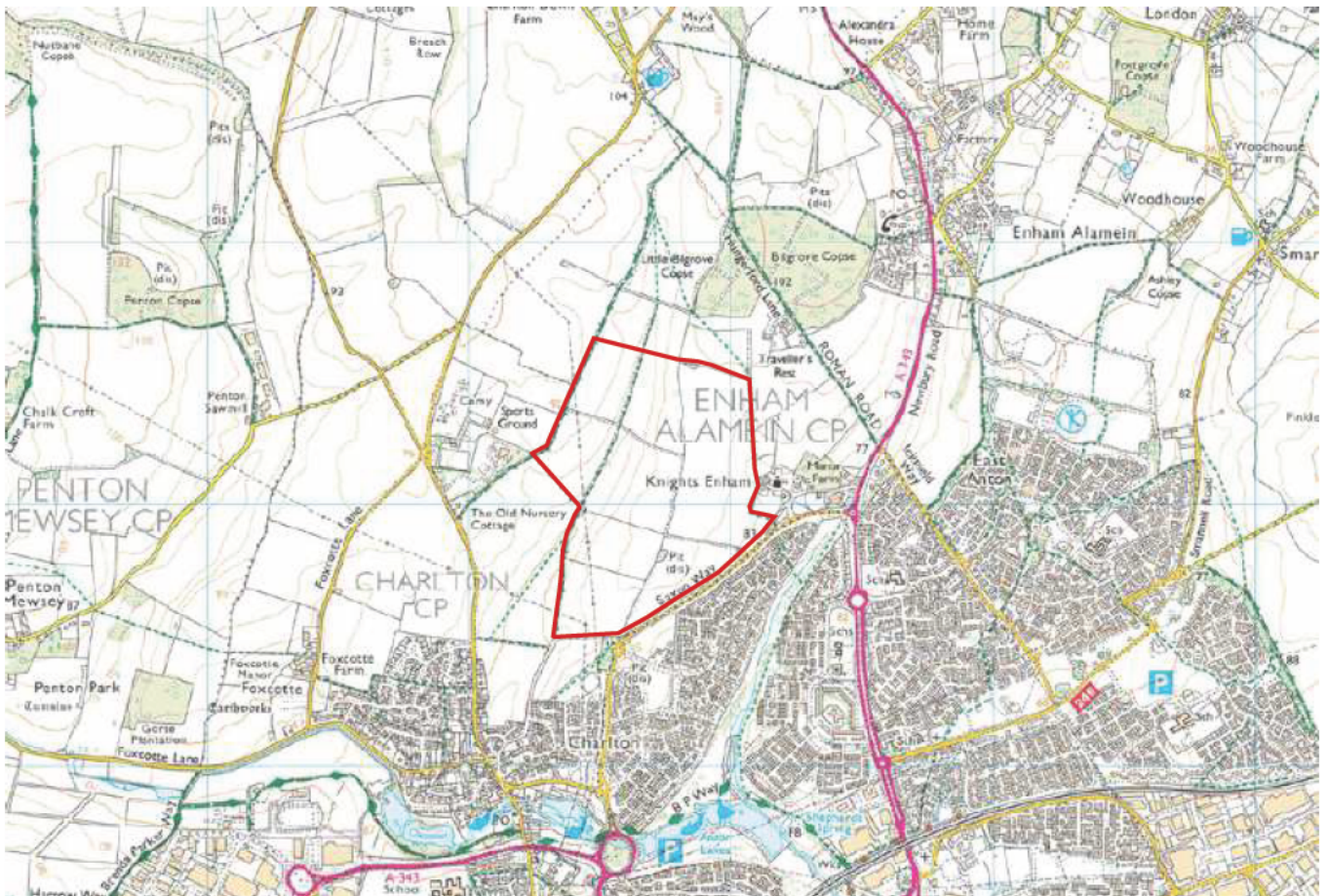


Photograph 4 View east from Restricted Byway 045/758/1 east of Charlton Park Cemetery



Photograph 5 View east from Hatherden Road north of Mercia Avenue

## LOCATION PLAN



## AERIAL PHOTOGRAPH



## LANDSCAPE AND VISUAL OVERVIEW

|  |   |
|--|---|
| LANDSCAPE POLICY AND LANDSCAPE CHARACTER | Falls within the Andover Open Downs LCA.  |
| HERITAGE ASSETS                          | The Grade I Listed Church of St. Michael and All Angels and the Grade II Listed Old Rectory and Manor Farmhouse are located in Knights Enham to the north east.   |
| PUBLIC RIGHTS OF WAY                     | Footpaths 270/726/1, 270/723/1 cross the land to the north east and restricted by-way 270/758/1 runs along the north-western boundary.  |
| TOPOGRAPHY                               | The landform is distinctly domed within the southern part of the Area, rising several metres from Saxon Way to a highpoint of approximately 90m Above Ordnance Datum ('AOD') broadly in the centre of this part of the Area. Elsewhere the Area has a gentle undulation to its landform, falling away to the north west.  |
| LANDSCAPE QUALITY/SENSITIVITY            | Medium - High   |
| LANDSCAPE VALUE                          | Moderate  |
| VISUAL SENSITIVITY                       | Moderate  |
| RELATIONSHIP TO URBAN AREA               | Development of this Area would result in a significant expansion of the settlement north of the existing limits into rural countryside. There are pockets of land alongside Charlton which are better related to the adjoining built up area, as noted in the Test Valley Landscape Sensitivity Study. However these lie outside the area identified as a potential site allocation. The highway and associated vegetation at Saxon Way form a robust boundary to development at the edge of Andover. |

### AREA DESCRIPTION

The Area occupies a broad swathe of predominately pleasant, arable farmland at the edge of the settlement. To the south it is bordered by Saxon Way, beyond which is residential development on the falling ground above Anton Lakes. To the west, the Area boundary follows existing field boundaries, whilst to the north it is marked by a section of Restricted Byway 270/758/1 and the hedgerows that run along both sides of it. The Area is crossed by the route of Footpath 270/726/1. The undulating wooded landscape of the North Wessex Downs National Landscape lies to the north of the Area. The settlement at Enham Alamein lies approximately 560m to the north east whilst the settlement at Penton Mewsey lies to the west. The hamlet at Knights Enham and the Grade I listed Church of St. Michael and All Angels adjoin the south east corner of the Area.

There are views of the Area from the adjoining roads / lanes and from the landscape to the east and west. There open views across the Area from the public rights of way which cross or border the parcel. There are also some middle distance views from footpaths which cross the countryside to the north, although further afield these are contained by mature woodland blocks. There is intervisibility with the heritage assets at Knights Enham and some intervisibility from locations on Hungerford Lane to the east.

The Area is crossed by an overhead powerline which would pose a constraint to development.

### ABILITY OF THE AREA TO ACCOMMODATE RESIDENTIAL DEVELOPMENT

Development within Area 3 would result in a significant expansion to the north of the existing settlement. The landscape is relatively open and forms a buffer to the northern expansion of the town and separation between the edge of Andover and a number of outlying settlements. The landscape has a distinctly rural character with few detractors and would be sensitive to further growth on the northern edge of Andover. Large scale development would impact on the character of the landscape at the edge of the town and on local views from the predominately rural road and rights of way network (**Photographs 3, 4 and 5**).

There is some scope for pockets of development alongside the northern edge of Charlton, as noted in the Test Valley Landscape Sensitivity Assessment. However, this lies to the west of the proposed site allocation.

To the south of the area, the existing edge of Andover is well contained by the vegetated route of Saxon Way (**Photograph 1**), with housing to the south located on the falling ground above Anton Lakes. Expansion to the north of Saxon Way would breach this boundary and extend into open countryside. Any development in this location would impact on the setting of the small settlement of Knights Enham and would be constrained by the domed landform and by the presence of overhead powerlines.

Development would encroach on the settlement at Knights Enham and on the gap between the edge of Andover and Enham Alamein.

The above findings are consistent with the Council's Landscape Sensitivity Study which concluded that this Area has a high Landscape Sensitivity.

## CONCLUSION

Development at the Site would impact on a number of local views from the surrounding predominately rural network of lanes and public footpaths. It would result in a significant expansion to the north of the settlement into open countryside with few visual detractors and would be poorly associated with the existing settlement edge. It would erode the separation between Andover and a number of outlying settlements and would impact on the setting of heritage assets at Knights Enham.

## SITE PHOTOS



Photograph 1 View north west from Bridleway 130/12/1 north of Freeth Copse



Photograph 2 View north east from layby of Andover Road A342 south of Pretoria Road

Dwellings off Biddesden Lane



Photograph 3 View north east from Pretoria Road playground



Photograph 4 View south east from easternmost dwellings on Biddesden Lane



Photograph 5 View south from junction of Biddesden Lane and Bulls Drove

## LOCATION PLAN



## AERIAL PHOTOGRAPH



## LANDSCAPE AND VISUAL OVERVIEW

|  |   |
|--|---|
| LANDSCAPE POLICY AND LANDSCAPE CHARACTER | Falls within the North West Hampshire Downs LCA.  |
| HERITAGE ASSETS                          | The Grade I Listed Biddesden House and a number of Grade II Listed to the north east around Biddesden Farm and Biddesden Bottom. The remains of a Roman villa at Lambourne's Hill to the east is a Scheduled Monument.  |
| PUBLIC RIGHTS OF WAY                     | There are no public footpaths which cross the Area. Bridleway 130/12/1 crosses the farmland a short distance to the south.  |
| TOPOGRAPHY                               | The Area is part of a relatively flat piece of land at around 125m Above Ordnance Datum ('AOD') on the eastern edge of Ludgershall. The land falls sharply to the north to Biddesden Lane, before rising beyond within the National Landscape to 184m AOD at Wick Down.   |
| LANDSCAPE QUALITY/SENSITIVITY            | Medium  |
| LANDSCAPE VALUE                          | Moderate-High   |
| VISUAL SENSITIVITY                       | Moderate  |
| RELATIONSHIP TO URBAN AREA               | The Area borders housing in Ludgershall to the west and there is some limited linear development alongside Andover Road to the south, although it is largely screened by boundary vegetation. There is intervisibility between the Area and the rising ground in the North Wessex Downs National Landscape to the north and the Area forms part of the immediate setting of the National Landscape and the last remaining field between Ludgershall and the designated landscape. |

### AREA DESCRIPTION

The Area occupies a large arable field at the edge of the settlement. It is bordered around almost all of its perimeter by a patchy native hedgerow mostly overgrown to trees. The southern part of the western boundary is a tall formal garden hedge. It directly adjoins Andover Road A342 to the south and to the north is a narrow field and then Biddesden Lane. To the west is residential development between Andover Road and Biddesden Lane. Further north and east are thicker tree belts and larger blocks of woodland within the North Wessex Downs National Landscape, with the rising land within the National Landscape forming the backdrop in views out of the Site. To the south west are larger more open fields.

No public right of way cross the Area. Bridleway 130/12/1 passes east-west to the south and has some visibility of the Area filtered through the patchy hedgerow. There are views from the built up area to the west, with open views from Pretoria Road play area. There are filtered, mainly winter views from Andover Road on the approach to Ludgershall through the existing boundary trees. There is also some intervisibility from Biddesden Lane within the National Landscape, although public views are limited by the lack of public rights of way on the rising ground at the edge of the designated landscape.

### ABILITY OF THE AREA TO ACCOMMODATE RESIDENTIAL DEVELOPMENT

Development within Area 4 would result in an expansion to the east of the existing settlement which would extend built development to the boundary with the National Landscape. It would also extend eastward reducing the separation between the settlement and the scheduled monument at Lambourne's Hill. There is some intervisibility between the area and the National Landscape and it lies within its immediate setting.

### CONCLUSION

Development would remove the remaining rural buffer between the settlement and the National Landscape and would extend built development to the boundary with the nationally designated landscape.



