

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

COMMENTS FORM

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

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

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

Part A: Your Details

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

Further information can be found on our website at:

www.testvalley.gov.uk/localplan2040

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

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

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

Contacting us

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

Tel: 01264 368000

Website: www.testvalley.gov.uk/localplan2040

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	MR	First Name*	ROBERT
Surname*	COLLETT		
Organisation* (If responding on behalf of an organisation)	LUKEN BECK MDP LTD		

Please provide your email address below:

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

Address*			
		Postcode	

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

PERSIMMON HOMES

Personal Details and General Data Protection Regulation

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

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

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

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

Part B: Your Comments

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

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

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

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

General

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
POLICY SS1	PLEASE SEE ATTACHED LETTER DATED 28th MARCH 2024 FOR COMMENTS
POLICY SS6	
POLICY NA4	
POLICY NA5	
POLICY NA6	
POLICY NA7	
POLICY NA8	

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.

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

28th March 2024

Our Ref: RC/23064
Your Ref:

By email only: planningpolicy@testvalley.gov.uk

Dear Sir

Representations to the Test Valley Draft Local Plan 2040 Regulation 18 – Stage 2 Consultation

I write on behalf of my client, Persimmon Homes, to submit representations to the Test Valley Draft Local Plan 2040 Regulation 18 – Stage 2 consultation document and associated evidence.

These representations seek to object to the overall spatial strategy for the delivery of housing in northern Test Valley in principally allocating large sites to deliver housing, too much reliance being placed on housing delivery at Ludgershall as a less sustainable settlement, the policy failing to adequately assess development constraints to propose sufficient housing land to meet the Borough's needs, the failure to demonstrate a consistent supply over the plan period and the lack of a consistent and equitable site assessment process in the Sustainability Appraisal to consider the suitability of sites. In this regard, we consider the draft plan is at risk of being found unsound under the relevant tests, as set out at Paragraph 35 of the NPPF (December 2023):

- "a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."*

In order to help improve the soundness of the draft plan, in particular through boosting the supply of housing both in terms of numbers and phasing to address current deficiencies in the draft plan we strongly encourage the Council to review the spatial strategy and site selection process and include the land east of The Middleway, Picket Twenty site as a draft allocation as this is a highly sustainable location, has been assessed in the SHELAA as an achievable site that has no significant development constraints and is owned by a developer, to confirm it is an available, achievable and deliverable site.

Objection – Spatial Strategy Policy 1 (SS1): Settlement Hierarchy

The overarching aims of Policy SS1 are supported, which sets out the ‘presumption in favour of sustainable development’, in accordance with the aims of the NPPF. Furthermore, the recognition of Andover as a ‘Tier 1’ settlement, as the most sustainable settlement in northern Test Valley is also supported, appreciating its range of employment, facilities, services and public transport to support the residents of the town and wider area and as a focus for strategic growth in the north of the Borough.

It is considered however that there is a significant deficiency in Policy SS1, in that development at Ludgershall forms a major part of the Council’s housing delivery strategy in northern Test Valley (Policy SS6), yet there is no reference in Policy SS1 or its supporting text to Ludgershall or any attempt to reference its relative sustainability in the settlement hierarchy or confirm its suitability for the strategic growth of this Borough as a sustainable location for development. It is acknowledged that Ludgershall is located in the neighbouring local authority area of Wiltshire Council, however in seeking to implement the presumption in favour of sustainable development set out at Policy SS1 and justifying the housing strategy at Policy SS6 then there should be an appreciation in the Test Valley Local Plan of the sustainability of Ludgershall relative to other settlements in Test Valley Borough, to confirm the approach. If not through detailed assessment, at least through cross-reference to Wiltshire Council’s Settlement Strategy set out at Policy 1 of the Wiltshire Local Plan – Pre-submission Draft 2020-2038 (Regulation 19), where Ludgershall is recognised as a ‘market town’ and accepting that it is not a highest order settlement.

It is acknowledged that reference is made at Paragraph 5.113 of the Sustainability Appraisal (February 2024) to Ludgershall being designated as a ‘Tier 2’ market town settlement in Wiltshire in the adopted Wiltshire Local Plan (2015) and that whilst the northern Test Valley HMA is ‘aligned to the Borough boundary’, there is a relationship with the adjacent Wiltshire HMA and consequently it is reasonable to consider potential strategic allocation adjacent to the settlement boundary in Test Valley, that contributes to the Borough’s need, consistent with the HMA evidence and the emerging Wiltshire Local Plan. Furthermore, the Test Valley Strategic Housing Market Assessment (January 2022) sets out at Paragraph 1.31 that the ‘north of the Borough, particularly around Andover is influenced by Salisbury and other Wiltshire settlements’.

It is considered that at present due to the lack of consideration/reference to Ludgershall in the settlement hierarchy at Policy SS1 that this is a significant omission and consequently this policy and the whole spatial strategy for northern Test Valley has not been appropriately justified and is unsound, being inconsistent with the tests set out at Paragraph 35 of the NPPF. This is because the overall strategy of the plan to identify Ludgershall for strategic expansion has not been appropriately or sufficiently referenced, considered or assessed as part of this Plan to confirm it as a suitable and sustainable location for strategic growth. Furthermore, from references in the sustainability appraisal/SHMA, the Council may be heavily relying on meeting development needs of the wider Wiltshire HMA rather than concentrating on and meeting the specific development needs of Test Valley Borough.

Objection – Policy 6 (SS6): Meeting the Housing Requirement

Overall Strategy in Northern Test Valley

The Council has sought to outline an overall housing strategy for the northern housing market area that principally relies on the delivery of very large strategic allocations (other than the proposed allocation south of London Road, East Andover), rather than to propose a range of housing allocations in terms of sizes to ensure a continuity of housing supply over the plan period, including in the first five years. The plan proposes the following sites:

- Land South of London Road, East Andover – 90 dwellings
- Land at Manor Farm, North of Saxon Way, North Andover – 800 dwellings

- Land at Bere Hill, South East Andover – 1,400 dwellings
- Land East of Ludgershall – 350 dwellings
- Land South East of Ludgershall – 1,150 dwellings

The Plan therefore relies on sites of 350 dwellings or more to deliver more than 97% of dwellings in the housing allocations and sites of 800 dwellings or more to deliver over 88% of dwellings in the housing allocations.

It is well established through experience of delivery in this Borough and elsewhere that there are significant time delays involved in delivering large strategic sites and securing residential occupations to help meet local housing needs (including affordable housing need). These delays are caused initially through planning timescales – for example community consultation, masterplanning, pre-application discussions, outline planning application, reserved matters consent and the discharge of planning conditions. These timescales are often further exacerbated through discussions/negotiations required between landowners and developers to acquire sites and enable a start on site with often significant levels of up-front infrastructure required on large sites before housing development can commence.

The likely delays caused through an over-reliance on large strategic sites is demonstrated by reference to the SHELAA that whilst the smallest allocation, south of London Road, Picket Twenty and which is principally developer controlled, is identified to deliver housing in the 1-5 year period, the larger sites such as Manor Farm and the sites at Ludgershall are referenced to principally deliver housing in the latter part of the plan period and whilst the Bere Hill site is suggested as possibly delivering housing in the short term, it is not controlled by a developer and is constrained in terms of its access. Consequently the likelihood of delivering housing in the short term has to be questioned. It is also interesting to note that the reference is made in the SHELAA to the east of Ludgershall and south east of Ludgershall sites being promoted by the landowner, with 'interest' from a promoter and consequently they do not appear to be under developer control to provide certainty over delivery.

It is considered that a strategy that relies on large strategic sites is likely to result in delays to housing delivery and a 'back loading' of delivery into the latter stages of the plan period. Furthermore, such a strategy only requires a delay/non-delivery to one site to cause significant issues with the Plan's overall strategy to meet housing needs and maintain a deliverable housing supply. At present it is considered that this Policy is unsound as it is not sufficiently justified to meet the tests set out in the NPPF, due to its over reliance on large housing sites that can affect the maintaining of a continuous housing supply throughout the plan period in the most sustainable locations. Furthermore, although we support the inclusion of a buffer in the total housing supply identified at Table 3.3, to provide flexibility, it is not considered that the level of buffer identified actually exists and housing supply should be increased. It is considered that additional and smaller housing sites such as the land east of The Middleway, Picket Twenty should be added to the strategy to bolster, provide greater flexibility and help maintain a supply of deliverable housing sites, especially in the shorter term, while the larger allocations are coming forward.

Locational Strategy in Northern Test Valley

As outlined above in relation to Policy SS1, the locational strategy for housing delivery in northern Test Valley includes the delivery of two sites adjacent to Ludgershall as an extension to this settlement within Wiltshire. The relative sustainability of Ludgershall has not been considered or determined in the settlement hierarchy to confirm its suitability as a sustainable location for development in the Borough. Notwithstanding the apparent lack of any robust assessment by Test Valley Borough Council in this respect, Wiltshire Council's own assessment has confirmed this as a 'market town' and not a highest order or most sustainable settlement. Test Valley Borough Council is however relying on two sites within the Borough adjacent to Ludgershall to deliver almost 40% of the

housing allocated in northern Test Valley (1,500 dwellings). This is considered to be unsound as it fails to be consistent with national policy set out in the NPPF to direct development to the most sustainable locations.

It is considered that there is a disproportionate reliance placed on housing delivery at Ludgershall for a significant quantum of development, as a likely less sustainable settlement than Andover and which is likely to meet the wider needs of Wiltshire rather than Test Valley. This is further exacerbated when allocations within Wiltshire Council's emerging plan are considered, resulting in 2,720 dwellings at this settlement overall and is likely to require coordination with delivery of the site in Wiltshire to provide a coherent development. It is considered that greater reliance should be placed on sites at Andover to deliver an increased quantum of development as the most sustainable settlement in the Borough to deliver a suitable development strategy, with a reduced reliance on apparent lower order and less sustainable locations.

Objection - Northern Area Policy 4 (NA4): Land South of London Road, Picket Twenty

We support the principle of allocating land south of London Road, Picket Twenty for residential development, seeking to reallocate the remainder of land included within Policy COM6A of the Revised Local Plan that has yet to come forward for development. We however object to this policy as it fails to allocate a sufficient level of development to make best and most efficient use of this site and proposes a significant area of open space which is unjustified and unnecessary in this location.

The site is situated to the east of Andover, which is the most sustainable settlement in the Borough and is well located in terms of access by sustainable modes of travel to facilities and services in Picket Twenty and public transport to Andover town centre. This promotes the presumption in favour of sustainable development set out at Policy SS1, in accordance with the NPPF and as such is a sound basis for a housing allocation.

The site has been promoted for development in the SHELAA and confirmed by the Council as suitable and available for development without any significant constraint for around 160 dwellings (references 258 & 441). The only constraint identified is its location outside the settlement boundary, which is addressed by its allocation for development. It is also important to note that the SHELAA has recognised that the site could deliver housing in the 1-5 year period, as such contributing to the housing supply early in the plan period. Furthermore, the site allocation is principally controlled by Persimmon Homes and as such represents a deliverable form of development.