## SITE PHOTOS



Photograph 1 View north west from Shoddeson Lane north of Footpath 130/7/2



Photograph 2 View north from Footpath 130/7/1 east of Willis Wood



Photograph 3 View north east from Footpath 130/7/1 north east of Willis Wood

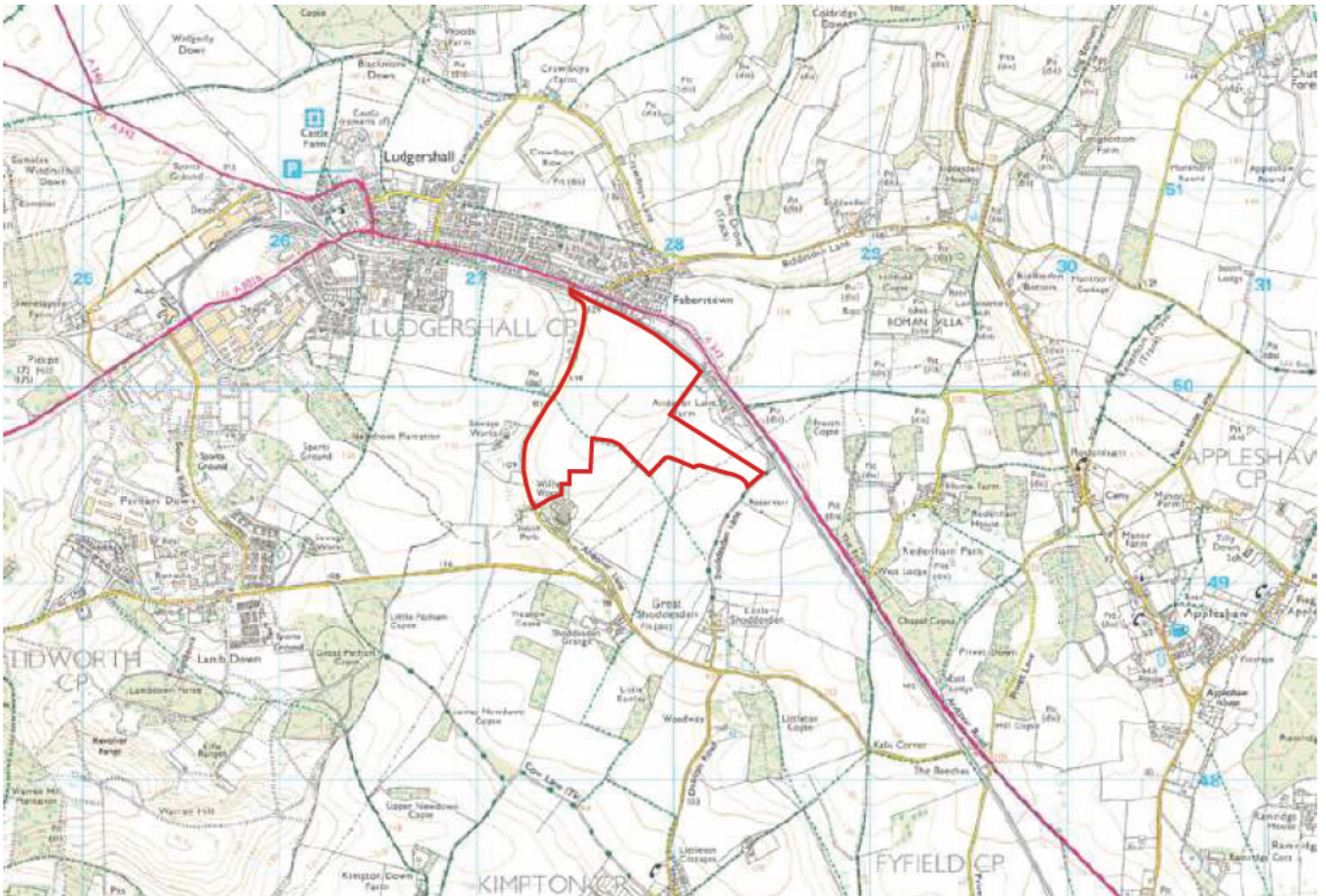


Photograph 4 View east from Shoddessen Lane north west of Willis Wood  
Dwellings o Andover Road A342



Photograph 5 View south from Andover Road A342 north of junction with Graspan Road

## LOCATION PLAN



## AERIAL PHOTOGRAPH



## LANDSCAPE AND VISUAL OVERVIEW

|  |   |
|--|---|
| LANDSCAPE POLICY AND LANDSCAPE CHARACTER | Falls within the North West Hampshire Downs LCA.  |
| HERITAGE ASSETS                          | The Grade II* Listed Redenham House to the east and a number of Grade II Listed buildings to the south around Little Shoddesdon and Reddenham. The remains of a Roman villa at Lambourne's Hill to the north east is a Scheduled Monument.  |
| PUBLIC RIGHTS OF WAY                     | Footpath 130/7/1 crosses the Area from north west to south east before splitting into Footpaths 130/7/2 and 130/501/1 to the south of the Area.   |
| TOPOGRAPHY                               | The Area lies on the eastern slope of a shallow valley which rises either side of Shoddesdon Lane. The land to the west of the lane rises in the direction of existing settlement in Ludgershall. The northern part of the Area is broadly flat at around 125m AOD, with the topography falling to the south and south east to around 105m AOD in the vicinity of Willis Wood at the southern Area boundary. The land rises to the north to 184m AOD at Wick Down and to the south west to 175m at Warren Hill. |
| LANDSCAPE QUALITY/SENSITIVITY            | Medium  |
| LANDSCAPE VALUE                          | Moderate  |
| VISUAL SENSITIVITY                       | Moderate - High   |
| RELATIONSHIP TO URBAN AREA               | The area is poorly related to the existing settlement in Ludgershall. However, draft Policy 40 of the emerging Wiltshire Local Plan Review would extend Ludgershall to the west of Shoddesdon Lane. Notwithstanding this, development to the east of the lane would extend the settlement onto the neighbouring flank of the valley and would represent a significant expansion into relatively open and rural farmland at the edge of the settlement.  |

### AREA DESCRIPTION

The Area occupies three large arable fields to the east of Shoddesdon Lane. Together these form a roughly triangular piece of land lying between Shoddesdon Lane and the Andover - Tidworth branch railway, albeit with a slice omitted near the railway in the eastern corner near the fuel station on Andover Road. It is bordered on its southern boundary by a narrow tree belt. On its north-eastern boundary it is bordered by a combination of trees along the railway embankment to the north and a gappy hedgerow to the south around the omitted slice. On the north-western boundary it is bordered by a gappy hedgerow with some hedgerow trees. To the north west is residential development between Andover Road and Biddesden Lane with lines development continuing alongside the railway line on the northern edge of the Area. To the south west are larger more open fields.

The Site occupies rising ground on the eastern edge of Shoddesdon Lane. The land to the west of the lane rises in the direction of the main part of Ludgershall, with the Site somewhat remote from the settlement. However, the intervening land is identified as a draft site allocation for 1,220 houses and 0.7ha of employment land (Policy 40: Land south east of Ludgershall Way) in the Wiltshire Local Plan Review Pre-submission Draft 2020 - 2038.

The area has a distinctly rural character with limited intrusion from existing settlement in Ludgershall. The railway and associated treed embankments separate the Area from the linear development to the north which extends east of Ludgershall on Andover Road. The Area is visible from Shoddesdon Lane and there are open views from Footpath 130/7/1 which crosses the Area from north west to south east.

### ABILITY OF THE AREA TO ACCOMMODATE RESIDENTIAL DEVELOPMENT

Development within Area 5 would result in an expansion to the south east of the existing settlement. It could form part of a wider planned development in conjunction with the draft allocation at Land south east of Empress Way as identified in the emerging Wiltshire Local Plan Review. However, development within Area 5 would extend the settlement beyond Shoddesdon Lane, with the falling landform along the route of the road providing a robust and logical boundary to expansion south east of Ludgershall. Further growth to the east of the lane would extend the settlement onto the adjacent valley side and into open and relatively rural countryside at the edge of the settlement.

Development would be prominent in views from Shoddesdon Lane and from the network of public footpaths which cross the Area and the neighbouring farmland.

The proposed access from Andover Road would be via a bridge crossing over the railway line. This would require significant infrastructure and would be an incongruous and prominent feature when viewed from the approach to the settlement on Andover Road.

## CONCLUSION

Development on the Area would result in a significant expansion of Ludgershall beyond Shoddesden Lane which forms a robust boundary to growth to the south east of the settlement. Housing to the east of the road would extend onto open countryside on rising ground above the lane and would be visible from local roads and a number of public footpaths which cross the Area. The proposed access over the railway line would require significant infrastructure and would be a visible and incongruous element in views from Andover Road.

## 4: COMPARATIVE ANALYSIS AND CONCLUSIONS

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- 4.1 Test Valley Borough Council have published the draft Local Plan 2040 Regulation 18 Stage 2. This identifies a number of potential strategic site allocations on the periphery of Andover and Ludgershall. As part of the evidence base to support the new Local Plan the Council have produced a Landscape Sensitivity Study (2024) which assesses the landscape sensitivity of a number of development options put forward through the SHELAA process.
- 4.2 Taylor Wimpey UK Limited are promoting land at Finkley Down Farm, Andover (North East Andover) as a residential led site allocation. However, the site at Finkley Down Farm has not been identified as site allocation in the draft Local Plan. Despite not being included the Council's Site Appraisal concluded in respect of Finkley Down Farm, *'This location has landscape sensitivity and relationship to the AONB but can be addressed by concentrating development to the west of the site and through landscaping'*.
- 4.3 The Council's Landscape Sensitivity Assessment identified a number of landscape and visual sensitivities in respect of the proposed site allocations, as well as the site at Finkley Down Farm as discussed in Section 2 of this report. The site at Finkley Down Farm is located in the south west of a larger parcel assessed in the sensitivity assessment. It is adjacent to the East Anton MDA which is now substantially built out, and vehicular access would be from the existing highway network within the MDA. The sensitivity assessment concluded that whilst the eastern part of the wider parcel borders the North Wessex Downs National Landscape, the western part is considered to be degraded due to its proximity to the existing settlement edge and is of *'...markedly lower landscape value'*. The assessment concluded that although the wider parcel was of high landscape sensitivity, land in the west and south west was of **moderate** sensitivity *'... by virtue of lower elevation, relative visual containment, settlement edge influence and the presence of large-scale infrastructure.'* These conclusions are consistent with our own findings which found that development adjacent to the MDA would relate well to existing settlement on the urban fringe and would be well contained in views from the wider landscape to the north and east.
- 4.4 The Council's landscape sensitivity assessment concluded that the land to the north of Andover has a **high** landscape sensitivity to residential development. It identifies a number of landscape and visual constraints to development in this location, including its rural qualities, sense of separation from Andover, extensive intervisibility with the wider landscape and the public right of way network, and its role in providing a setting and separation to Enham Alamein and the listed buildings at Knights Enham. Again, these conclusions are supported by our own findings, which noted that development here would be poorly related to existing settlement in Andover and would extend into open countryside with few visual detractors. In addition, it would be visible from the surrounding footpath network and the approaches on a number of rural roads and lanes.
- 4.5 The Council's sensitivity assessment assessed the land at Bere Hill as being of medium-high sensitivity overall, although moderate sensitivity to the east in the vicinity of Picket Twenty and south along the route of the A303. It describes this parcel as a relatively commonplace landscape, containing local landmarks such as Ladies Walk and Iron Bridge and that it makes some contribution to the setting of Andover. Our own assessment found that due to the level change along the route of Ladies Walk, housing in this location would extend built development above the 'Andover Bowl' which has previously

contained development in the town. Housing here would therefore be at odds with the established settlement pattern. Development close to the ridgeline would also be prominent in views south from locations within the settlement. There are far reaching views available north and east from Ladies Walk and any development in this location would need to sensitively consider the setting of the footpath.

- 4.6 The site allocations at Ludgershall are assessed in the Council's sensitivity assessment as being of **moderate - high** landscape sensitivity. The assessment notes that the parcel to the east of the settlement is of National landscape value due to sharing some qualities with the adjacent north Wessex Downs National Landscape. It also states that the southern parcel *'...is more open and visually exposed and therefore more constrained in landscape and visual terms to any future potential development.'* our assessment found that development east of Ludgershall is in the immediate setting of the National Landscape and would extend built development to the boundary with the National Landscape. It would also be visible in views from Biddesden Lane at the edge of the National Landscape.
- 4.7 Development to the south east of Ludgershall could form part of a wider planned development in conjunction with the draft allocation at Land south east of Empress Way as identified in the emerging Wiltshire Local Plan Review. However, development would extend the settlement beyond Shoddesden Lane, with the falling landform along the route of the road providing a robust boundary to expansion south east of Ludgershall. Further growth to the east of the lane would extend the settlement onto the adjacent valley side and into open and relatively rural countryside at the edge of the settlement. Development would be prominent in views from Shoddesden Lane and from the network of public footpaths which cross the Area and the neighbouring farmland.
- 4.8 Based on the findings of the Council's landscape sensitivity assessment the land at Manor Farm is assessed as being the most sensitive in landscape and visual terms of the options considered in this report, with a high landscape sensitivity to potential development. The sites at Ludgershall are assessed as being of moderate - high landscape sensitivity. The land at Bere Hill is assessed as moderate - high and moderate landscape sensitivity. In contrast, the land at Finkley Farm, which lies within the south west of the wider parcel, is assessed as being of moderate landscape sensitivity. Based on the Council's own findings, the land at Finkley Down Farm therefore presents one of the least sensitive options in landscape and visual terms for strategic scale growth in the borough.

# APPENDIX A: METHODOLOGY

## Landscape and Visual Methodology

- i In landscape and visual impact assessment, a distinction is normally drawn between landscape/townscape effects (i.e. Effects on the character or quality of the landscape (or townscape), irrespective of whether there are any views of the landscape, or viewers to see them) and visual effects (i.e. Effects on people's views of the landscape, principally from residential properties, but also from public rights of way and other areas with public access). Thus, a development may have extensive landscape effects but few visual effects (if, for example, there are no properties or public viewpoints nearby), or few landscape effects but substantial visual effects (if, for example, the landscape is already degraded or the development is not out of character with it, but can clearly be seen from many residential properties and/or public areas).
- ii The assessment of landscape & visual effects is less amenable to scientific or statistical analysis than some environmental topics and inherently contains an element of subjectivity. However, the assessment should still be undertaken in a logical, consistent and rigorous manner, based on experience and judgement, and any conclusions should be able to demonstrate a clear rationale. To this end, various guidelines have been published, the most relevant of which (for assessments of the effects of a development, rather than of the character or quality of the landscape itself), form the basis of the assessment and are as follows:
  - 'Guidelines for Landscape & Visual Impact Assessment', produced jointly by the Institute of Environmental Assessment and the Landscape Institute (GLVIA 3rd edition 2013); and
  - 'An Approach to Landscape Character Assessment', October 2014 (Christine Tudor, Natural England) to which reference is also made. This stresses the need for a holistic assessment of landscape character, including physical, biological and social factors.
  - 'Assessing Landscape Value Outside National Designations', Landscape Institute's Technical Guidance Note 02/21

## Landscape/Townscape Quality and Sensitivity

- iii Landscape/townscape quality is a subjective judgement based on the value and significance of a landscape/townscape. It will often be informed by national, regional or local designations made upon it in respect of its quality e.g. AONB. Sensitivity relates to the ability of that landscape/townscape to accommodate change.
- iv Landscape sensitivity can vary with:
  - (i) existing land use;
  - (ii) the pattern and scale of the landscape;
  - (iii) visual enclosure/openness of views, and distribution of visual receptors;
  - (iv) the scope for mitigation, which would be in character with the existing landscape; and
  - (v) the value placed on the landscape.

- v There is a strong inter-relationship between landscape/townscape quality and sensitivity as high quality landscapes/townscapes usually have a low ability to accommodate change.
- vi For the purpose of our appraisal, landscape/townscape quality and sensitivity has been combined

| Table 2.1<br>Landscape<br>Quality/Sensitivity | Description   |
|---|---|
| <b>Very High</b>                              | <p><b>Landscape Quality:</b> Intact and very attractive landscape which may be nationally recognised/ designated for its scenic beauty.<br/>e.g. National Park or Area of Outstanding Natural Beauty</p> <p><b>Townscape Quality:</b> A townscape of very high quality which is unique in its character, and recognised nationally/internationally.<br/>e.g. World Heritage Site</p> <p><b>Sensitivity:</b> A landscape/townscape with a very low ability to accommodate change because such change would lead to a significant loss of valuable features or elements, resulting in a significant loss of character and quality. Development of the type proposed would be discordant and prominent.</p>  |
| <b>High</b>                                   | <p><b>Landscape Quality:</b> A landscape, usually combining varied topography, historic features and few visual detractors. A landscape known and cherished by many people from across the region.<br/>e.g. County Landscape Site such as a Special Landscape Area</p> <p><b>Townscape Quality:</b> A well designed townscape of high quality with a locally recognised and distinctive character e.g. Conservation Area</p> <p><b>Sensitivity:</b> A landscape/townscape with limited ability to accommodate change because such change would lead to some loss of valuable features or elements, resulting in a significant loss of character and quality. Development of the type proposed would likely be discordant with the character of the landscape/townscape.</p> |
| <b>Medium</b>                                 | <p><b>Landscape Quality:</b> Non-designated landscape area, generally pleasant but with no distinctive features, often displaying relatively ordinary characteristics.</p> <p><b>Townscape Quality:</b> A typical, pleasant townscape with a coherent urban form but with no distinguishing features or designation for quality.</p> <p><b>Sensitivity:</b> A landscape/townscape with reasonable ability to accommodate change. Change would lead to a limited loss of some features or elements, resulting in some loss of character and quality. Development of the type proposed would not be especially discordant.</p>  |
| <b>Low</b>                                    | <p><b>Landscape / Townscape Quality:</b> Unattractive or degraded landscape/townscape, affected by numerous detracting elements e.g. industrial areas, infrastructure routes and un-restored mineral extractions.</p> <p><b>Sensitivity:</b> A landscape/townscape with good ability to accommodate change. Change would not lead to a significant loss of features or elements, and there would be no significant loss of character or quality. Development of the type proposed would not be discordant with the landscape/townscape in which it is set.</p>  |

Footnote:

A distinction has been drawn between landscape/townscape quality and sensitivity. Quality is a subjective judgement on perception and value of a landscape/townscape and may be informed by any national, regional or local designations for its quality. Sensitivity relates to the ability of that landscape/townscape to accommodate change.

and is assessed using the criteria in Table 2.1. Typically, landscapes/townscape which carry a quality designation and which are otherwise attractive or unspoilt will in general be more sensitive, while those which are less attractive or already affected by significant visual detractors and disturbance will be generally less sensitive.

## Landscape/Townscape Value

vi Landscape Value is described by the GLVIA as:

*'The relative value that is attached to different landscapes by society. A landscape may be valued by different stakeholders for a whole variety of reasons.'*

vii The value of a landscape can most easily be attributed to international, national or local designations for landscape character (e.g. Area of Outstanding Natural Beauty (AONB)) however, current guidance acknowledges the value of undesignated landscapes. Accordingly, although designations are a starting point, other considerations may include perceptual factors (e.g. Scenic beauty, scale, remoteness, wildness etc.), Cultural/historical associations and public accessibility.

viii Table 2.2 sets out the assessment criteria that has been utilised for establishing the relative landscape value of the Area's.

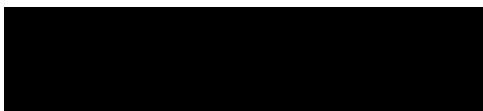
| Table 2.2<br>Landscape Value | Description   |
|------------------------------|---|
| <b>High</b>                  | Very attractive/rare landscape of international/national importance e.g. World Heritage Site/National Park/AONB.  |
| <b>Moderate-High</b>         | Attractive landscape possessing scenic beauty and intact landscape structure and perceptual qualities valued at a national/regional level. Can form setting for heritage assets and may have other important cultural/historical associations, e.g. National Park/AONB. |
| <b>Moderate</b>              | A pleasant usually non-designated landscape of good/moderate landscape quality. Value expressed through local/cultural associations or by demonstrable use. May possess other perceptual qualities likely to be valued at a District level.                             |
| <b>Moderate-Low</b>          | An ordinary landscape of moderate or low landscape quality subject to a number of detracting elements and in relatively poor condition. May have limited public access and few obvious cultural/historical associations at a district/local level.                      |
| <b>Low</b>                   | Unattractive or degraded landscape with limited public access or known cultural associations.   |

## Visual Sensitivity

- ix The study considers the visual sensitivity of each of the identified Areas. The visual sensitivity of each Area is assessed against a number of factors. These include the following:
- **Enclosure:** This is the degree to which the individual Areas are enclosed by vegetation or landform or a combination of both.
  - **Sensitivity of Receptors:** This is the individual sensitivity of the individual viewpoints. For instance, people using a public right of way in the countryside will tend to have a higher sensitivity than someone in their place of work.
  - **Number of Visual Receptors:** The number of people likely to perceive visual changes.
  - **Orientation:** The proposed orientation of potential development. For instance, is it located on sloping ground facing the existing urban area or, conversely is it outward facing and conspicuous in views from the wider countryside. Development which is orientated towards the wider landscape is likely to be more visually sensitive than proposals which are more closely related to the existing settlement.
  - **Potential for Mitigation:** The degree to which visual effects can be mitigated by appropriate landscape mitigation measures. Mitigation measures must be in keeping with the scale and landscape character of the wider landscape.
- x The table below sets out the Visual Sensitivity criteria.

| Table 2.3<br>Visual Sensitivity | Description   |
|---------------------------------|---|
| <b>High</b>                     | The Area is highly exposed and visible from a high number of sensitive receptors both locally and from long distance viewpoints. There are limited opportunities to provide appropriate landscape mitigation.   |
| <b>Moderate-High</b>            | The Area has little enclosure and is visible from a high number of high and medium sensitivity receptors. Landscape mitigation would have limited effect in offsetting the harm resulting from development on the available views.  |
| <b>Moderate</b>                 | The Area benefits from some containment within the surrounding landscape. There may be some distant views of parts of the Area from sensitive receptors and a number of localised views from receptors of a moderate and high sensitivity. There are some opportunities to provide mitigation, however the visual effects could not wholly be offset.     |
| <b>Moderate-Low</b>             | The Area is well enclosed by either landform or vegetation. Views tend to be restricted and limited to predominately moderate and low sensitivity receptors, although there may be restricted views from higher sensitivity receptors. Landscape mitigation would minimise visual effects and would be in keeping with the adjoining landscape character. |
| <b>Low</b>                      | There are few views available from the surrounding area owing to the containment of the Area. Where partial views do occur these tend to be limited to moderate or low sensitivity receptors.   |







## **APPENDIX 3**

### **Transport Representations**

A Planning Application by  
**TAYLOR WIMPEY UK LIMITED**

In respect of  
**Finkley Down Farm,  
ANDOVER**

**Transport Representation**

March 2024



Document Management

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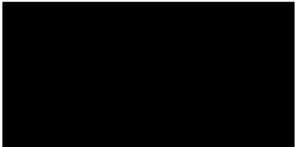
Document Review

|    | Status                | Author | Checker | Approver | Date         |
|----|-----------------------|--------|---------|----------|--------------|
| 01 | Draft                 | AC     | SM      | JD       | 13   03   24 |
| -  | Issue                 | AC     | SM      | JD       | 27   03   24 |
| A  | Revision <sup>a</sup> |        |         |          |              |
| B  | Revision <sup>b</sup> |        |         |          |              |
|    |                       |        |         |          |              |
|    |                       |        |         |          |              |

Issued by:

Bristol  
Cambridge  
London  
Oxford  
Welwyn Garden City

Transport Planning Associates



<sup>a</sup>  
<sup>b</sup>

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# 1 Introduction

- 1.1 This representation has been prepared by Transport Planning Associates (TPA) on behalf of Taylor Wimpey UK Ltd (the 'Client') in relation to the potential allocation of Land at Finkley Down Farm (the 'Site').
- 1.2 Land at Finkley Down Farm has been identified within the preferred pool of sites within the *Sustainability Appraisal of the Test Valley Local Plan 2040: Interim SA Report (Regulation 18 Stage 2)* document. However, the Site has not been taken forward and included within the resulting *Draft Test Valley Local Plan 2040 (Regulation 18 Stage 2)* document.
- 1.3 This representation addresses the omission of Land at Finkley Down Farm from the *Draft Test Valley Local Plan 2040 (Regulation 18 Stage 2)* and includes a transport specific critical review of the evidence base and site selection process used to select the draft allocation sites. The evidence provided within this representation demonstrates that the site selection process is flawed and that Land at Finkley Down Farm should be included within *The Test Valley Local Plan 2040*.
- 1.4 This representation is structured as follows:
- A critical review of the sustainability appraisal and its conclusions;
  - A critical review of the Transport Assessment Strategic Modelling results; and
  - Summary and conclusions

## 2 Review of Sustainability Appraisal

- 2.1 This section provides a critical review of the *Sustainability Appraisal of the Test Valley Local Plan 2040: Interim SA Report (Regulation 18 Stage 2)*.