As a highly sustainable location, where development has been identified as achievable in the SHELAA and is deliverable through its control by a developer, it is not considered that the draft allocation for 'approximately 90 dwellings' sufficiently recognises the important contribution that this site could make to the housing land supply. In order to make the best use of this land it is considered that at the very least Policy NA4 should be amended to reference a 'minimum of 90 dwellings' to be consistent with the 'minimum' wording in the Borough's housing requirement at Policy SS3 but preferably a 'minimum of 160 dwellings' to reflect the capacity set out in the SHELAA.

It is noted that Figure 4.4 suggests that the eastern part of the draft allocation should be delivered as green space. It is considered however that such provision is unnecessary due to the significant levels of over provision of open space within Picket Twenty and that green space in this location would perform no function of significant value, as an extension to the Harewood Common green space is not necessary and furthermore the northern extent of the Harewood Common green space could offer additional residential development capacity (shown on the development concept plan in the enclosed vision document). It is important to note that the eastern extent of the allocation does not represent the edge of Picket Twenty, with this marked by the woodland at Houndshott Copse to the east and the eastern side of The Middleway site (as acknowledged at Paragraph 1.1.109 of the Council's Landscape Sensitivity Study). It is considered therefore that reference to green space on Figure 4.4 should be

removed. This change would further recognise the importance of this site to deliver sustainable development in the short term.

Objection - Northern Area Policy 5 (NA5): Land at Manor Farm, North Andover

It is considered that this location for a large strategic allocation is inappropriate, as it represents a significant and largely uncontrolled incursion into the open countryside that is beyond the defensible northern boundary of Andover, marked by Saxon Way. Furthermore, the site is in close proximity to the North Wessex Downs National Landscape and puts potential pressure on the gap between Andover and Enham Alamein (recognised in the scoring at Objective 8(c) of the Sustainability Appraisal).

It is noted that Policy NA5 references the need for a provision of a significant area of high quality and accessible green space in the north, a heritage impact assessment, a buffer to the east adjacent to Knights Enham, a buffer to the west to the crematorium and a sequential approach to direct development to areas of lowest flood risk. It is clear therefore that there are significant constraints to development on this site which significantly reduces the extent of the developable area and question the suitability of the site for development.

It is considered that the draft Policy and accompanying sustainability appraisal has failed to appreciate the sensitivity of the landscape and potential harm to the open and largely undefined countryside location and the setting of the North Wessex Downs National Landscape. Although Objective 8(a) of the Sustainability Appraisal has referenced the presence of the National Landscape, it is not considered that this has appropriately assessed the potential landscape impact of development on the countryside or this important designation of national significance, where the NPPF and local plan policies make it clear that harm should be avoided (including harm to its setting). This is especially as the 'Test Valley Landscape Sensitivity Study' (January 2024) has recognised this as a 'landscape of high overall landscape sensitivity to change', with a slight reduction in sensitivity to the south, to the west of Saxon Way (paragraph 1.1.17). In this context, it is considered that the Council has failed to appropriately justify that this site is a suitable location for strategic growth and that it can appropriately accommodate the level of development proposed without significant landscape harm. Furthermore it is considered that the 'mixed performance' scoring in the Sustainability Appraisal is incorrect and this should be re-scored based on the findings of the Landscape Sensitivity Study as either 'negative' or 'strong negative', to fully acknowledge this site's location, context and level of sensitivity.

It is also considered that the 'mixed performance' scoring under Objective 8(b) is unreliable and fails to acknowledge the location of the site outside of the settlement policy boundary and beyond the current defined extent of Andover provided by Saxon Way and this Objective should be rescored to 'negative'.

It is noted that the sustainability appraisal has also failed to equitably assess sites in terms of conserving and where possible enhance biodiversity and habitat connectivity (objective 10). It is noted that this site is scored 'negative' under Objective 10(a), in recognition of the site's proximity to ancient woodland and SINC, but has failed to reference the site's location within the Solent Nitrates mitigation catchment area where mitigation is required, whereas the land east of The Middleway site is scored 'strong negative' based on the same constraints and where mitigation can be provided in accordance with Natural England and Forestry Commission guidance. Another area where there is a lack of parity in site assessments for Objective 10(d) where similar constraints are referenced and the Manor Farm site is scored 'mixed performance' and the east of The Middleway site scored 'negative'.

It is considered therefore that the Council has inequitably scored sites within the Sustainability Appraisal to accurately or fairly identify the Manor Farms site as a suitable strategic allocation. In the event however that this

site is maintained as an allocation, it is considered that the quantum of any development should be reduced in recognition of the site's constraints.

Objection - Northern Area Policy 6 (NA6): Land at Bere Hill, South Andover

It is considered that this site represents a generally logical and appropriate location for the sustainable growth of Andover, which is appropriately defined by the A303 and A3093 to contain development and avoid uncontrolled sprawl. It is noted however that the site has several key constraints – including noise impacts from traffic, access constraints and potential ecological and heritage impacts on Ladies Walk. It is noted that buffers have been indicatively shown on Figure 4.6, however it does not appear that appropriate and relevant robust assessment work has been undertaken to confirm whether these are sufficient to address potential impacts and consequently whether the site can deliver the anticipated level of development. Furthermore, whilst it is noted and appreciated the reasoning behind a suggested landscaped buffer to the north of the allocation, adjacent to Ladies Walk, this is unfortunate and may constrain the ability for the site to successfully assimilate with the wider Andover area and will require careful and sensitive design to create an effective integration of existing and new communities.

It is unfortunate that the Sustainability Appraisal fails to assess the draft allocation as a whole and instead compartmentalises the site into three separate entries based on SHELAA references and as such it fails to comprehensively assess or consider it as a single assessment, making detailed site understanding and justification difficult. It is considered that the comprehensive assessment should be amended and included as a single entry for the site as a whole.

Objection - Northern Area Policy 7 (NA7): Land to the East of Ludgershall

The objections set out above in relation to identifying Ludgershall for major housing development and the lack of reference in the settlement hierarchy to confirm this as a suitable location to accommodate the level of growth proposed remains. Notwithstanding this, we also have serious concerns regarding the suitability of this site to accommodate housing development due to the significant development constraints that are identified – the 'close proximity' of the National Landscape and the need to create a 'positive contribution to its setting' (paragraph 4.89), the proximity to the Salisbury Plain SPA and the need for appropriate mitigation (paragraph 4.91), the lack of a confirmed suitable access (paragraph 4.92), potential for traffic noise (paragraph 4.93) and the need for an odour assessment (paragraph 4.94) in addition to the need for a sequential approach to flood risk (paragraph 4.95). These all represent significant development constraints in their own right and when combined significantly constrain development potential and the area of developable land available. It does not appear that relevant and robust assessments have been undertaken to consider development potential and furthermore no attempt has been made on Figure 4.8 to identify any buffer zones or mitigation areas to address potential impacts, as shown in Figures accompanying other draft allocations. Consequently, there is no certainty that the site could deliver the level of development proposed.

It is considered that the Council's site assessment set out in the Sustainability Appraisal fails to appropriately assess the site and consider its constraints to justify this as a suitable location for development. For example, Objective 8(a) in relation to landscape character/protected landscapes is scored as 'negative' and whilst it has referenced the site's location adjacent to the North Wessex Downs National Landscape and despite potential close relationship with nearby urbanising effects, it is set out that the relationship with the National Landscape elevates the sensitivity and this will need to be addressed through later design/landscape strategy. Given the importance of protecting National Landscapes and their setting from harm afforded in the NPPF, the lack of robust mitigation and the recognition of this landscape having a 'moderate-high landscape sensitivity to change' in the Test Valley Landscape Sensitivity Study (January 2024, Paragraph 1.1.342), it is not considered that this Objective has been scored correctly and it should be re-scored as 'strongly negative'. It is also not considered that Objective 8(b) has been appropriately

scored, as whilst the site is located adjacent to development to the west, it represents a general linear style form of extension to the settlement, which isn't considered to be 'positive' as scored and should be re-scored as 'mixed performance' at best or more likely 'negative'.

It is also noted that Objective 2(b) in relation to accessibility to strategic employment sites by sustainable modes of transport is scored as 'positive' due to its proximity to a bus stop, however the employment area falls significantly outside of the 5km zone. It is considered that this objective is misleading as proximity to strategic employment sites and accessibility by sustainable modes of transport are separate and potentially conflicting assessment criteria. It is considered inappropriate for this site to score as 'positive' solely due to its proximity to a bus stop when it is relatively isolated from strategic employment sites, especially as accessibility by sustainable modes of travel are considered separately elsewhere under Objective 3(h). This objective should be amended to solely relate to proximity to strategic employment sites, which is considered to be a fairer expression of a relative sustainability of a site and where a score of 'negative' or 'strong negative' should be recorded. The apparent lack of equity in this objective is apparent when compared with the same scoring for the east of The Middleway site, where a 'positive' score is similarly identified but this site falls within the 5km of a strategic employment site criterion.

In relation to conservation and the historic environment, it is noted that the site scores as 'positive' for Objective 9(b) due to the proximity to the Scheduled Monument, however it is considered that this should be re-scored as 'no effect'. Furthermore, Objective 12(c) in terms of retention/enhancement of PRoW is scored as 'positive', when off-site linkages are required and consequently delivery cannot be confirmed, as such it is considered that this would be more accurately marked as 'mixed performance'.

In conclusion it is considered that there are serious uncertainties about the suitability of Ludgershall to accommodate future housing growth due to it being a lower order and less sustainable settlement. Furthermore, there are significant issues associated with the soundness of this site in terms of suitability to deliver the level of development proposed due to the combination of significant constraints, in particular the potential for landscape harm to the National Landscape and provides a lack of justification for this site allocation.

Objection - Northern Area Policy 8 (NA8): Land to the South East of Ludgershall

Consistent with comments in relation to Policy NA7, the objections set out above relating to the identification of Ludgershall for major housing development and the lack of reference in the settlement hierarchy to confirm this as a suitable location to accommodate the level of growth proposed remain. Notwithstanding this, we also have serious concerns regarding the suitability of this site to accommodate housing development as Policy NA8 sets out significant constraints to development that could potentially affect the principle of development on this site and consequently question its achievability as a site.

The points of development principle include a need to integrate with existing and proposed development in Wiltshire (paragraph 4.98) and consequently a need to coordinate with forthcoming development within the neighbouring local authority area that could affect overall deliverability. Furthermore, a bridge over the railway used by Ministry of Defence is required for access, which is described as a 'significant piece of infrastructure' requiring further discussions between Hampshire County Council, Wiltshire Council and Network Rail (paragraph 4.103) – consequently until appropriate agreements are reached in principle with the relevant parties for this bridge then it cannot be confirmed that suitable access can be achieved to allow the site to come forward for development.