### Overview of the Sustainability Appraisal

- 2.2 The *Sustainability Appraisal of the Test Valley Local Plan 2040: Interim SA Report (Regulation 18 Stage 2)* was prepared following the responses received at Regulation 18 Stage 1. The report also takes into account the overarching objectives of the Local Plan, which states the following in reference to transport:

***"Transport and Movement** – Encourage active and sustainable modes of transport, that are accessible, safe and attractive to use, whilst also seeking to reduce the impact of travel in particular by private car. Ensure new development facilitates improvements to accessibility, safety and connectivity in our transport infrastructure."*

- 2.3 Furthermore, the scope of the Sustainability Appraisal (SA) includes the following:
- **Accessibility** – Maintain and improve access to services, facilities, and other infrastructure, whilst improving the efficiency and integration of transport networks and the availability and utilisation of sustainable modes of travel;
  - **Transport** – Achieve a sustainable and integrated transport system.
- 2.4 The SA report examines the housing growth separately for the Northern and Southern Test Valley regions, as this note's focus is Land at Finkley Down Farm, the focus of the analysis will be upon Northern Test Valley results.
- 2.5 The site's taken forward for assessment within the SA report went through a five-stage selection process including individual merits from the Test Valley Strategic Housing and Economic Land Availability Assessment (SHELAA), site size threshold where development under 10 dwellings were discounted, site constraints, consistency with strategic factors, and lastly, site appraisals informed through evidence base and technical assessments submitted by site promoters.
- 2.6 The resulting site pool for the northern test valley area was as follows:
- Land at Manor Farm (Capacity of 800-900 dwellings);
  - Land at Bere Hill Farm (Capacity of 300-600 dwellings);

- Land at Bere Hill and Bayliffs Bottom (Capacity of 800 dwellings);
- Land at Finkley Down (Capacity of 900 dwellings);
- Land South of London Road (Capacity of 90 dwellings);
- Penton Corner (Capacity of 210 dwellings);
- Land South of Forest Lane (270 dwellings);
- Land East of Ludgershall (Capacity of 350 dwellings); and
- Land South of A342/East Shoddeshden Lane (Capacity of 1,150 dwellings).

2.7 Apart from Land South of London Road and Land at Bere Hill and Bayliffs Bottom, all other sites were identified as 'variable' site options across the growth scenarios. These 'variable' sites were then ranked in preference of allocations to come forward. The ranking is set out as follows:

1. Land at Manor Farm (800 - 900 dwellings)
2. Land at Bere Hill Farm (300 - 600 dwellings)
3. Land east of Ludgershall (350 homes dwellings)
4. Land south of A342 and east Shoddeshden Lane, Ludgershall (1,150 dwellings)
5. Land at Finkley Down Farm, Andover (900 dwellings)
6. Land south of Forest Lane, Andover (270 dwellings)
7. Penton Corner (west of Andover) (210 dwellings)

2.8 From a transport and accessibility perspective, it is unclear as to why Land at Finkley Down Farm is only ranked in fifth position, particularly given the evidence provided in *Appendix IV Housing Site Appraisals*, which demonstrates the site excellent level of accessibility.

2.9 The Housing Sites Appraisals, which is appended as Appendix IV of the *Sustainability Appraisal of the Test Valley Local Plan 2040: Interim SA Report (Regulation 18 Stage 2)*, forms part of the final stage of the Interim Sustainability Report in order to recommend allocations to be taken forward for the sustainability appraisal.

2.10 Each development was assessed by their performance across a wide range of assessment criteria to align with the Sustainability Appraisal objectives. The site's performance was ranked on a scale from 'Strongly Positive' to 'Strongly Negative' and is replicated in **Table 3.1** below.

Table 2.1 Performance Rating Scale

| Performance Rating        | Key |
|---------------------------|-----|
| Strongly Positive         | ++  |
| Positive                  | +   |
| Mixed performance         | +/- |
| Negative                  | -   |
| Strongly Negative         | --  |
| Depends on implementation | i   |
| Uncertain                 | ?   |
| No effect                 | O   |

2.11 With regard to transport and accessibility, a number of criteria were assessed including site access, accessibility by sustainable modes of transport, proximity to key facilities including nursery, primary and secondary schools, healthcare and community facilities, as well as connections onto cycleways and footpath networks.

2.12 As demonstrated in **Table 2.2**, Finkley Down Farm ranks second in all the sites, just behind Land at Bere Hill when taking the transport related objectives into account

Table 2.2 SA Transport Objectives (2, 3, and 11) Scoring Summary

| Site                     | Units | ++ | + |
|--------------------------|-------|----|---|
| Land at Bere Hill        | 450   | 8  | 3 |
| Finkley Down Farm        | 1,450 | 8  | 1 |
| Land at Bere Hill Farm   | 700   | 4  | 2 |
| Land at Manor Farm       | 1,000 | 3  | 6 |
| Land East of Ludgershall | 350   | 3  | 3 |
| Land South of A342       | 1,500 | 2  | 2 |

2.13 The council's assessment doesn't include the proposals set out in the Finkley Down indicative masterplan which would further enhance the sustainability of the site. **Table 2.3** shows how rankings for Land at Finkley Down Farm would be recalibrated if the masterplan proposals were included.

Table 2.3 SA Transport Objectives (2, 3, and 11) Scoring Summary

| SA Objective | Criteria   | Housing Appraisal Ranking | Re-evaluated Ranking | Reason  |
|--------------|--|---------------------------|----------------------|---|
| Objective 3  | Is the site accessible to early years education? | +/-                       | ++                   | Through the provision of a pedestrian link to the west, the site will be within 800m of Finkley Down Farm Nursery and Pre School (located adjacent to site) |
| Objective 12 | Is the site accessible to open space?            | +                         | ++                   | Presence of two existing playgrounds and open space within 800m, and an additional playground and open space are proposed as part of the development        |
|              | Is the site accessible to sport facilities?      | -                         | ++                   | The site is within a 2km walk of East Anton Sport Ground and as part of the development proposal, there will be open playing fields with a pavilion         |

- 2.14 The addition of the 'Strongly Positive' ranking of access to early years education improves Finkley Down Farm's overall transport objective ranking and places it as the highest ranked site in terms of the SA transport objectives.
- 2.15 The Finkley Down Farm site also offers the opportunity to extend the existing number 6 service operated by Stagecoach and create a bus loop through the site via Finkley Down Road and Skein Road.
- 2.16 Despite the positive scoring that Finkley Down Farm received for transport and accessibility, the housing appraisal recommended the site not be taken forward as an allocation and that the "*transport impacts in this area have potential to cause significant issues on the local highway network and Enham Arch*". We don't agree with this conclusion, the traffic modelling doesn't support this (see section 3 of this note), the highly accessible nature of the site means that any impact can be mitigated through modal shift and the uptake of sustainable and active travel, and a scheme of this size would provide funds towards highway improvements if found necessary.
- 2.17 Whilst traffic from the proposed allocation 'Land at Manor Farm' would use the same highway network around Enham Arch as 'Finkley Down Farm', the housing appraisal did not raise the same concerns regarding traffic impact. This is further examined below.

### Land at Manor Farm

- 2.18 Land at Manor Farm is considered to be the preferred site allocation for Andover and was rated as such in the Sustainability Appraisal. However, the Sustainability Appraisal's transport objectives suggest Land at Finkley Down Farm performs much better, as demonstrated in **Table 2.2**.
- 2.19 In relation to Objective 3's criteria, Land at Manor Farm scored as 'Mixed performance' for accessibility to early years education provision, secondary school, convenience stores and a primary healthcare facility.
- 2.20 Furthermore, the ability for the site to connect to the local highway was considered to be 'Negative' with access constraints identified. Land at Finkley Down Farm scored a 'Positive' for site access, which provides confidence in its deliverability.
- 2.21 Both criteria in Objective 12 'accessibility to open space and sports facilities', ranks as 'Negative' for Land at Manor Farm.
- 2.22 Despite the mixed rankings for accessibility, the commentary for Land at Manor Farm concludes that the "*site is located with good accessibility to essential services and amenities*". Even though Finkley Down

Farm benefits from higher levels of accessibility by sustainable and active travel modes both sites were scored the same.

- 2.23 Despite the Sustainability Appraisal stating at paragraph 6.168 that *"Manor Farm is a constant across all scenarios and would affect the capacity of both Churchill Way West and Enham Arch"*, the summary for Land at Manor Farm included in the Housing Appraisal makes no comment regarding the site's transport impact at Enham Arch.

### Land East of Ludgershall and Land South of A342

- 2.24 Both Land East of Ludgershall and Land South of the A342 were preferred options to Land at Finkley Down Farm within the Sustainability Appraisal, despite them scoring much lower on the SA Transport Objectives presented in **Table 2.2** and having much lower potential to encourage the uptake of sustainable and active travel modes. This brings in to question the rank of the sites within the Sustainability Appraisal.
- 2.25 With regard to sites located in Ludgershall, the Sustainability Appraisal at paragraph 6.1.69 states that *"traffic volumes along the A342 which serves Ludgershall show an increase in additional vehicle movements associated with growth scenarios 1, 2 and 3"*. It goes on to state that there are however *"no issues with capacity on this part of the network to cope with these additional movements"*. This comment demonstrates that Test Valley is content to include less sustainable sites which generate higher levels of traffic so long as there are no capacity issues. This is, contradictory to a 'Decide and Provide' approach and environmental policies, which would favour site's such as Finkley Down Farm, with a much greater potential to increase the uptake of sustainable and active travel modes and lower dependence on the private car.
- 2.26 Walking and cycling catchments for the sites located in Ludgershall and Finkley Down Farm are plotted and, shown in **Figure 2.1** and **Figure 2.2** respectively.

Figure 2.1 Comparison of 20 Minute Walk Catchments

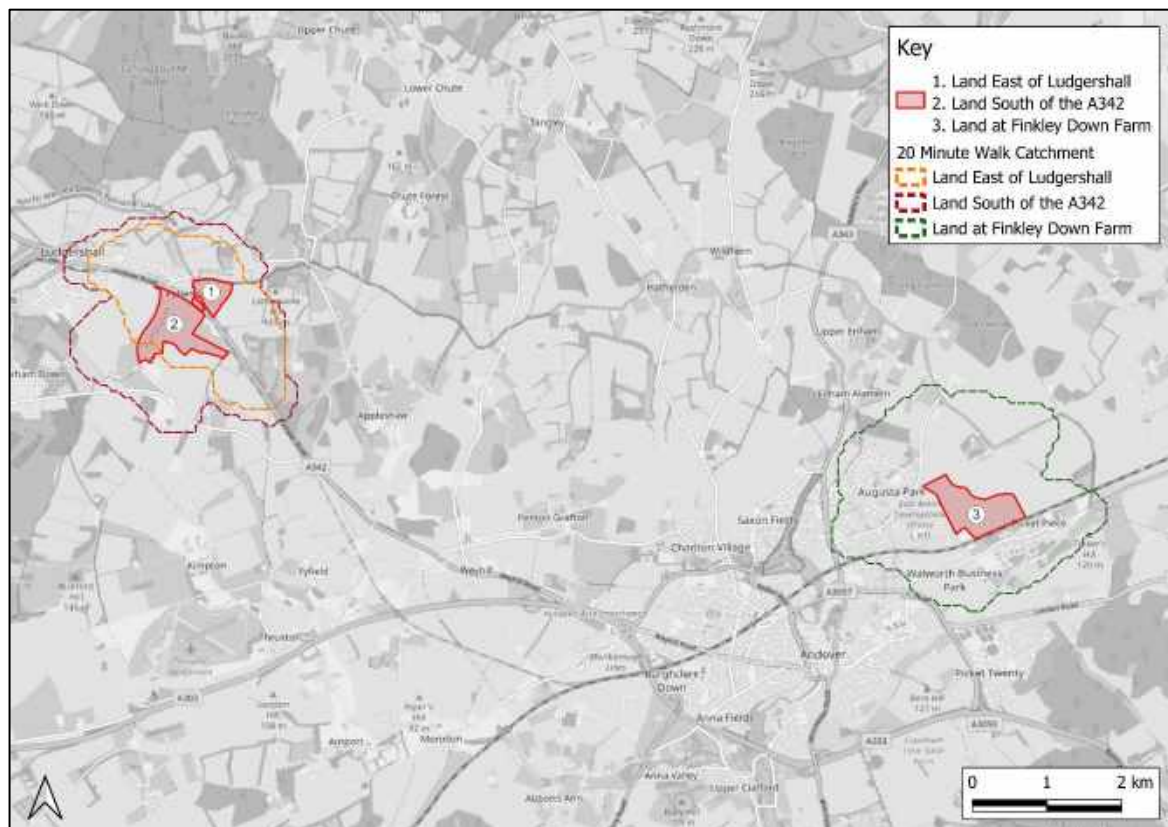
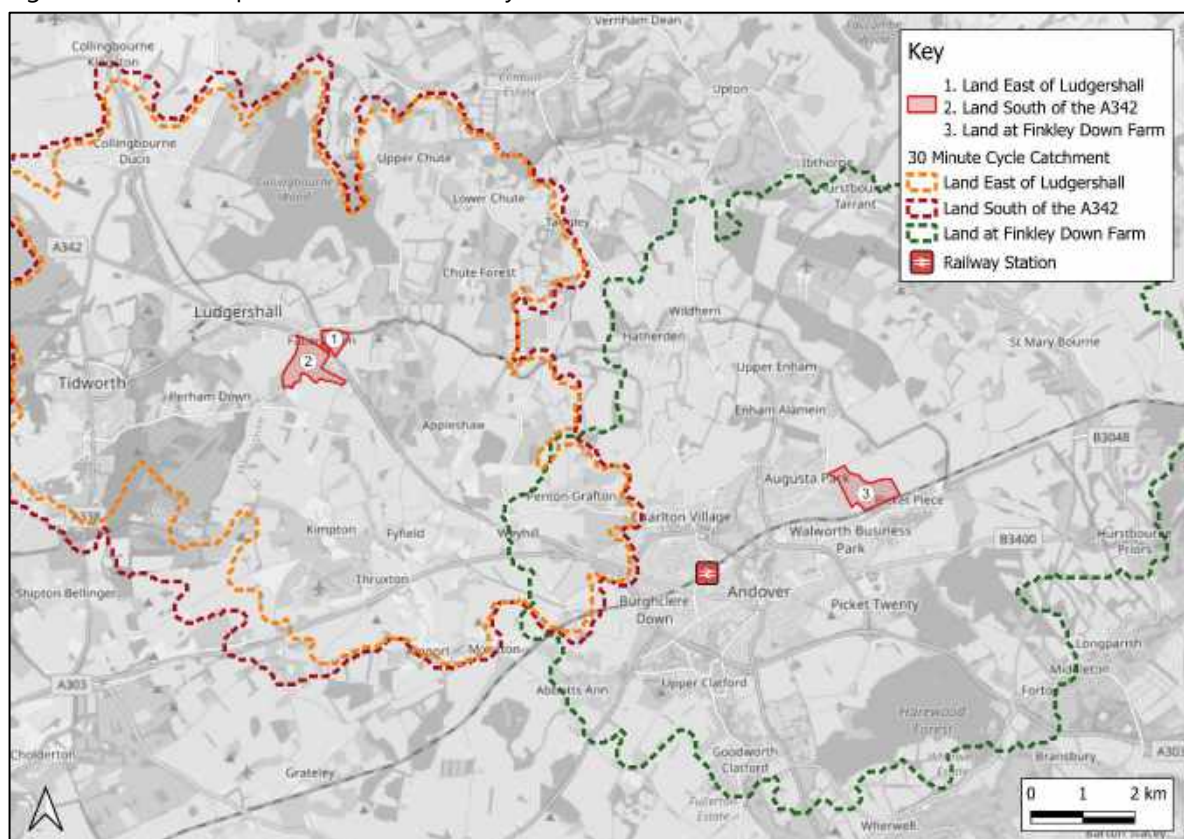


Figure 2.2 Comparison of 30 Minute Cycle Catchments



- 2.27 The walk catchments for the sites at Ludgershall only include Ludgershall, whereas Finkley Down Farm walk catchment includes facilities and amenities in Andover and the Walworth Business Park to the south of the site. A 30-minute cycle from the sites at Ludgershall only reaches the outskirts of Andover, whereas the entirety of Andover, including the railway station, are well within a 30-minute cycle of Finkley Down Farm.

## Conclusion

- 2.28 Finkley Down Farm offers a wider range of active travel opportunities to reach key facilities and employment areas in comparison to the sites at Ludgershall and Land at Manor farm. At Ludgershall realistically residents would not be able to use active travel modes to reach Andover and the railway station reducing its propensity to promote modal shift.
- 2.29 Land at Finkley Down Farm scores higher within the transport objectives compared to other sites including Manor Farm. Manor Farm is constant in all growth scenarios but given the scoring for Finkley Down Farm it is unclear as to why it is not included as a constant across all scenarios in place of Land at Manor Farm. At the very least a new scenario should be added with Finkley Down Farm full development but without Manor Farm.

### 3 Review of Strategic Modelling Results

- 3.1 This section provides a critical review of the growth options and results provided within *Test Valley Local Plan 2040 Preliminary Transport Assessment* dated January 2024.

#### Growth Options

- 3.2 The *Test Valley Local Plan 2040 Preliminary Transport Assessment*, assess two growth options comprising a combination of sites that have been selected for further assessment. The residential developments included within these growth options is presented in Table 6-1 of the Transport Assessment and reproduced in **Table 3.1**.

Table 3.1 Residential sites included within Growth Options 1 and 2 tested within Transport Assessment

| SHELAA Ref.              | Site Name   | Growth Option 1 (dwells) | Growth Option 2 (dwellings) |
|--------------------------|---|--------------------------|-----------------------------|
| 61                       | Land east of Ludgershall                              | 350                      | 350                         |
| 154                      | Land south of bypass                                  | 110                      | 110                         |
| 165                      | Land at Finkley Down Farm                             | 900                      |                             |
| 153                      | Field's Farm  |                          | 120                         |
| 173                      | Land at Manor Farm                                    | 800                      | 800                         |
| 247                      | Land at Bere Hill Farm                                | 600                      | 400                         |
| 284                      | Land at Ganger Farm South                             | 340                      | 80                          |
| 295                      | Land N King Edward Park St James Park Wheelhouse Park | 44                       | 44                          |
| 324                      | Land south of A342 and east of Shoddesden Lane        |                          | 1,150                       |
| 338                      | Land south of Forest Lane                             | 270                      |                             |
| 344                      | Brentry Nursery Jermyns Lane                          |                          | 250                         |
| 139_282_356_370          | Halterworth   |                          | 1,150                       |
| 167_419                  | Land at Bere Hill and Bayliffs Bottom                 | 792                      | 792                         |
| 19_255                   | Packridge Farm and land south of Hoe Lane             | 150                      |                             |
| 204_281_316              | Penton Corner   |                          | 210                         |
| 76_203_258_404_441       | Land south of London Road                             | 90                       | 90                          |
| 82_285                   | Velmore Farm / Castle Lane                            | 1,070                    |                             |
| <b>Total Residential</b> |   | <b>5,516 dwellings</b>   | <b>5,546 dwellings</b>      |

- 3.3 As shown in **Table 3.1**, the proposed Land at Finkley Down Farm option was tested for 900 dwellings within Growth Option 1, but omitted from Growth Option 2.

- 3.4 It is noted that Growth Option 1, which includes Land at Finkley Down Farm, also includes much higher levels of proposed employment land in the northern part of the district when compared to Growth Option 2. It should therefore be noted that the overall uplifts in total vehicles, travel distance and delay in Growth Option 1 are more likely to be as a result of the additional employment land rather than Land at Finkley Down Farm, which is located in a sustainable location.
- 3.5 Further to the review of the Sustainability Appraisal in Chapter 2 of this report and given the sustainable credentials of the Land at Finkley Down Farm site, it is strongly recommended that variations of Growth Option 2 are tested within the Transport Assessment, they are:
- Option 2 but with Land at Finkley Down Farm (full development) in place of Land at Manor Farm; and
  - Option 2 with Land at Finkley Down Farm (full development) but no Land south of A342 and east Shoddessen Lane, Ludgershall respectively.
- 3.6 It is also recommended that Growth Option 1 is tested with full development at Finkley Down Farm (1,450 dwellings).
- 3.7 Unlike the existing modelling, these tests should also take account of the reduced vehicle trip rates that will occur as result of the sustainable and active travel opportunities that Land at Finkley Down Farm provides.
- 3.8 It is concluded that without these additional options, Land at Finkley Down Farm has not been fairly assessed.

## Strategic Modelling Results

- 3.9 In terms of the general strategic modelling results the *Test Valley Local Plan 2040 Preliminary Transport Assessment* does not recommend a preference for either Growth Option 1 or Option 2 and ultimately either option could be delivered. Paragraph 6.166 states that “Overall, the transport modelling concludes that the network is able to accommodate additional traffic movements from the growth scenarios subject to appropriate mitigation to avoid significant effects”.
- 3.10 Growth Option 1, which includes both Land at Manor Farm and Land at Finkley Down Farm is stated to have an impact along the A343 to the north of Andover, particularly around Enham Arch Retail Park in the future 2040 DS1 scenario. However, while there will be an impact at this location, the Volume/Capacity results are still below theoretical capacity at 91% in both the AM and PM peak periods without mitigation and so demonstrates that delivery of both sites is still a realistic option.

- 3.11 As stated at paragraph 7.2.3 of the Transport Assessment, the purpose of the strategic modelling was *“to test the Local Plan spatial growth options and help identify high-level transport impacts and where mitigation may be required”*. Therefore, there is a clear opportunity to implement appropriate highway and sustainable transport mitigation that ensures the delivery of both Land at Manor Farm and the full Land at Finkley Down Farm site (1,450 dwellings) over inherently less sustainable sites such as those sites located in Ludgershall, which will have a greater reliance on the private car and much less potential for modal shift to sustainable and active travel modes.
- 3.12 The conclusions of the *Test Valley Local Plan 2040 Preliminary Transport Assessment* at paragraph 7.2.1 state:
- “Overall, the sites in close proximity to existing urban areas have good accessibility to key destinations and public transport services. The sites to the north of the borough situated around Andover have greater access to existing facilities and public transport”*.
- 3.13 This conclusion, again supports the sustainable and active transport potential of Land at Finkley Down Farm, which is located within walking and cycling distance of the facilities and amenities within Andover as well as existing bus provision and rail services available from Andover Railway Station. The Finkley Down Farm site also offers the opportunity to extend the existing number 6 service operated by Stagecoach and create a bus loop through the site via Finkley Down Road and Skein Road.
- 3.14 Over and above sites located in Ludgershall, Land at Finkley Down Farm presents much higher potential to mitigate highway impact through the delivery of a robust transport strategy, which promotes modal shift towards sustainable and active travel. This is in accordance with the *Test Valley Local Plan 2040 Preliminary Transport Assessment*, which, at paragraph 7.3, recommends a *“Decide & Provide approach that takes into account emerging travel trends and the proposed transport strategy for the site”*.
- 3.15 The *Test Valley Local Plan 2040 Preliminary Transport Assessment* also recommends that a more detailed study is carried out as part of the Local Plan transport evidence. It is therefore, strongly suggested that this is not just be based on existing trip assumptions and impacts on the existing transport infrastructure, as is currently the case. The study should also account for a site’s potential to enable future uptake of sustainable and active travel modes, that will inherently reduce the number of vehicle trips and impact on the highway network. In this respect, Land at Finkley Down Farm offers much greater potential for modal shift in comparison to sites included as allocations within the *Draft Test Valley Local Plan 2040 (Regulation 18 Stage 2)*, as reflected in **Chapter 2** of this report.