In addition to 'in principle' constraints, there are also references to proximity to the North Wessex Downs National Landscape (paragraph 4.99), adjacent ancient woodland (paragraph 4.100), proximity to the Salisbury Plain SPA (paragraph 4.101), the need for an odour assessment (paragraph 4.102), possible railway noise/vibration (paragraph

4.105), potential for contamination (paragraph 4.106) and the need for a sequential approach to flood risk (paragraph 4.107). Similarly, to the above, these all represent significant development constraints in their own right and when combined significantly constrain development potential and the area of developable land available. It also does not appear that relevant and robust assessments have been undertaken to consider development potential and furthermore no attempt has been made on Figure 4.9 to identify any buffer zones or mitigation areas to address potential impacts, as shown in Figures accompanying other draft allocations. Consequently, there is no certainty that the site could deliver the level of development proposed.

In assessing the site, it is noted that the Sustainability Appraisal has scored the site as 'mixed performance' in relation to Objective 8(a) regarding development affecting landscape character and protected landscapes. There is however no reference in the commentary to the proximity to the North Wessex Downs National Landscape that is reflected at paragraph 4.99 of the draft Local Plan. It does not appear therefore that appropriate regard has been had to this protected landscape of national importance, the criteria set out in the NPPF and the potential for harm to this area. Consequently, it is considered that this would be more accurately scored as 'negative' at the least or possibly 'strongly negative'.

It is not considered that Objective 8(b) has been appropriately scored for this site, where a 'mixed performance' scoring has been applied but the commentary states that only a small part of the northern area could be contained but the remainder of the site could lead to urban sprawl into the countryside. As such it is considered that this Objective would be more accurately marked as 'negative' or 'strongly negative'.

In relation to conservation and the historic environment, it is noted that the site scores as 'positive' for Objective 9(b) due to the proximity to the Scheduled Monument, however it is considered that this should be re-scored as 'no effect'.

In conclusion it is considered that there are serious uncertainties about the deliverability of this site based on a need for a coordinated approach for development in the neighbouring local authority area and requirement for bridge access over the railway. Furthermore, there are significant issues associated with the soundness of this site in terms of suitability to deliver the level of development proposed due to the combination of significant constraints, in particular the potential for landscape harm to the National Landscape and potential for uncontrolled sprawl into the countryside.

Vision and Rationale for the Development of Land East of The Middleway, Picket Twenty

The land east of The Middleway, Picket Twenty site is located to the east of Andover, which is acknowledged as the principal and most sustainable settlement in northern Test Valley and where strategic growth is promoted in the Council in the draft Local Plan. Consequently, the site's location in principle accords with the Plan's strategy to locate development in the most sustainable settlements. Furthermore, the site has been assessed by the Council in the SHELAA (January 2024) and confirmed this to be an achievable housing site without any significant development constraints and as the site owned by Persimmon Homes it represents a deliverable site.

The allocation of this site for housing in the draft Local Plan could therefore assist in bolstering the housing supply to deliver a range of housing types, sizes and tenures, including much needed affordable housing, especially in the early part of the plan period and provide greater flexibility. This would help address many of the issues identified to improve the soundness of the strategy set out at Policy SS6 to allocate large strategic sites and address likely delays to delivery likely to be experienced with this strategy, in accordance with the tests set out at Paragraph 35 of the NPPF – ensuring it is positively prepared, justified, effective and consistent with national policy. A vision

document is enclosed with this representation which sets out the background, development issues and opportunities that this site provides.


In summary, Picket Twenty has accommodated growth in previous Local Plans, including the current adopted and draft Plans. The site relates well to the wider Picket Twenty area, with existing sustainable routes connecting between The Middleway and Longden Close to ensure the site is accessible by walking and cycling to a wide range of facilities and services, including primary school, convenience store, children's nursery and community centre. Furthermore, the site is also well located in terms of accessibility to public transport, with bus routes operating both along London Road and Picket Twenty Way providing access to Andover town centre and rail station.

As outlined above, the site has been assessed by the Council as part of its SHELAA and identified as an appropriate site for housing development. This has referenced its current countryside designation as the main development constraint, along with other insurmountable development issues. The countryside designation however could be addressed through allocation for housing development to help meet needs, as a sustainable, achievable and deliverable site. The site is also not constrained by any landscape designations and is not largely visible from its surroundings, as many of the strategic allocations are, and is not located within or in close proximity to any heritage assets or any sites of national or international importance for nature conservation and is located within Flood Zone 1, low risk. Although the site adjoins an area of ancient woodland/SINC, the site can deliver a truly landscape-led development that includes appropriate buffer zones to ancient woodland in accordance with Natural England and Forestry Commission guidance to avoid adverse impacts and other open spaces to enable a network of interconnected green spaces to be created that are well related to and will help complement Harewood Common to promote biodiversity and informal recreation.

The east of The Middleway site is well contained and defined by strong defensible boundaries, with highway and woodland boundaries that create a natural extension to Picket Twenty and a rounding off of the settlement to prevent uncontrolled sprawl into the wider countryside (as recognised at paragraph 1.1.109 of the Landscape Sensitivity Study). Overall, the land east of The Middleway is available, suitable and deliverable under the terms of the NPPF and the development would meet the NPPF definition of sustainable development. As such the site should be considered positively for a housing allocation to provide a minimum of 280 new homes in the Council's emerging Local Plan.

The opportunity to comment on the Regulation 18 – Stage 2 draft Local Plan is appreciated and it is respectfully requested that the Council takes into account the comments made and support this proposed allocation in order to help accommodate the Borough's housing need and improve the soundness of the plan. We would welcome the opportunity to meet to discuss these representations and the east of The Middleway site further, however in the meantime please do not hesitate to contact me if you have any queries.

Yours faithfully


Robert Collett BA(Hons) MTP MRTPI PIEMA
Associate Director


Encs: Vision Document, dated March 2024

LAND EAST OF THE MIDDLEWAY, PICKET TWENTY

Vision Document

March 2024

LUKEN  BECK



Developer: Persimmon Homes (South Coast) Ltd

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Disclaimer

This document has been prepared by Luken Beck on behalf of our client for the purposes set out in this statement. All drawings within this document are not to scale and only for diagrammatic and illustrative purposes. This document should be read in conjunction with the supporting technical reports, plans and drawings.

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Our Vision

Andover is the most sustainable settlement in northern Test Valley, which provides a full range of facilities and services, including employment, retail, education and leisure uses, to meet the needs of residents of the town and the wider area, and possibly outside of the Borough. The town is also highly accessible, with good levels of public transport, including a mainline railway station.

Andover has been, and remains to be, the focus of development in the north of the Borough, with sustainable urban extensions taking place to the east of the town to accommodate the Borough's growth and meet housing needs, including at Picket Twenty.

The land east of The Midleway site is sustainable, being accessible to local facilities and services and public transport and is well contained with relatively few constraints to development. The key constraint is the adjacent area of ancient wood and SINC where appropriate buffers can be incorporated to provide a network of connected green spaces, to create a development to help meet the needs of the Borough in a location that is well related to the existing settlement and with defined boundaries that creates a natural extension and rounding off of the settlement.

"A locally distinctive and well connected neighbourhood of mixed housing types and tenures that protects the integrity of the adjacent ancient woodland and is well integrated to the wider Picket Twenty by sustainable modes of travel and accessible to a range of facilities and services to represent a natural extension to the town"

Key Benefits

- Provides housing to help meet the needs of the local area in a highly sustainable location
- Protects the integrity of the ancient wood and SINC
- Provides landscape buffers to provide a soft development edge to the east
- Integrates well with the wider Picket Twenty area and is accessible to local facilities and services and by public transport
- Enhancement of natural habitats to deliver at least 10% biodiversity net gain
- Is owned by Persimmon Homes, to ensure development is deliverable

INTRODUCTION

LAND EAST OF THE MIDDLEWAY, PICKET TWENTY

Purpose of this Statement

This Planning Statement has been produced by Luken Beck on behalf of Persimmon Homes (South Coast) Ltd, in response to the draft Test Valley Local Plan 2040 Regulated on 18 Stage 2 consultation and the need to meet the Borough's future housing requirement through focusing development in the most sustainable locations.

This statement is structured as follows:

Section 2 provides an overview of the site and its surroundings, including its accessibility to community infrastructure, public transport and its visual context when viewed from the surrounding area.

Section 3 covers a review of the most relevant planning policy issues and guidance at national and local level.

Section 4 provides an appraisal of the planning considerations most relevant to a strategic housing allocation in this location, including a summary of the site's transport links, proposed access, flood risk, ecology, tree constraints and heritage.

Section 5 outlines the masterplanning issues and opportunities identified from the appraisal in Section 4. A summary of the masterplanning principles is provided and how they could work in practice through the proposed concept layout.

Section 6 concludes that a development of c.280 dwellings and associated green space would form a sustainable growth option for Picket Twenty, to help meet the housing needs of northern Test Valley.



INTRODUCTION

Site Location & Context

The site measures around 9.5 hectares and is located to the east of The Middleway and south of London Road, to the east of Picket Twenty and around 3.6km east of Andover town centre in Test Valley Borough.

Test Valley is a large, mainly rural area in south west Hampshire that is divided into two areas, largely defined by its different housing market areas – northern Test Valley and southern Test Valley. Over half of the Borough's population live in the 2 main towns – Andover (in the north) and Romsey (in the south).

Andover is situated around 24km north of Romsey, 19.5km north west of Winchester, 26km north east of Salisbury and 23.5km south of Newbury and is the largest town in Test Valley with a population of over 50,000 people. It is recognised in the settlement hierarchy (along with Romsey) as the most sustainable settlement. It has a full range of facilities and services, good access to jobs and has a high level of accessibility by public transport, with good bus services and a mainline railway station, providing regular and direct services to London – around 1 hour, 10 minutes and Salisbury – around 19 minutes. The town is also accessible by the main road network, with the A303 running east west to the south of the town, which is a key strategic route to the south west and connects to the A34 and onwards to Basingstoke in the east.

As the largest town in the Borough and the most sustainable settlement in northern Test Valley, Andover has been the focus for housing growth in this part of the borough. This has included the development of new communities at Picket Twenty, Picket Piece and Augusta Park.

Site Description

The site is currently in agricultural use and measures around 9.5 hectares. It is located east of The Middleway, south of London Road, to the east of Picket Twenty and Andover town centre.

The site lies to the east of the Picket Twenty housing allocation for 300 homes in the adopted Revised Local Plan 2011-2029 (Policy COM6A), much of which has now been consented and is under construction by Persimmon Homes.

The site's northern boundary is marked by London Road (B3400). London Road is characterised by linear development fronting the road, with large detached residential properties set within large plots, farm buildings/barns and buildings in commercial use, including to the west of the site frontage and north west at Harewood Farm. The site's northern boundary with London Road provides site access and is marked by sparse and gappy vegetation.

The eastern boundary adjoins an existing residential property named 'Houndshott', accessed off London Road, with its associated paddocks used for horse grazing.

The site's southern boundary adjoins the Repented Ancient Wood and, known as Houndshott Copse, forming part of Harewood Forest and which is designated as a Site of Importance for Nature Conservation (SINC).

The western boundary of the site adjoins The Middleway, which is a highway accessed off London Road in the north and is characterised by mainly large detached residential properties set within substantial plots. There are two footpath connections running east-west from Longden Close, connecting the Picket Twenty housing allocation in the west with The Middleway. The site boundary is marked by existing tree and hedgerow planting, with an existing site access towards the south-west.