## 4 Conclusion

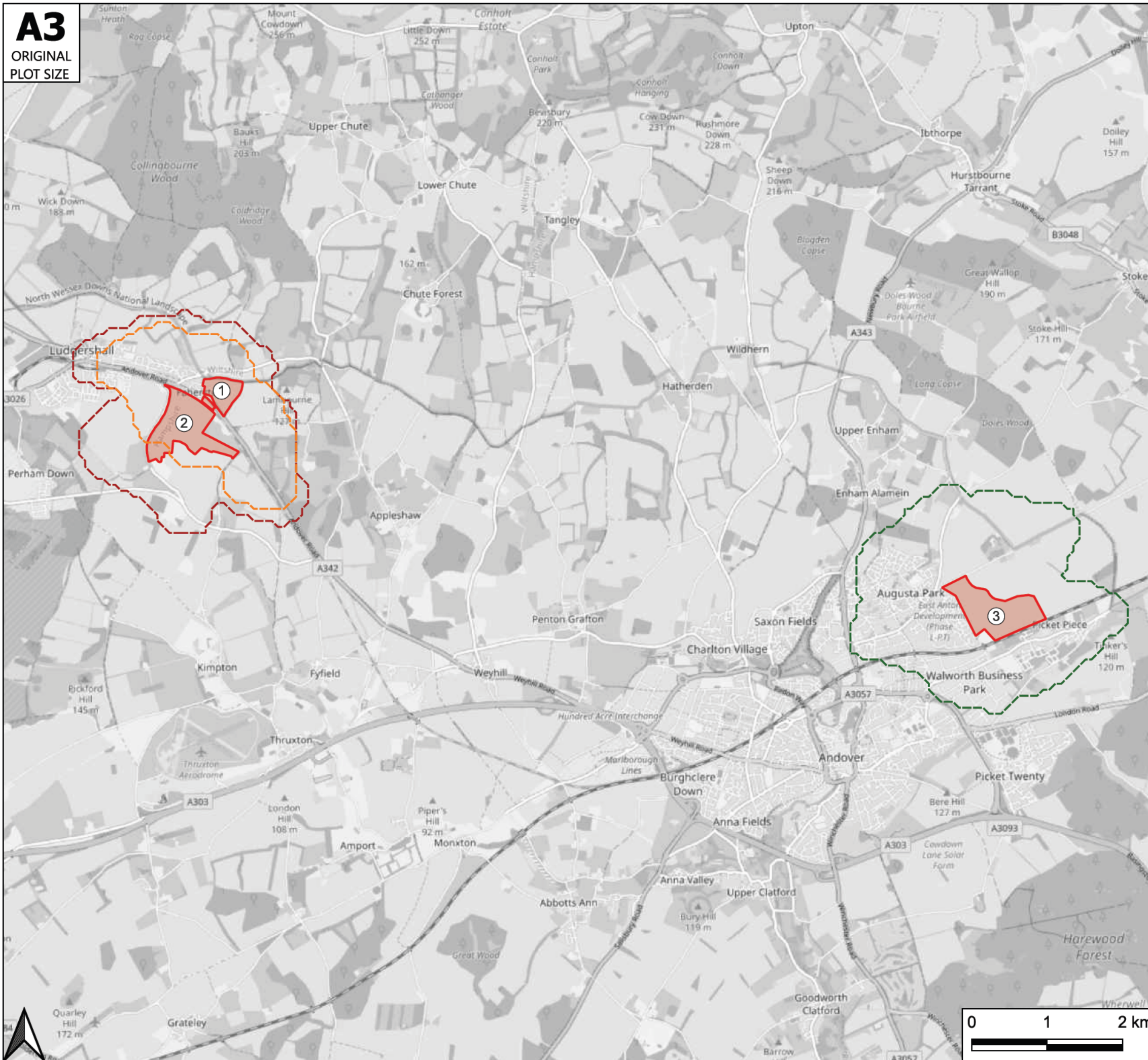
4.1 This representation has been prepared by Transport Planning Associates (TPA) on behalf of Taylor Wimpey UK Ltd (the 'Client') in relation to the potential allocation of Land at Finkley Down Farm (the 'Site').

4.2 The conclusions of this representation are as follows:

- Land at Finkley Down Farm ranks as the highest placed site when considering the Sustainability Appraisal Transport objectives;
- Both Land East of Ludgershall and Land South of the A342 were preferred options to Land at Finkley Down Farm within the Sustainability Appraisal, despite them scoring much lower on the Sustainability Appraisal Transport Objectives;
- The traffic impact of Land at Finkley Down Farm is unfairly considered as the additional impact to Land at Manor Down Farm;
- From a transport perspective, there appears to be no valid reason as to why Land at Finkley Down Farm has been omitted from Growth Option 2 in place of sites with lower levels of transport accessibility by sustainable and active travel modes. It is concluded that this results in a fundamental oversight in the fair and comprehensive assessment of the growth options;
- It is strongly recommended that the following variations of Growth Option 2 are tested:
  - Growth Option 2 but with Land at Finkley Down Farm (full development) in place of Land at Manor Farm; and
  - Growth Option 2 with Land at Finkley Down Farm (full development) but no Land south of A342 and east Shoddesden Lane, Ludgershall respectively.
- It is also recommended that Growth Option 1 is tested with full development at Finkley Down Farm (1,450 dwellings);
- Unlike the existing modelling, these tests should also take account of the reduced vehicle trip rates that will occur as result of the sustainable and active travel opportunities that Land at Finkley Down Farm provides.

- Without these additional options, Land at Finkley Down Farm has not been fairly assessed;
- Strategic Modelling suggests that with appropriate mitigation, the delivery of Land at Manor Farm and Land at Finkley Down Farm together is still a realistic option;
- Land at Finkley Down Farm provides the most potential of all sites to mitigate highway impact through the future uptake of sustainable and active travel modes through a '*Decide and Provide*' approach; and
- The housing appraisal recommended the site not be taken forward as an allocation and that the "*transport impacts in this area have potential to cause significant issues on the local highway network and Enham Arch*". We don't agree with this conclusion;
  - the traffic modelling doesn't support this;
  - the highly accessible nature of the site means that any impact can be mitigated through modal shift and the uptake of sustainable and active travel; and
  - a scheme of this size would provide funds towards highway improvements if found necessary

# Figures



Reproduced from .....

Key

1. Land East of Ludgershall

2. Land South of the A342

3. Land at Finkley Down Farm

20 Minute Walk Catchment

Land East of Ludgershall

Land South of the A342

Land at Finkley Down Farm

|     |      |         |          |            |             |
|-----|------|---------|----------|------------|-------------|
| Rev | Date | Details | Drawn by | Checked by | Approved by |
|     |      |         |          |            |             |

tpa

Transport Planning Associates

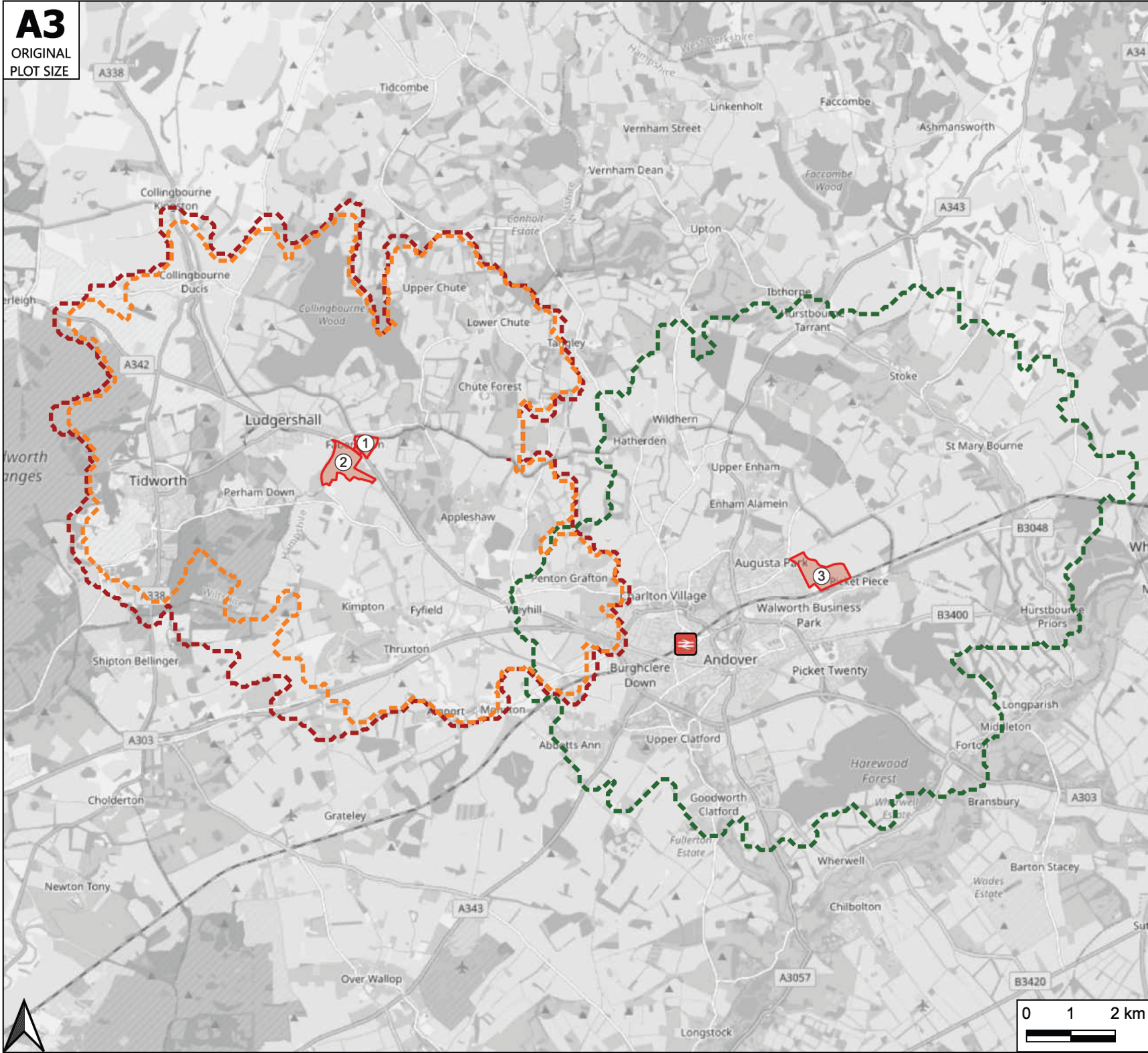
CLIENT:  
Taylor Wimpey Strategic Land

PROJECT:  
Finkley Down Farm, Andover

TITLE:  
Comparison of 20 Minute Walk Catchments

STATUS:  
FOR INFORMATION

|                     |          |                           |          |                |
|---------------------|----------|---------------------------|----------|----------------|
| SCALE:              | DATE:    | DRAWN:                    | CHECKED: | APPROVED:      |
| NTS                 | 13/03/24 | AC                        | SM       | JD             |
| JOB NO:<br>2403-003 |          | DRAWING NO:<br>Figure 2.1 |          | REVISION:<br>- |



Reproduced from .....

Key

1. Land East of Ludgershall

2. Land South of the A342

3. Land at Finkley Down Farm

30 Minute Cycle Catchment


Land East of Ludgershall

Land South of the A342

Land at Finkley Down Farm

Railway Station

| Rev | Date | Details | Drawn by | Checked by | Approved by |
|-----|------|---------|----------|------------|-------------|
|     |      |         |          |            |             |



Transport Planning Associates

CLIENT:  
Taylor Wimpey Strategic Land

PROJECT:  
Finkley Down Farm, Andover

TITLE:  
Comparison of 30 Minute Cycle Catchments

STATUS:  
FOR INFORMATION

|                     |                   |                           |                |                 |
|---------------------|-------------------|---------------------------|----------------|-----------------|
| SCALE:<br>NTS       | DATE:<br>13/03/24 | DRAWN:<br>AC              | CHECKED:<br>SM | APPROVED:<br>JD |
| JOB NO:<br>2403-003 |                   | DRAWING NO:<br>Figure 2.2 |                | REVISION:<br>-  |



## **APPENDIX 4**

### **Ecology Representations**

## Regulation 18 Consultation – Ecology Note

Finkley Down Farm, Andover – March 2024

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*This Ecology Technical Note has been prepared by CSA Environmental on behalf of Taylor Wimpey UK Limited in relation to land at Finkley Down Farm, Andover (hereafter referred to as 'the Site'), which is promoted for residential allocation as part of the emerging Test Valley Local Plan. It is intended to provide an overview of baseline ecological conditions at the Site, as well as ecological constraints and opportunities relevant to residential development.*

### 1.0 Introduction

- 1.1 The Site occupies an area of c. 77ha and is located around central grid reference SU 385 476, to the north-west of Andover, Test Valley. It consists of two arable fields bounded by hedgerows and fencing, and a grassland margin of varying width (see Habitats Plan in Appendix A).
- 1.2 This technical note has been informed by a preliminary habitat classification survey as part of an Update Ecological Appraisal, in addition to a desktop study for relevant habitat and / or strategic nature conservation designations, undertaken in 2018, the findings of which are summarised here-in. Although undertaken some six years ago at the time of writing, review of aerial imagery is sufficient to confirm that baseline habitat conditions have not altered significantly during the intervening period.
- 1.3 Test Valley Borough Council (TVBC) have published their draft Local Plan 2040 Regulation 18 Stage 2, with public consultation taking place between 6th February and 2nd April 2024. The draft Local Plan does not identify the Site as a potential housing allocation. This note will address concerns raised in respect of the Site within the Housing Site Appraisals appended to the Sustainability Appraisal of the Test Valley Local Plan 2040 (Interim SA Report, February 2024).