The site is largely open and largely featureless, with a general north-east to south-west downward slope. The key feature within the site is a belt of trees that bisects the site towards the west, following the rear boundaries of properties fronting The Middleway and effectively dividing the site into two fields.



INTRODUCTION



Access to Existing Amenities

The site is situated in a sustainable location to east of Picket Twenty and close to Andover which has a range of local facilities and services with walking and cycling to meet the needs of residents, including:

	Type of Amenity	Amenity/Location	Distance from the Site (approx)
1	Allotments	Picket Twenty Allotments	450m
2	Primary School	Pilgrims Cross Primary School, Picket Twenty Way	850m
3	Community Centre	Picket Twenty Way	950m
4	Children's Nursery	Busy Bees Nursery, Picket Twenty Way	1km
5	Convenience Store	Co-op, Picket Twenty Way	1km
6	Recreation Ground	Picket Twenty Recreation Ground	1.2km
7	Secondary School	Winton School, London Road	2.5km
8	Employment	Harewood Farm	300m
9		Walworth Business Park	1.9km

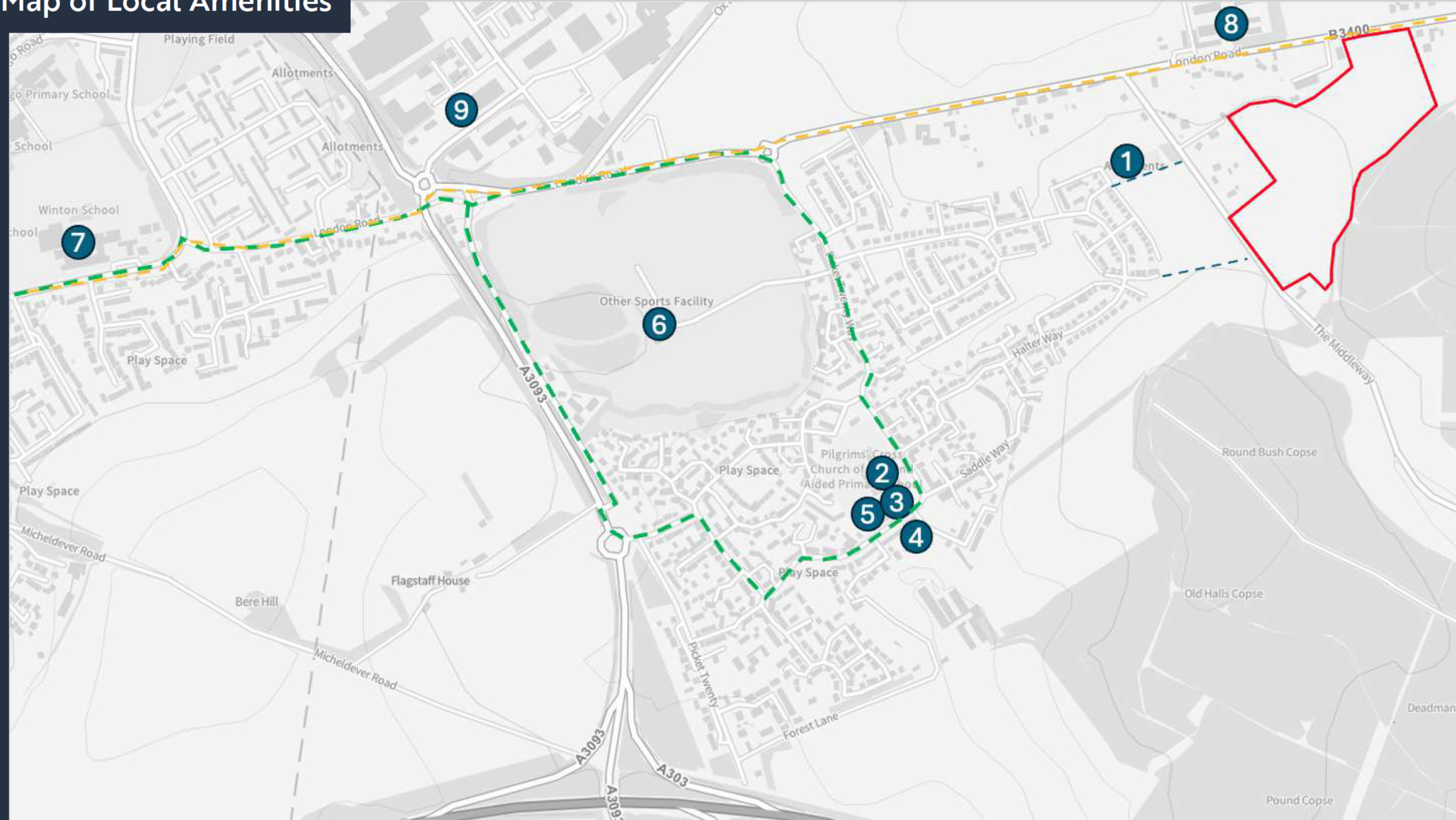
The site is located around 3.6km from Andover town centre, which provides for wider retail, service and recreational needs.

The site is also well located in terms of access by public transport, with the Stagecoach number 76 providing a service between Andover and Basingstoke, routing along London Road and with bus stops close to the site. This provides access to Andover town centre in around 20 minutes and the train station in around 30-35 minutes.

The Stagecoach P20 service provides a circular route around Picket Twenty to Andover town centre, with bus stops located on Picket Twenty Way. This provides access to Andover town centre in around 14 minutes.



Map of Local Amenities



National Policy

National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF), published in December 2023, provides guidance for Local Planning Authorities (LPAs) in drawing up plans for development. The NPPF establishes a 'presumption in favour of sustainable development' which means approving development that accords with the statutory Development Plan without delay.

The NPPF confirms the purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7). Furthermore, Paragraph 8 advises that there are three overarching objectives to sustainable development, namely economic, social and environmental. With regard to each objective, the NPPF defines the purpose as;

An Economic Objective: To help build a strong, responsive and competitive economy ensuring that sufficient and of the right types of jobs are available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.

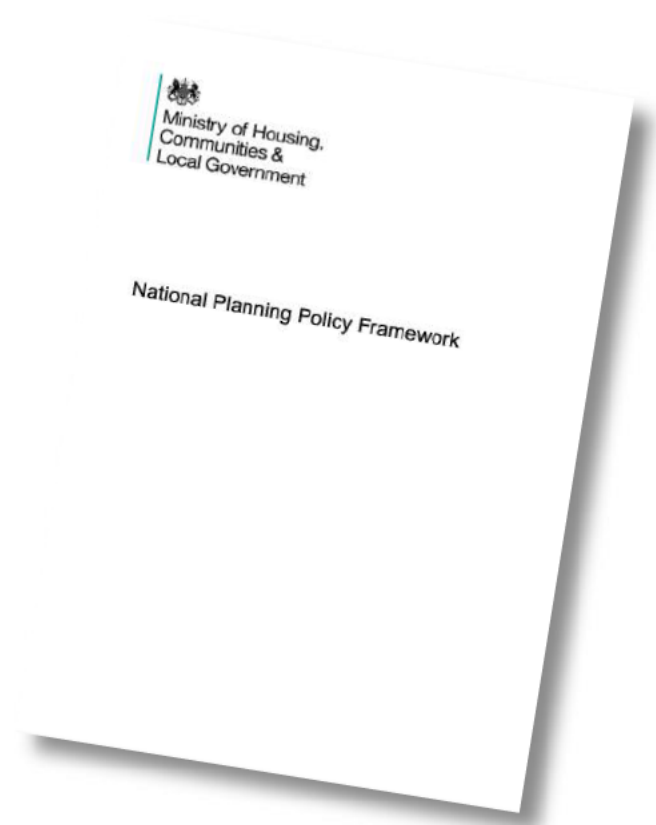
A Social Objective: To support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural wellbeing; and

An Environmental Objective: To contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

A presumption in favour of sustainable development is at the core of the NPPF which means that LPAs need to positively seek opportunities to meet the area's development needs. With specific regard to housing delivery, the NPPF also seeks to significantly boost the supply of housing. This includes a requirement to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area. The NPPF advises that deliverable sites should be available now, offer a suitable location for development and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

On delivering and maintaining a sufficient supply of new homes, Paragraph 60 sets out;

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permissions developed without unnecessary delay."



The NPPF sets out in Paragraph 69 that strategic policy making authorities should have a clear understanding of the land available in the area through the preparation of a strategic housing and availability assessment (SHLAA). LPAs are expected to identify a sufficient supply and mix of sites, taking into account the availability, suitability and likely economic viability. Policies are expected to identify a supply of:

"a) specific, deliverable sites for five years following the intended adoption; and

b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the remaining plan period."

'Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly'

(Para 70, NPPF December 2023)

Planning Practice Guidance (PPG)

In addition to the NPPF, the Planning Practice Guidance (PPG) provides guidance for LPAs on the factors that should be considered when assessing the suitability of sites and broad locations for development. A site can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and the potential to be mitigated. The following factors are considered to form part of the assessment of site suitability for development and in the future;

- › national policy;
- › appropriateness and likely market attractiveness for the type of development proposed;
- › potential impacts including the effects upon landscapes including landscape features, nature and heritage conservation...

Both the NPPF and PPG are significant material considerations in terms of establishing the principle of development on this site, with particular regard to the following:

- The presumption in favour of sustainable development
- Andover is identified as the only Tier 1 and the most sustainable settlement in northern Test Valley, which is identified to support future housing delivery
- The site would allow housing to be delivered in a sustainable way, reducing reliance on less sustainable settlements
- The site is relatively unconstrained. Its 'suitability' for residential development compares favourably when assessed against policies of the NPPF
- The site is owned by Persimmon Homes and as such is a 'deliverable' housing site in the short term
- There is doubt over the ability of the draft allocations in northern Test Valley to deliver the required quantum of housing and to suitably phase delivery throughout the plan period
- The east of The Middleway site could accommodate c.280 dwellings, to help boost housing delivery in the Borough and particularly the delivery of much needed affordable housing in the early years of the Plan period
- Development of the east of a new community east of The Middleway is achievable, viable and meets site specific infrastructure requirements
- Demonstrating that the proposals are well related to existing development, facilities and services and represent a logical extension to Picket Twenty, and is accessible by public transport. The development extent is contained by the defined site boundaries and will not harm the National Landscape, the Houndshott Copse Ancient Wood and SNC or the wider countryside

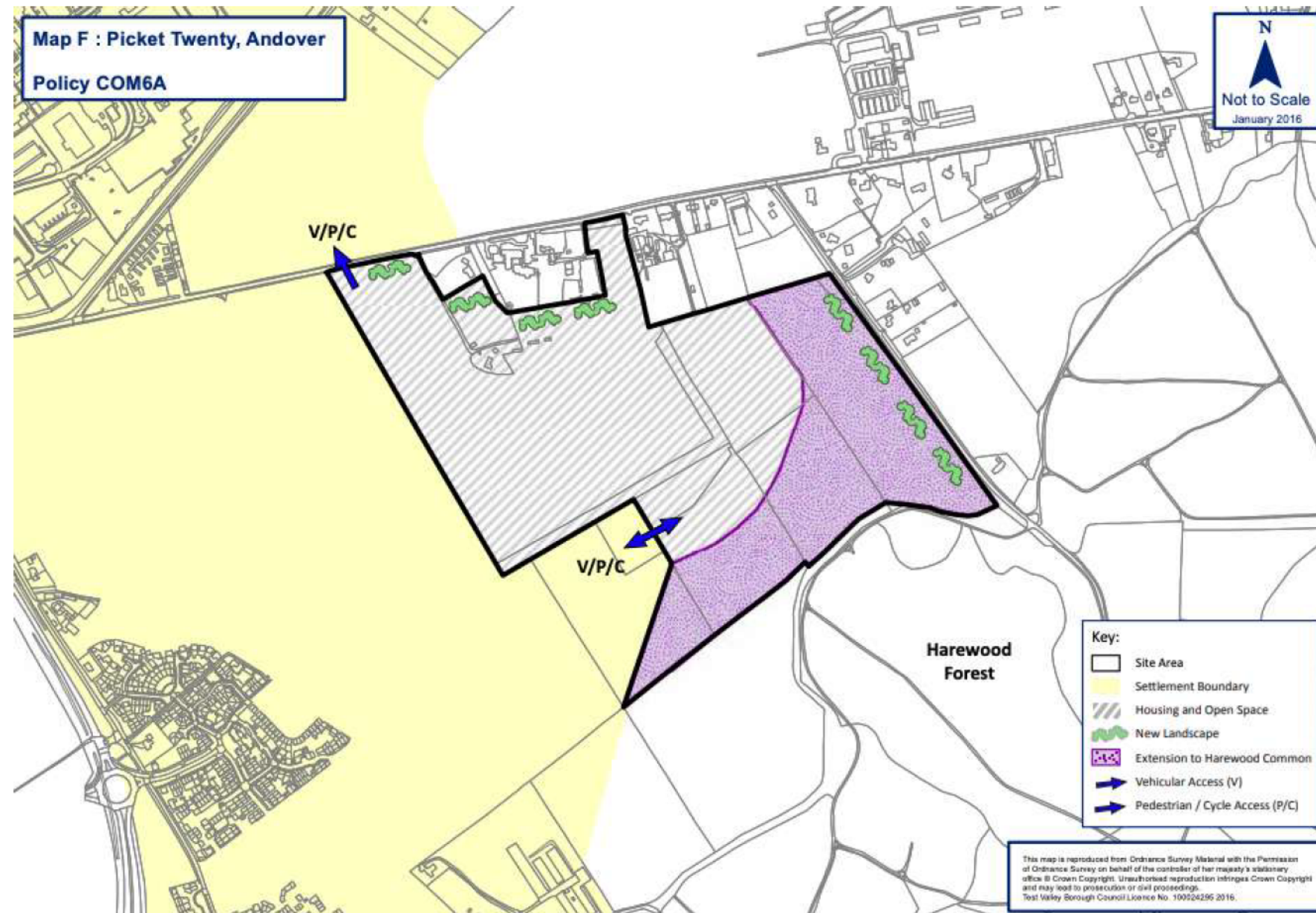
Local Policy

Adopted Revised Test Valley Borough Local Plan 2011-2029

The Revised Test Valley Borough Local Plan 2011-2029 was adopted by the Council on 27 January 2016. Policy SD1 'presumption in favour of sustainable development' seeks to direct development to the most sustainable locations. Table 7 sets out the Borough's settlement hierarchy, identifying Andover as a 'Major Centre' (the highest order settlement).

Policy COM1 'Housing Provision 2011-2029' identifies a housing requirement for northern Test Valley of 7,092 new homes for the plan period, of which 6444 are to be delivered at Andover. These are to be delivered through completion, commitments, unplanned development and the allocation of strategic sites.

Paragraph 5.87 states 'The settlement hierarchy identifies Andover as the most sustainable settlement in the area and is therefore the most appropriate location to allocate new housing' and the housing needs are to be delivered at the existing commitments at East Anton and Picket Twenty, along with an allocation for a new neighbourhood at Picket Piece for approximately 400 dwellings (Policy COM6) and a new neighbourhood at Picket Twenty of approximately 300 dwellings (Policy COM6A).



Draft Test Valley Local Plan 2040: Regulation 18 Stage 2 (2024)

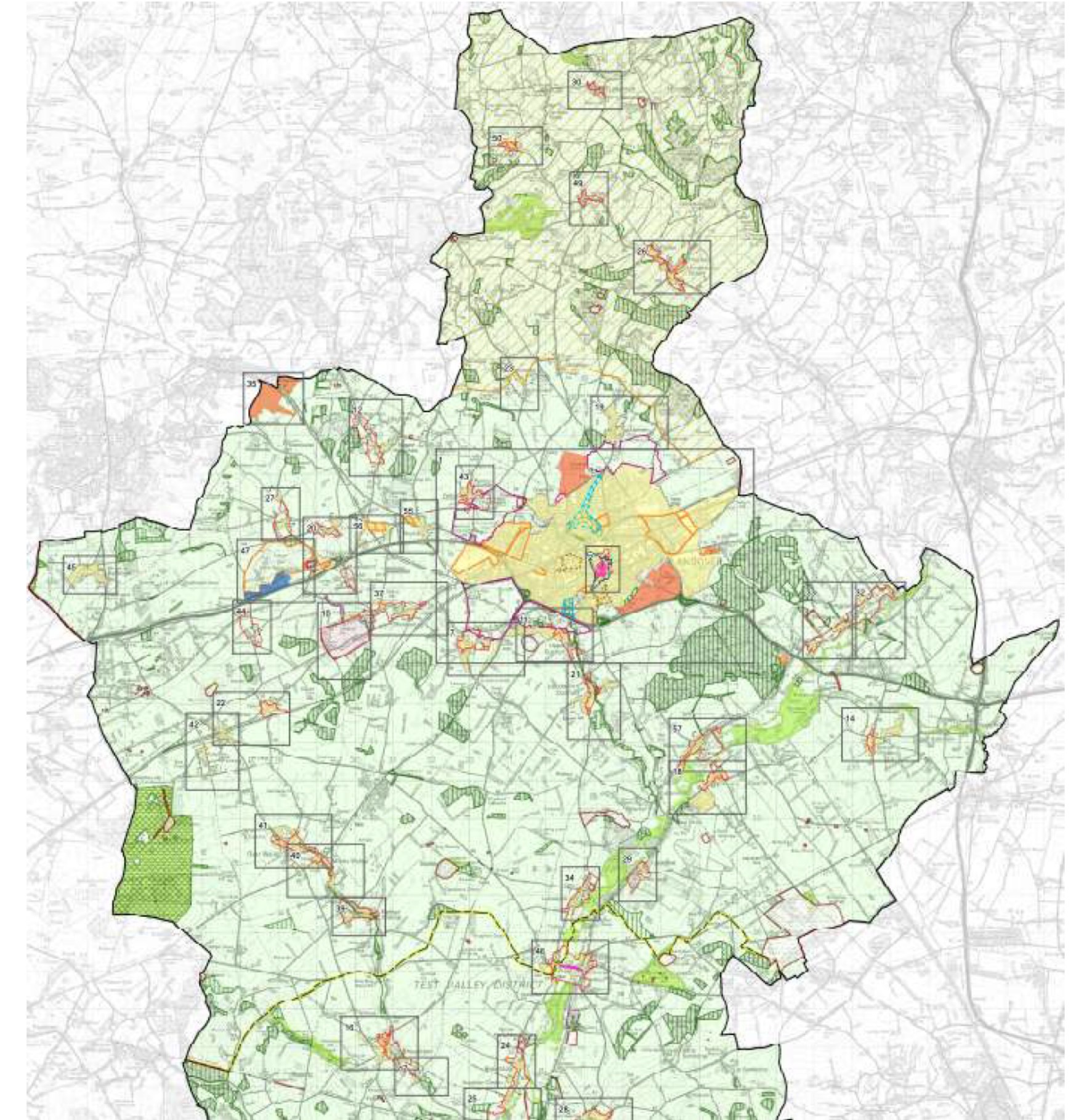
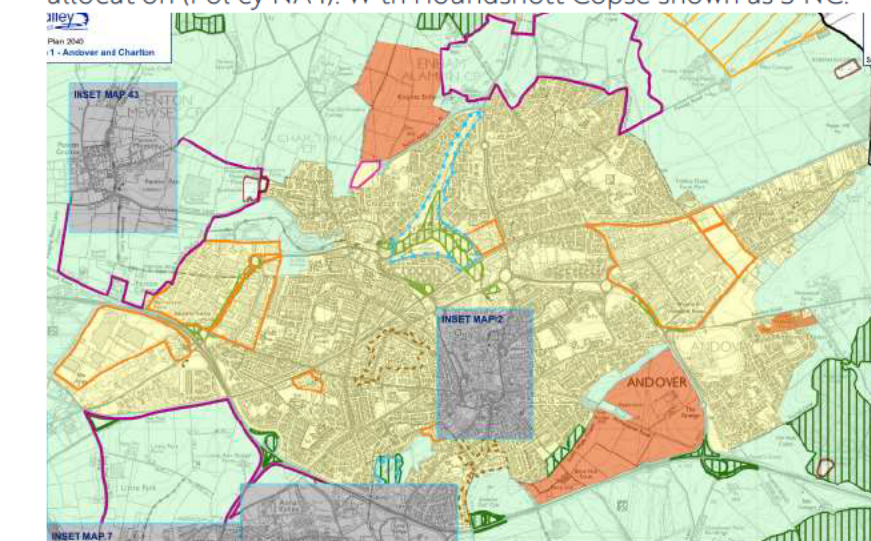
The draft Local Plan sets out the Council's vision and objectives for future development in the Borough for the period 2020-2040. The draft plan supports the spatial strategy of the adopted Revised Local Plan, recognising Andover as a Tier 1 settlement (Policy SS1) and a sustainable location to accommodate.

Policy SS3 sets out the spatial strategy for the Borough, identifying a minimum housing requirement for northern Test Valley of 6,270 new homes over the plan period. These sites to be delivered as housing completions, commitments, strategic allocations and the rural housing requirement, with the following strategic allocations identified in northern Test Valley:

- Land south of London Road, East Andover 90 homes
- Land at Manor Farm, North of Saxon Way, N Andover 800 homes
- Land at Bere Hill, South East Andover 1,400 homes
- Land East of Ludgershall 350 homes
- Land South East of Ludgershall 1,150 homes

Ludgershall is located within Wiltshire Council's area, where allocations for a further 1,220 homes are proposed in the emerging Wiltshire Local Plan.

The sites identified as countryside on the draft proposals map located to the south east of the Land South of London Road allocation (Policy NA4). With Houndshott Copse shown as SNC.