### 2.0 Planning Policy

#### Test Valley Borough Revised Local Plan DPD - 2011-2029 (2016)

- 2.1 The Revised Local Plan (DPD) was adopted by the Test Valley Borough Council on 27 January 2016 and forms the main part of the Development Plan for the Borough. The policies which are relevant to this note are the following:
  - Policy E5 Biodiversity

Development in the Borough that will conserve, and where possible restore and / or enhance, biodiversity will be permitted.

Development that is likely to result in a significant effect, either alone or in combination, on an international or European nature conservation designation, or a site proposed for such designation, will need to satisfy the requirements of the Habitat Regulations.

Development likely to result in the loss, deterioration or harm to habitats or species of importance to biodiversity or geological conservation interests, either directly or indirectly, will not be permitted unless:

- a) the need for, and benefits of, the development in the proposed location outweighs the adverse effect on the relevant biodiversity interest;
- b) it can be demonstrated that it could not reasonably be located on an alternative site that would result in less or no harm to the biodiversity interests; and
- c) measures can be provided (and secured through planning conditions or legal agreements), that would avoid, mitigate against or, as a last resort, compensate for the adverse effects likely to result from development.

The habitats and species of importance to biodiversity and sites of geological interest considered in relation to points a) to c) comprise:

- Sites of Special Scientific Interest (SSSIs);
- legally protected species;
- Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves (LNRs);
- priority habitats and species listed in the national and local Biodiversity Action Plans;
- habitats and species of principal importance for the conservation of biodiversity in England;
- trees, woodlands, ancient woodland (including semi-natural and replanted woodland), aged and veteran trees, and hedgerows; and
- features of the landscape that function as 'stepping stones' or form part of a wider network of sites by virtue of their coherent ecological structure or function or are of importance for the migration, dispersal and genetic exchange of wild species.

The level of protection and mitigation should be proportionate to the status of the habitat or species and its importance individually and as part of a wider network.

- **Policy E6 Green Infrastructure**

Development will be permitted provided that:

- a) it protects, conserves and where possible, enhances the Borough's Green Infrastructure network;
- b) it avoids the loss, fragmentation, severance or a negative impact on the function of the Green Infrastructure network;
- c) mitigation is provided where there would be an adverse impact on the Green Infrastructure network; and
- d) where it is necessary for development to take place on identified areas of Green Infrastructure an appropriate replacement is provided.

## Test Valley Borough Draft Local Plan 2040 Regulation 18, Stage 2

2.2 The Draft Local Plan 2040 has already undergone initial public consultation. Now the Regulation 18 Stage 2 document is undergoing consultation until Tuesday 2nd April 2024. The draft policies which are relevant to this note are the following:

- Policy BIO1: Conservation and Enhancement of Biodiversity and Geological Interest

*All development shall ensure the conservation, enhancement and restoration of biodiversity and geology, avoiding any adverse impacts on condition, and where relevant recovery, of all types of nature conservation sites, habitats, species and components of ecological networks or geological interests.*

*Development that is likely to result in the loss, deterioration or harm to habitats or species of importance to biodiversity or geological conservation interests, either directly or indirectly, will not be permitted unless:*

- a) The need for, and benefits of, the development in the proposed location outweighs the adverse effect on the relevant biodiversity or geological interest; and*
- b) It can be demonstrated that it could not reasonably be located on an alternative location that would result in no or less harm to the biodiversity or geological interest; and*
- c) Measures can be provided and secured (through planning conditions and / or legal agreements) that would avoid, mitigate against, or as a last resort, compensate for the adverse effects likely to result from development.*

*The habitats and species of importance to biodiversity and sites of geological interest considered in relation to criterion a) to c) comprise:*

- i. Sites of Special Scientific Interest (SSSIs);*
- ii. Legally protected species;*
- iii. Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs), and Road Verges of Ecological Importance (RVEI);*
- iv. Priority habitats and species listed in the national and local Biodiversity Action Plans;*
- v. Habitats and species of principal importance for the conservation of biodiversity in England;*
- vi. Irreplaceable habitats including ancient woodlands and ancient and veteran trees;*
- vii. Trees, woodlands and hedgerows; and*
- viii. Features of the landscape that function as stepping stones, form part of a Nature Recovery Network, areas identified in a Local Nature Recovery Strategy, form part of a wider ecological network and wildlife corridors by virtue of their coherent ecological structure or function or are of importance for the migration, dispersal and genetic exchange of wild species.*

*The level of protection and mitigation should be proportionate to the status of the feature of interest and its importance individually and as part of a wider network.*

- **Policy BIO2: International Nature Conservation Designations**  
*International designations have the highest level of protection of the nature conservation designations. Development that is likely to have a significant effect, either alone or in-combination, on an international nature conservation designation will be required to clearly demonstrate that any potential adverse effects on the integrity of such designations are fully mitigated. This includes the relevant in-combination effects for the below matters:*
  - a) *Nutrient neutrality within the relevant catchment areas for the River Avon SAC, River Itchen SAC and the Solent designations;*
  - b) *Recreational impacts on the New Forest designations, Solent designations and Salisbury Plain SPA;*
  - c) *Hydrology of Emer Bog SAC; and*
  - d) *Functionally-linked land impacts on Mottisfont Bats SAC and Solent and Southampton Water SPA.*

- **Policy BIO3: Biodiversity Net Gain**  
*Development for one or more dwelling or non-residential buildings will be permitted provided that it is designed to deliver at least a 10% measurable net gain of biodiversity habitat units using the appropriate BNG Metric. This will be secured and maintained for a minimum of 30 years.*

*In designing the development to achieve the measurable net gain, the following principles will need to be adhered to:*

- i. *Apply the mitigation hierarchy;*
- ii. *Avoid losing biodiversity that cannot be offset elsewhere, such as irreplaceable habitats;*
- iii. *Focus on achieving the best outcome for biodiversity; and*
- iv. *Where possible, maximise wider sustainability benefits.*

- **Policy BIO4: Green Infrastructure**  
*Development will conserve and enhance green and blue infrastructure. Planning permission will be granted where it can be demonstrated that:*
  - a) *the proposal incorporates either enhancements to existing green and blue infrastructure and/or the creation or restoration of provision.*
  - b) *the proposal can incorporate enhancements to existing woodland, street trees, landscape features and hedges, or the restoration and/or creation of landscape features, additional provision and networks. It may include the planting of trees.*

*Provision should be delivered on site. Where on-site provision is not possible or achievable, financial contributions may be required.*

#### **Policy BIO5: Trees and Hedgerows**

*Development will be permitted where the proposed development takes account of trees, both above and below ground, (including on site and off site trees) where;*

- a) *it provides for suitable new tree, woodland and hedgerow planting and future growth, where practicable;*
- b) *it avoids the loss or deterioration of irreplaceable habitats (such as ancient woodland, ancient semi-natural woodland, and ancient or veteran trees), unless there are wholly exceptional reasons;*

*c) impact on trees that are protected by a Tree Preservation Order is wholly necessary for demonstrable arboricultural reasons. Where consent is granted for removal, replacement tree planting will be required and secured to offset the loss;*

*d) it avoids the unnecessary loss of non-protected trees, hedgerows and woodland, particularly where they have high amenity value;*

*e) where it is demonstrated that any tree or hedgerow losses are unavoidable, the development provides for replacement and retention in a suitable location;*

*f) the proposal demonstrates that the maintenance, short and long term management, and potential future growth of retained trees, new trees and other planting can be provided for.*

*Relevant assessments will need to be undertaken in accordance with national standards.*

### **3.0 Baseline Conditions, Constraints & Opportunities**

#### Nature Conservation Designations

- 3.1 There are no statutory designations covering any part of the Site, and no international or national statutory designations have been identified within 10km and 3km of the Site respectively.
- 3.2 Notwithstanding the above, the Site (like all of Test Valley Borough) falls within the fluvial catchment of the Solent, whereby all new residential development is required to achieve nutrient neutrality in accordance with emerging policy BIO2, in order to avoid adverse effects upon the associated European site designations.
- 3.3 One local statutory designation was identified within 3km of the Site; Anton Lakes LNR (c. 1.3km west of the Site). This LNR comprises a mosaic of habitats following the site's previous use for gravel extraction. Waterbodies, chalk grassland and an area of wet, fen meadow are present. Based on the distance and poor habitat connectivity between the Site and the Anton Lakes LNR, and with consideration of its special interest features and their vulnerabilities, the presence of the LNR is not considered to represent a constraint to development at the Site.
- 3.4 A total of 28 non-statutory designations were identified within 2km of the Site, with two of these being present within 1km; Churchill Way, London Road Verges, Andover Site of Importance for Nature Conservation (SINC) (c. 0.9km south-west of the Site) and A3093 Churchill Way Road Verge of Ecological Importance (RVEI) (c. 0.8km south-west of the Site). Again, with consideration of their reasons for designation, neither of these sites are considered to represent a constraint to development.

#### Habitats

- 3.5 The Site comprises two large fields of cultivated cropland. Uncultivated field margins are present around the perimeter of both fields and vary from c. 1m to c. 2m in width. Species recorded within the field margins

were generally restricted to common and widespread ruderal species. Small incidental areas of neutral grassland are present within field corners, again with a strong influence of nutrient tolerant common ruderals.

- 3.6 Field boundaries are formed by hedgerows, which vary across the Site in their structure and species composition (some containing gaps, others intact, some outgrown with mature trees present and others clearly subject to routine flailing). Hedgerows to the north and west of the Site are generally more intact than the central hedgerow which runs north to south, bisecting the two fields. Hedgerows to the western boundary were among the more species-rich, bordering an off-site bridleway.
- 3.7 There is no mapped Ancient Semi-Natural or Plantation Woodland covering any part of the Site or adjacent land. No trees on or adjacent to Site are listed on the Ancient Tree Inventory.

#### Biodiversity Net Gain

- 3.8 In accordance with the statutory mandate for all new planning permission for major development, reflected in emerging policy BIO3, development at the Site would be required to secure a minimum 10% net gain in biodiversity.
- 3.9 Separate to the Update Ecological Appraisal, a Biodiversity Net Gain Feasibility Study has been undertaken for the Site by CSA Environmental on behalf of Taylor Wimpey UK Limited. This work was completed in August 2022. While the feasibility study represented a high-level appraisal based on limited layout and landscaping detail, it demonstrated that with inclusion of habitat creation within 'blue line' land under the same holding, the Site could be expected to deliver a net gain in biodiversity exceeding the 10% minimum requirement set by policy and legislation, both for spatial habitats and linear hedgerow features.

#### Fauna

- 3.10 The uniform distribution of habitats of low ecological value at the Site is such that opportunities for protected and priority species are limited.
- 3.11 Hedgerows and mature trees at the Site have the potential to support roosting and foraging/dispersing bats. At the application stage, it will be appropriate that activity surveys comprising walked transects and static monitoring are undertaken to gather evidence on the baseline diversity, distribution and abundance of bat species, to inform an ecological impact assessment. Development proposals would in any event seek to retain existing trees, and given their limited number and distribution it is anticipated that this will be achievable.
- 3.12 Boundary vegetation at the Site is also suitable to support dormice, which are known to be present in the area and have historically (c. 20

years ago) been recorded on-site. Again, it will be important for development proposals to be informed by detailed survey work at the application stage. However, with the exception of discrete gaps for access infrastructure, it is clear that the Site is of a size whereby strategic green infrastructure could be incorporated within masterplanning to retain key dispersal opportunities, and ensure no loss of dormouse habitat availability or connectivity.