In response to the comment about the settlement policy boundary, the staff noted that the settlement policy boundary has been extended to include the wider Pocket Twenty and it is reasonable to assume that once developed, the boundary will be further extended to include the south of London Road draft allocation, so the eastern boundary adjoining The Middleway. Notwithstanding this and given the residential and commercial developments along London Road, it may be prudent to extend the boundary now in any event.

Site Details									
SHELAA Ref	340	Site Name	Land East of the Middleway						
		Settlement	Andover Down						
Parish/Ward	Andover Downlands				Site Area	9.5 Ha	Developable Area	6.3 Ha	
Current Land Use	Agricultural				Character of Surrounding Area	Residential, woodland and commercial			
Brownfield/PDL	<input type="checkbox"/>	Greenfield	<input checked="" type="checkbox"/>	Combined	<input type="checkbox"/>	Brownfield/PDL	Ha	Greenfield	Ha
Site Constraints									
Countryside (COM2)	<input checked="" type="checkbox"/>	SINC	<input checked="" type="checkbox"/>	Infrastructure/ Utilities	Other (details below) <input checked="" type="checkbox"/>				
Local Gap (E3)		SSSI		Land Ownership					
Conservation Area (E9)		SPA/SAC/Ramsar		Covenants/Tenants					
Listed Building (E9)		AONB (E2)		Access/Ransom Strips					
Historic Park & Garden (E9)		Ancient Woodland	<input checked="" type="checkbox"/>	Contaminated Land					
Public Open Space (LHW1)		TPO	<input checked="" type="checkbox"/>	Pollution (E8)					
Employment Land (LE10)		Flood Risk Zone		Mineral Safeguarding					

Proposed Development				
Availability				
Promoted by land owner	<input checked="" type="checkbox"/>			
Site Available Immediately	<input checked="" type="checkbox"/>			
Site Currently Unavailable	<input type="checkbox"/>			
Achievability/Developer Interest				
Promoted by developer	<input checked="" type="checkbox"/>			
Developer interest	<input checked="" type="checkbox"/>			
No developer interest	<input type="checkbox"/>			
Deliverability				
Could commence in 5yrs	<input type="checkbox"/>			
Unlikely to commence in 5yrs	<input checked="" type="checkbox"/>			
Possible self build plot provision				
Yes	<input type="checkbox"/>			
No	<input checked="" type="checkbox"/>			
		Residential	<input checked="" type="checkbox"/> 280	Dwellings
		Employment		Floor Space (m²)
		Retail		Floor Space (m²)
		Leisure		Floor Space (m²)
		Traveller Site		Pitches
		Other		
Mixed Use Scheme				
		Residential		Dwellings
		Employment		Floor Space (m²)
		Retail		Floor Space (m²)
		Leisure		Floor Space (m²)
		Other		



Highways & Access

A highways appraisal has been completed by Paul Basham Associates to assess the highways impacts of the provision of around 280 dwellings on site, accessed off London Road (B3400).

Local Highway Network

London Road (B3400) is situated along the site's northern boundary and provides a connection between Andover town centre (to the west) and Whitchurch and Basingstoke (to the east).

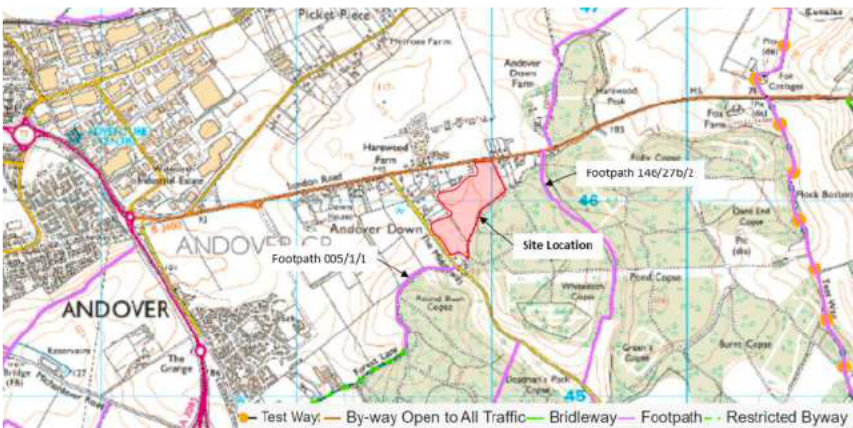
Walking & Cycling

There are two existing links from Longden Close towards The Midway, that allow for connections to be provided from the site to promote travel by sustainable modes to existing facilities, services and public transport in Picket Twenty. These routes could be upgraded to foot/cycle routes as part of any development.

Public Rights of Way

The site is situated in proximity to a number of Public Rights of Way footpaths with recreational routes and links towards local facilities. Footpath 146/27b/2 is located to the east of the site and provides a connection to the north and south of the site, linking to further footpaths and providing a recreational route for residents. In addition, to the east is the Test Way, which is a 44 mile recreational route between Hampshire and West Berkshire.

Footpath 005/1/1 is located to the south west of the site and provides links towards Andover via a restricted byway. From here, the route connects to surrounding infrastructure and further Public Rights of Way footpaths which provide links towards local facilities.



There are also a variety of footpaths, on road cycle tracks and off road cycle routes which connect into Picket Twenty and provide connections towards facilities within Andover. As the site will provide direct connections into Picket Twenty, there will be direct access to existing pedestrian and cycle infrastructure.



Public Transport

The site is located in proximity to two eastbound and two westbound bus stops on London Road. Psa Cottages bus stops are located around 450m east (5½ minute walk) and to the west Arbory Care Home bus stops, located around 1km (12 minute walk). The development however could fund the delivery of new bus stops along this route, if required. The site is also located around 900m from bus stops on Picket Twenty Way (around 9 minute walk).

Bus service 76 routes along London Road and provides a frequent service every 30 minutes (Monday Saturday) and an hourly service on a Sunday between Andover and Basingstoke.

Bus service P20 operates a circular service between Andover town centre and Picket Twenty, along Picket Twenty Way and provides a frequent service every 30 minutes Monday Saturday and an hourly service on a Sunday.

Andover railway station is located around 4.8km west of the development site and can be accessed by the bus service 76 and the journey takes around 35 minutes. The station can be reached by a 16



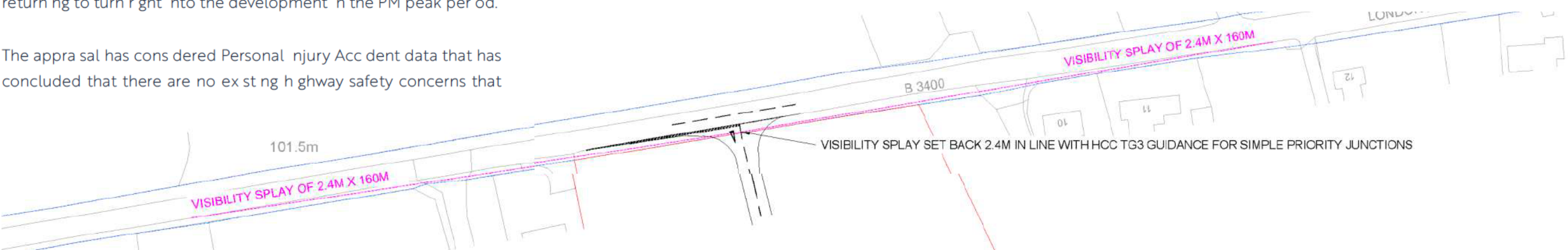
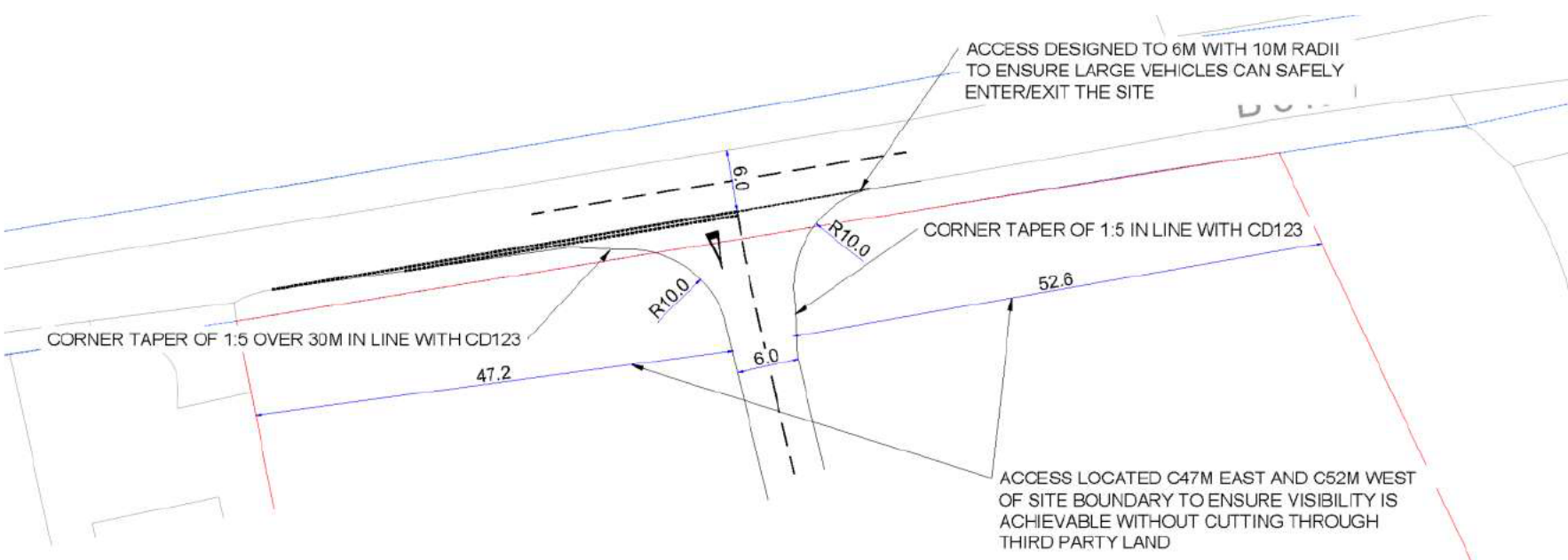
Proposed Site Access

The TRCS database has been used to calculate potential trip generation and has identified that a 280 home development could generate up to 145 two way movements in the AM peak period, 143 two way movements in the PM peak period and up to 1,288 movements across a 12 hour period.

Guidance indicates that based on the minor road flows (site access), a right turn lane should be considered. However, as the major road flows (B3400) are expected to be relatively low, a simple priority junction could be acceptable. Therefore, a simple priority junction measuring 6m with 10m radii with 1:5 corner tapers has been designed in the centre of the frontage along London Road.

Census data (2011) has established the potential route that future residents will take, with 89% likely to turn left out and 11% turn right. This would see 96 trips turn left out in the AM peak period, 87 returning to turn right into the development in the PM peak period.

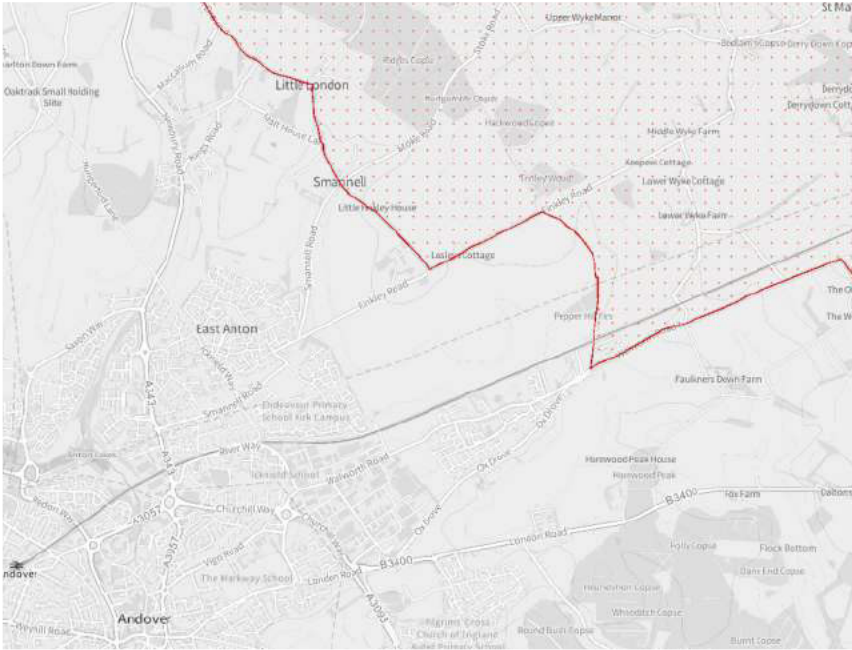
The appraisal has considered Personal Injury Accident data that has concluded that there are no existing highway safety concerns that



Landscape

Statutory Designations

The site is not located within an area subject to a national or local landscape designation. The closest landscape designation is the North Wessex Downs National Landscape (formerly called Area of Outstanding Natural Beauty), which is situated around 1.5km to the north. Due to the intervening distance and topography, it is not considered that the development of the site would have any impacts on the National Landscape designation.



The Council's Landscape Sensitivity Assessment (January 2024) identifies that the site is as being of 'local landscape value', due to its moderate degree of representation of the wider landscape character and key positive landscape characteristics, which includes the regular field pattern and wood and edge, with the adjacent wood and being the prominent landscape feature.

The eastern part of the site is identified as being 'less tranquil and more open' due to surrounding development and noise from London Road, which creates a noticeable sense of intrusion and interruption and is referenced as being of moderate to high sensitivity to change due to its relatively open landscape.

The western part of the site is identified as being 'more tranquil' due to its enclosed nature by existing tree belts and having a lower (moderate) sensitivity to change due to its visual containment and relationship with the settlement, where existing defensive boundaries could be strengthened by planting.

Paragraph 1.1.109 outlines that the site forms the eastern edge of the settlement that comprises sporadic development along London Road, beyond the more built-up and higher density Picket Twenty and furthermore that Harewood Forest 'forms a clearly defined and defensible settlement edge to the south of London Road'.

The assessment concludes that the existing local green infrastructure should be conserved and enhanced, securing connectivity with the adjacent landscape, with reference to a 50m minimum buffer as a focus for semi-natural greenspace.

As the site is well contained, it is not vulnerable from any public rights of way, with any views largely restricted to immediate local views from London Road and The Midway. Any impacts however can be suitably addressed through a good quality landscaping scheme.

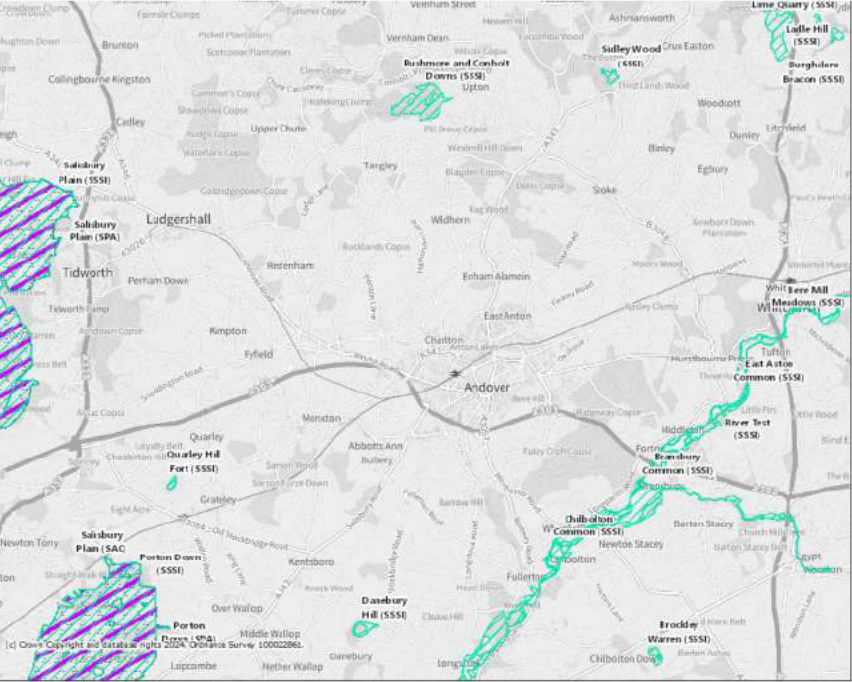
Any development proposals would need to be accompanied by a site-specific Landscape and Visual Impact Assessment (LVIA). The development concept however demonstrates that a scheme could include an appropriate buffer to protect the integrity of the ancient wood and edge and provide space for landscaping, recreational routes and promote biodiversity, whilst achieving connectivity of green infrastructure networks within the site and the wider area. It is not considered however that a 50m buffer is necessary and this can be achieved with the Natural England and Forestry Commission's guidance of 15m.

Due to the site's topography and general north-south downward slope, views of the ancient wood are likely to be maintained. The development however could also be sensitively structured and designed, so that key views through the development are provided towards the ancient wood and, to respect to the importance of the existing landscape feature. Landscaping could also be strengthened to the London Road frontage to reinforce the site's defined edge of settlement location and the existing tree belt through the site maintained, with the provision of accesses restricted, to protect its integrity.



Ecology & Biodiversity

The site does not lie within a site of national or international importance for nature conservation. The closest site of national nature conservation importance is the East Aston Common SSSI that is located around 3.7km south-east and the closest site of international importance is the Porton Down SPA/Salisbury Plain SAC, around 15.2km west, on the other side of Andover. As such the site can be appropriately developed without affecting any sites of national or international importance.



Houndshott Copse, adjoining the southern boundary of the site is identified as a Registered Ancient Wood and designated as a SSSI. Although it could be assumed that without mitigation on development close to the site's southern boundary could have an adverse impact on the ancient wood and, guidance from Natural England and Forestry Commission titled 'Ancient wood and ancient trees and veteran trees: advice for making planning decisions' advises that proposals should have a buffer zone of at least 15 metres from the boundary of the wood and to avoid root damage and possibly larger impacts are shown to be greater.

The buffer zone should contribute to wider ecological networks and be part of the green infrastructure of an area and consist of semi-natural habitats, establishing habitat with local and appropriate native species. It should not include development or garden areas and only include sustainable drainage systems where it does not affect the root system of the wood and any change to the water table does not negatively affect the ancient wood and.



The draft concept plan for the site incorporates relevant buffer zones in accordance with guidance from Natural England and Forestry Commission, to ensure that the development proposals avoid adverse impacts on the ancient wood and.

The buffers are incorporated into the landscaping and green infrastructure, providing space for appropriate planting to help enhance biodiversity, opportunities for public open space and linkages to wider open space networks, as a possible further extension to Harewood Common.

The site consists of two largely open and featureless arable fields, separated by a landscaped tree belt. As cultivated and actively farmed land, the site does not itself offer any significant ecological constraints, although the site margins may be of more interest and the possibility of bat commuting and foraging along the tree belt/wood and edge. In general the site is of low ecological potential.

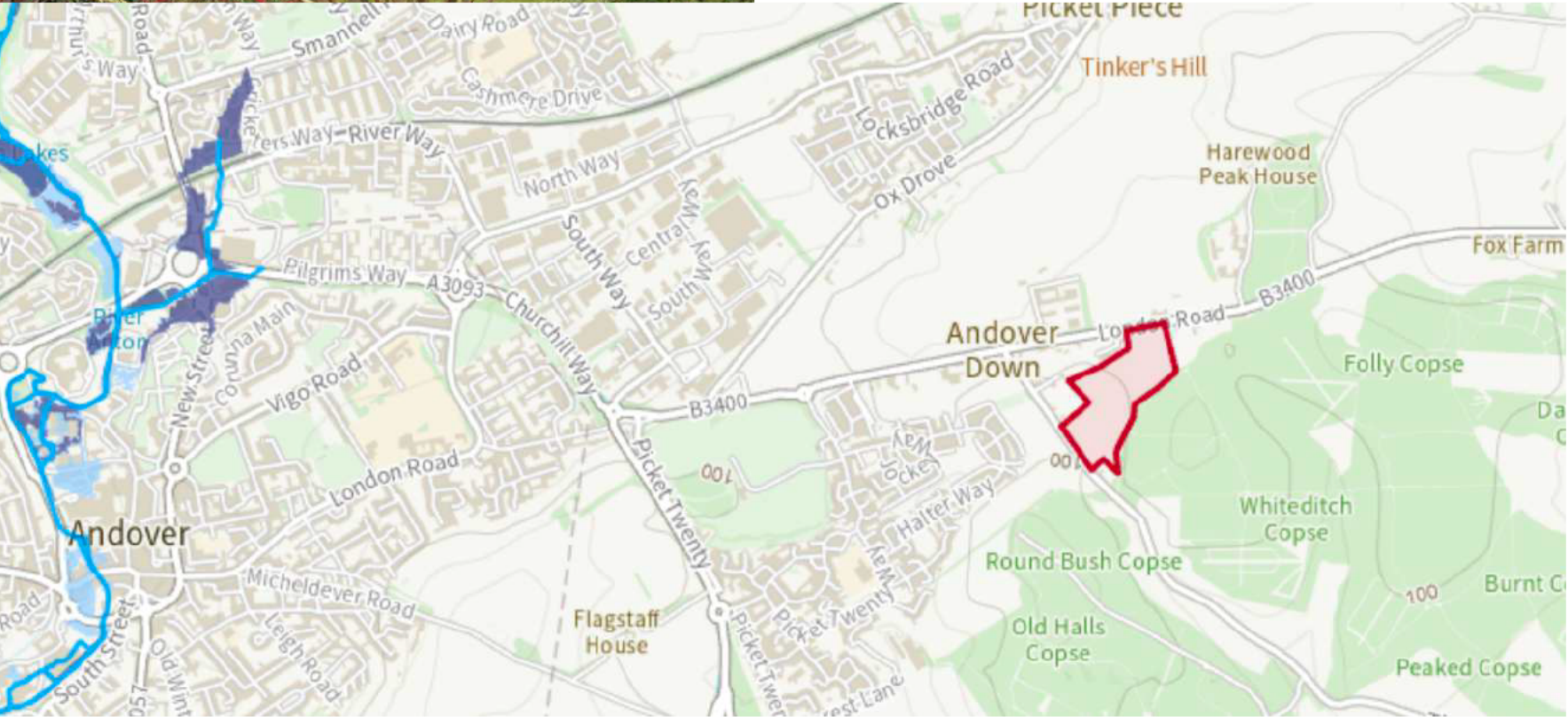
The tree belt through the site offers more ecological interest and development proposals can be progressed that seek to protect this landscaped feature, restricting the creation of any accesses through it to a minimum and providing enhanced planting as part of the site's green infrastructure and interconnected network of green spaces for public open space and biodiversity.