- 3.13 No evidence of badgers or setts have been previously identified during visits to the Site by CSA, however the habitats on-site and railway embankment adjacent to the south provide suitable foraging and sett building opportunities. The habitats on-site also have the potential to support breeding birds, including some farmland specialists, and there are some limited opportunities for common reptile species. Dedicated surveys will again be appropriate at the application stage. In view of the lack of local records and potential aquatic breeding habitats identified in the local area, great crested newts are considered unlikely to occur at the Site.

#### **4.0 Matters Raised at Housing Site Appraisal**

- 4.1 The Sustainability Appraisal of the Test Valley Local Plan 2040 (Interim SA Report, February 2024) includes at Annex IV the Housing Site Appraisals. This sets out individual appraisals for housing sites submitted through the SHELAA and Local Plan 2040 consultation stages that reached Stage 5 (detailed assessment) of the site selection process.
- 4.2 Within the Housing Site Appraisals, assessment criteria are grouped into plan objectives, with that relevant to this technical note being Objective 10; to conserve and, where possible, enhance biodiversity and habitat connectivity.
- 4.3 In respect of Land at Finkley Down Farm, Andover (SHELAA ref 165), 'strongly positive' scoring is attributed to the Site's ability to conserve habitats and species, achieve net gains for biodiversity and enhance the local ecological network. It is acknowledged features of ecological value could be retained, buffered and enhanced alongside development. 'Positive' scoring is assigned to the Site's ability to conserve and enhance green infrastructure provision. However, 'negative' scoring is assigned in respect of two criteria.
- 4.4 Firstly, 'negative' scoring is assigned to the Site's ability to conserve and enhance protected sites in line with relevant legislation and national policy. This is justified as follows:

*"Areas of ancient woodland are located to the north east of the site at Ridges Copse and Hackwood Copse. Consideration will need to be given to indirect cumulative impact on ancient woodland."*

*There is also a cluster of Sites of Importance for Nature Conservation (SINC) located to the north of the site where indirect cumulative impact will need to be considered.*

*The site is within the Solent nitrates catchment area where mitigation is required."*

- 4.5 The second criterion attracting 'negative' scoring relates to whether development at the Site would affect protected and unprotected trees, which is justified as follows:
- 4.6 *"There are some TPO trees located along the south western corner of the site adjacent to Finkley Down Farm. Confirmation is required regarding retaining these trees in the indicative masterplanning.*
- 4.7 *There are unprotected trees located around the site boundary with greater tree cover along the southern boundary adjacent to the railway. There are also some unprotected trees along the hedgerow boundary through the centre of the site. A tree survey will be required to determine the impact on trees."*
- 4.8 Comment is provided below on the above matters attracting 'negative' scoring.

#### Ancient Woodland

- 4.9 The Housing Site Appraisal correctly identifies that mapped parcels of Ancient Woodland are present within the surrounding landscape. Indeed, such parcels are present on all aspects of Andover. The closest of these to the Site are Trinley Wood and Hackwood Copse, some 1.3km to the north-east.
- 4.10 Self-evidently, residential development at the Site could have no direct impact upon the off-site parcels of Ancient Woodland. However, implicit within the Site Appraisal wording is a perceived risk of development at the Site contributing toward indirect, cumulative impacts. It is not stated what other impact sources the cumulative risk concerns, nor the specific cumulative impact pathways which are considered to present this risk. Typical impact pathways relevant in this context include increased recreational pressure brought about by the increased local population, or habitat degradation linked to air quality impacts associated with increased vehicular traffic.
- 4.11 In respect of the latter, such impacts are unlikely to occur, because the woodland parcels are not located within 200m of any road likely to experience increased traffic volumes sufficient to appreciably affect vehicle-derived atmospheric nitrogen or nitrogen deposition as a result of development of the Site.

- 4.12 In respect of recreational pressure, OS mapping shows no public right of way, parking opportunities, or direct pedestrian connectivity linking the Site and the above Ancient Woodlands. It can therefore be concluded that development at the Site could not materially contribute to recreational pressures, so far as there are any, at these parcels.
- 4.13 A further parcel of Ancient Woodland, Ridges Copse (c. 1.4km north of the Site) does by contrast feature public rights of way. As with the above parcels though, no parking opportunities are apparent on OS mapping, and there is no direct pedestrian connectivity linking to the Site.
- 4.14 In this respect, there is a noteworthy inconsistency in the treatment of the Site within the Housing Site Appraisals with that for Land at Manor Farm, Andover (SHELAA 173); a 154ha site with a reported capacity of 800 homes, immediately south of Bilgrove Copse Ancient Woodland. The Housing Site Appraisal remarks upon the fact that the Ancient Woodland is retained under illustrative masterplanning for the Manor Farm site, with *"provision of country park and open space to maintain appropriate buffer distances."* It is not appraised whether this layout might in fact draw recreational pressure toward the Ancient Woodland, nor are any concerns cited over potential cumulative impacts. In contrast to the Site, the draft Local Plan identifies Land at Manor Farm as a strategic allocation.

#### Sites of Importance for Nature Conservation

- 4.15 Each of the SINCs to the north of the Site concern parcels of Ancient Woodland, and as such the above commentary applies equally in this regard. The Bilgrove Copse Ancient Woodland described above in connection with Land at Manor Farm (SHELAA 173) is one such SINC.

#### Nutrient Neutrality

- 4.16 As discussed above, the requirement to deliver nutrient neutrality is universal to proposals for any net increase in housing within Test Valley Borough, and there are no site-specific factors limiting the ability for development in the location of the Site to achieve neutrality. To the contrary, as cultivated cropland likely to be subject to agrochemical inputs, the baseline surface water nutrient nitrogen export from the Site will be high. This makes nutrient neutrality easier to achieve relative to sites where the baseline nutrient export is comparatively low, such as grazed pasture or brownfield development.
- 4.17 It is noteworthy that the Housing Site Appraisals have, again, not applied this criterion consistently. No negative scoring ascribed to nutrient neutrality requirements has been applied to Land at Manor Farm, Andover (SHELAA 173).

### Trees

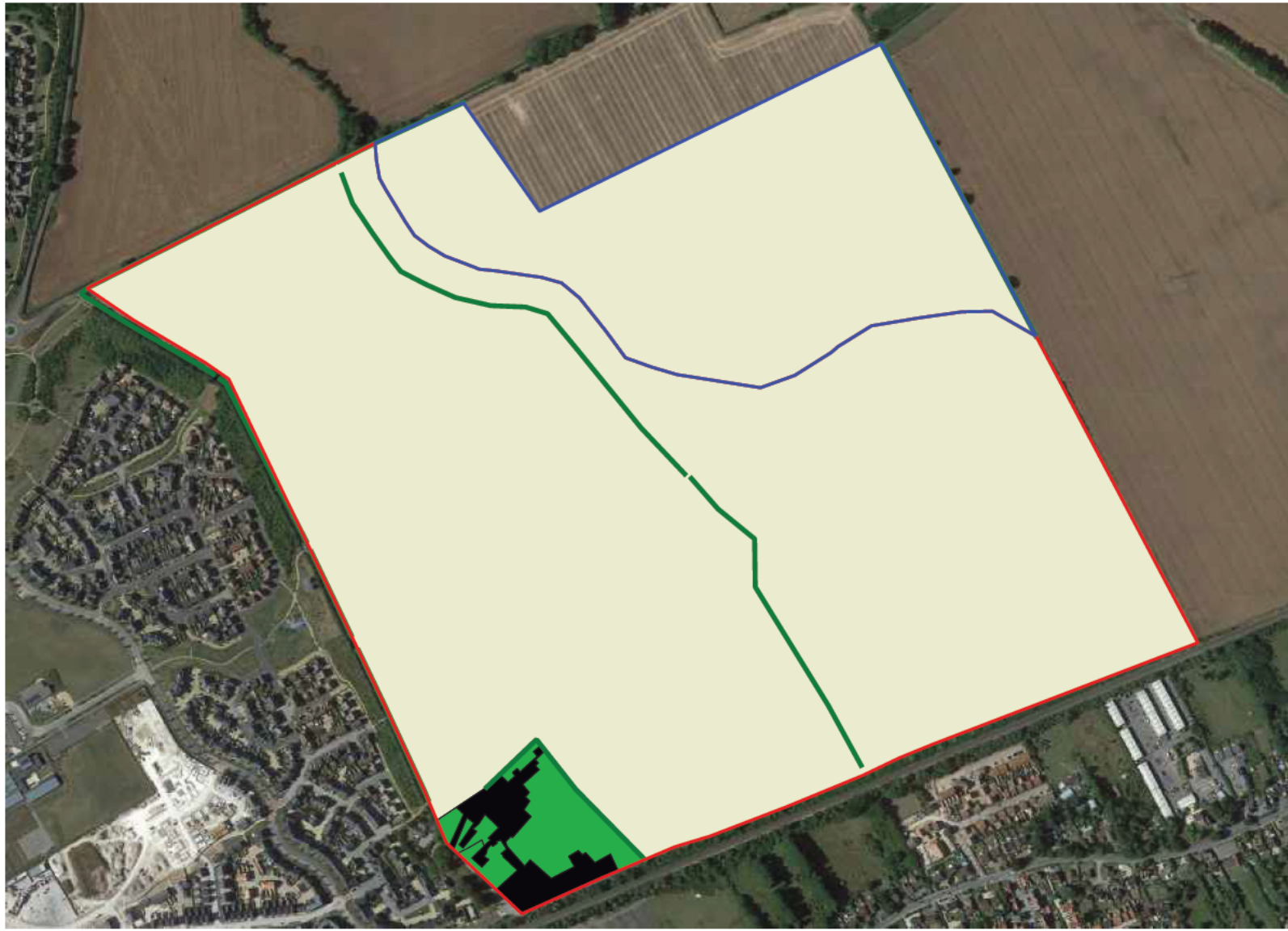
- 4.18 In relation to the Site, the Housing Site Appraisal correctly identifies that occasional trees are present, including some subject to TPO, however all trees are restricted to field boundary hedgerows. No trees are present in the north-west corner of the Site where primary access is envisaged off Finkley Road, and the trees subject to TPO are off-site to the south-west with no realistic prospect of direct impacts.
- 4.19 It is therefore unclear why negative scoring has been assigned under the Housing Site Appraisal. Illustrative masterplanning for the Site makes provision for a substantial increase in tree cover over the baseline situation.
- 4.20 Once again, there is an inconsistency in the treatment of the Site with that of Land at Manor Farm, Andover (SHELAA 173). Here, the Housing Site Appraisal assigns 'mixed performance' scoring, with commentary stating *"There are no Tree Preservation Orders affecting the site, however there are existing trees on field boundaries within the site which may need to be retained as part of any future development."* This commentary could equally apply to the Site.


## **5.0 Conclusion**

- 5.1 The Site contains habitats of limited ecological interest, with those of greatest value associated with the native hedgerows and mature trees at field boundaries. While detailed proposals for ecological impact avoidance and mitigation will necessarily be advanced at a later stage of planning, informed by detailed further baseline surveys and assessments, it is anticipated that any potential negative effects on protected or priority species could be readily addressed through habitat creation within strategic green infrastructure corridors.
- 5.2 Critical appraisal set out here-in of the negative scoring assigned to the Site within the Housing Site Appraisal suggests that concerns are misplaced. The presence of parcels of Ancient Woodland and Sites of Importance for Nature Conservation within the surrounding landscape are not considered to represent a constraint to the principle of development at the Site, and there is no significant risk of development impacting the off-site TPO trees. In these regards, the Housing Site Appraisals have not applied criteria consistently across site promotions.
- 5.3 The remaining constraints, such as the need to deliver nutrient neutrality and secure a net gain in biodiversity, are ubiquitous requirements to all strategic allocations. No overriding constraints have been identified to suggest that development at the Site could not be achieved in a manner consistent with emerging policies BIO1-5.

## **Appendix A**

Habitats Plan



-  Site boundary
-  Additional landholding
-  Cropland
-  Modified grassland
-  Developed land
-  Hedgerow

0 90 180 270 360 450metres



**Project** Finkley Down Farm, Andover

**Date** May 2022

**Drawing No.** CSA/1845/124

**Drawing Title** Baseline Habitats Plan

**Scale** Refer to scale

**Rev** -

**Client** Taylor Wimpey UK Limited

**Drawn** SV

**Checked** MR