Flood Risk & Drainage

The site is located within Flood Zone 1 (low risk), as identified on the Environment Agency's flood maps and is unaffected by surface water flooding. As such the site is appropriate for development in flood risk terms.

Any development proposals will need to include a sustainable drainage systems (SuDS), comprising surface water attenuation, which could also provide biodiversity enhancement. The SuDS system will need to attenuate surface water runoff to current greenfield rates to ensure that post development surface water runoff is the same as existing and that the development does not lead to increased flood risk off site.



Heritage

The site is not located within or adjacent to a conservation area, does not contain any listed buildings or other on-site or adjoining, does not contain a scheduled ancient monument or other on-site or adjoining and is not located within an area of acknowledged archaeological sensitivity.

It is not considered therefore that the development of the site would cause harm to any heritage assets.



DEVELOPMENT CONCEPT

Development Concept

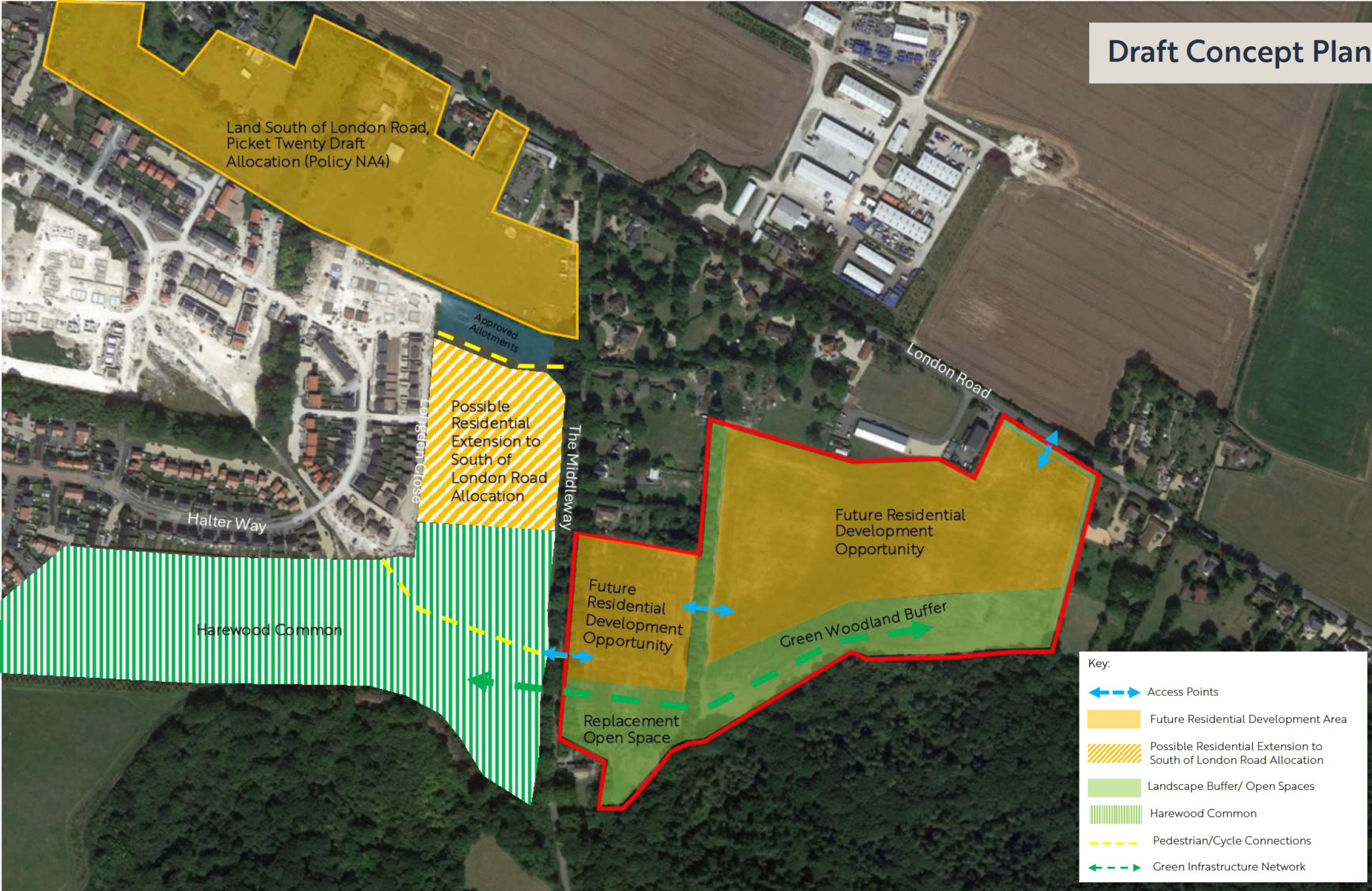
The site assessment has identified key opportunities and influences that have helped to inform the preparation of an indicative concept plan for the site to show how it can integrate effectively with its surroundings, as follows:

- › A landscape-led development that incorporates appropriate buffers to the ancient wood and in the east and development to the north and respects the existing tree belt that bisects the site to create a network of connected green spaces and open spaces to create an attractive development and opportunities for good quality native planting to help promote biodiversity
- › Creation of sustainable travel links, with pedestrian and cycle routes to connect with existing routes to Picket Twenty, to ensure good quality accessibility to facilities and services
- › Good access to existing bus routes
- › Development of around 280 new homes, providing a mix of dwelling types, sizes and tenures plus the possible extension of the South of London Road allocation, to provide more homes, with replacement open space on The Middleway site
- › Delivery of 40% affordable housing, in accordance with policy to help meet local housing needs
- › A mixed density to respect the site's setting, with lower density development towards the northern and eastern boundaries
- › Use of good design, mixed palette of materials and landmark buildings to create an attractive and legible development
- › Delivery of an appropriate SUDS drainage scheme to ensure that the development appropriately controls surface water drainage without increasing flood risk elsewhere
- › A principal vehicle access from London Road (B3400), with appropriate levels of visibility to ensure that a suitable form of access can be provided with highway capacity
- › There are no significant views into the site from the surrounding area, such that development can be suitably accommodate without significant impact

The site is well related to existing development at Picket Twenty and is well contained by its boundary features, with highways to the north and wood and to the east to appear as a natural extension and rounding off of the settlement (as recognised at Paragraph 1.1.109 of the Landscape Sensitivity Study).



Draft Concept Plan



DELIVERABILITY

LAND EAST OF THE MIDDLEWAY, PICKET TWENTY

Site Suitability

Paragraph 60 of the NPP sets out that to significantly boost the supply of new homes, it is important that a sufficient amount and variety of land can come forward where it is needed, with the overall aim to meet as much of an area's identified housing need as possible, with an appropriate mix of housing types for the local community.

The suitability of the site for residential development is generally accepted by the Council in its SHELAA and although the site is currently located within the countryside, it is well related to Andover which is a tier 1 settlement where sustainable growth is accepted and where strategic allocations are identified. The site can be appropriately developed as an allocation in the emerging Test Valley Local Plan.

The site can provide good quality sustainable travel links for pedestrian and cyclists to promote sustainable forms of travel to existing facilities and services and public transport.

A review of Environment Agency flood map data has identified that the site is located within Flood Zone 1. The site does not contain and is not located in close proximity to any area of designated landscape sensitivity or of national or international significance for nature conservation.

The site adjoins an area of ancient wood and (replanted)/SINC, however suitable landscape buffers can be incorporated into any development to avoid any adverse impacts and provided with good quality native planting to promote biodiversity, with a landscape-led development that creates a network of connected green space.

The site's topography ensures that the site can be appropriately developed without any significant impacts on the surrounding area.

Site Availability

The site is owned by Persimmon Homes, who would be the developer for the site. As such there are no legal or ownership issues that would prevent or constrain the development of the site in the short term.

Site Achievability

A comprehensive development of c.280 homes is considered achievable in the short term if the land is suitably allocated to allow an early planning application to come forward and help deliver housing in the first five years of the plan.

The site could therefore help to contribute to the housing needs of the Borough and ensure continuity of supply as required by the NPP and help address any delays in delivery elsewhere.

DELIVERABILITY

CONCLUSIONS

Conclusions & Summary

The land east of The Middleway, Picket Twenty site is located on the eastern edge of Andover in northern Test Valley. Andover is the principal settlement in the Borough and the only tier 1 settlement in north Test Valley, where future housing growth is promoted.

Picket Twenty has accommodated housing growth in previous Local Plans, with the current draft plan including land south of London Road for housing development. The east of The Middleway site relates well to Picket Twenty and is accessible by walking and cycling to a wide range of facilities and services and public transport and is also accessible to Andover town centre for wider needs and the main local station to major regional and national centres.

The site has been assessed by the Council as part of its SHELAA and identified as an appropriate site for housing development. This has referenced its current countryside designation as the main development constraint, along with other insurmountable development issues. The countryside designation however could be addressed through allocation for housing development to help meet needs, as a sustainable, achievable and deliverable site.

The site is not constrained by any landscape designations and is not located within or in close proximity to any heritage assets or any sites of national or international importance for nature conservation. The site adjoins an area of ancient wood and SINC and appropriate buffer zones can be incorporated into any scheme to avoid adverse impacts and create a network of connected green spaces that are well related to and will help complement Harewood Common.

The site is located within Flood Zone 1, low risk and is appropriate for development in flood risk terms. It can be designed with a suitable SUDS scheme to ensure the effective attenuation of surface water to avoid increasing flood risk elsewhere.

The east of The Middleway site is well contained and defined by strong defensible boundaries, with highway and wood and boundaries that create a natural extension to Picket Twenty and a rounding off of the settlement to prevent uncontrolled sprawl into the wider countryside.

The site is owned by Persimmon Homes, who would be the developer for the site and as such the development of the site is achievable and there are no ownership issues that would prevent the delivery of the site in the short term period.

The site can deliver a high quality landscaped led development that delivers a range of housing types, sizes and tenures, including much needed affordable housing to help meet the Borough's housing needs and help to bolster the Local Plan's supply of housing and delivery strategy, to address any shortfalls elsewhere to improve the soundness of the plan. Furthermore, the site can deliver good quality levels of open space and landscaping, to promote biodiversity.

Overall, the land east of The Middleway is available, suitable and deliverable under the terms of the NPP and the development would meet the NPP definition of sustainable development. As such the site should be considered positively for a housing allocation of around 280 new homes in the Council's emerging Local Plan.





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