

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*	Brett
Surname*	Spiller		
Organisation* (If responding on behalf of an organisation)	Chapman Lily Planning Limited on behalf of Woolsington One 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:

Woolsington One 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.

General
<p>Please see cover letter dated 28th March 2024</p>

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 cover letter dated 28th March 2024

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

Chapman Lily Planning Ltd

By email: planningpolicy@testvalley.gov.uk

Date: 28th March 2024
Our Reference: 4224-BS

W: www.CLPlanning.co.uk

Dear Sir / Madam

CONSULTATION RESPONSE IN RESPECT OF THE TEST VALLEY LOCAL PLAN: REG18 STAGE 2 DRAFT

Thank you for the opportunity to comment on the Test Valley Local Plan 2040 Reg18 Stage 2 Draft ["TVLP2040"].

Woolsington One Ltd

I herein respond on behalf of Woolsington One Ltd [hereafter referred to as "W1"], promoters of a c.3.25ha site adjoining Abbots Ann (ref: 300 in the SHELAA – see inset plan). Representations pertaining to the TVLP2040 Reg18 stage 1 consultation and the site were previously put forward to the by Southern and Regional ["S&R"] Developments. I have been cognisant of the previous representations prepared by S&R Developments in preparing this response to the Reg18 stage 2 consultation.

W1 is now owned by Bellway Homes, which are currently the UK's fourth largest housebuilder, having built and sold 10,945 homes in the financial year 2022/23 catering for first time buyers through to more seasoned home buyers and their families. Bellway's reputation is built on designing and creating beautiful developments which meet the needs of today and consider the demands of the



future.

Bellway's Homes are designed, built and marketed by local regional offices managed and staffed by local people. This allows the company to stay close to its customers and take key decisions about design, build, materials, planning and marketing in response to local as opposed to national demands. A simple point, but one that distinguishes Bellway Homes from other housebuilders.



Above: Panoramic taken from north-western corner looking south-east across the site east of Duck Street

Supporting documents

W1 has been cognisant of the evidence base underpinning TVLP2040, as well as the topic papers, notably:

- The interim sustainability appraisal
- Habitats Regulation Assessment
- Infrastructure delivery plan
- Housing trajectory Jan 2024
- Spatial strategy topic paper Feb 2024
- Housing topic paper Feb 2024
- Site selection topic paper Feb 2024
- Duty to co-operate topic paper Feb 2024
- Settlement hierarchy topic paper Feb 2024

This consultation response is accompanied by a suite of appendices as follows:

- A. Site location plan
- B. Abbots Ann: Masterplan / context plan dated March 2024

- C. Transport technical note dated March 2024
- D. Application of Sustainability Appraisal to omission site.

Planning Policy context

In preparing this response, W1 has been cognisant of the National Planning Policy Framework [“NPPF”] and National Planning Practice Guidance [“NPPG”].

In particular paragraphs 15-16 of the NPPF, which state:

The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings.

Plans should:

- a) be prepared with the objective of contributing to the achievement of sustainable development;*
- b) be prepared positively, in a way that is aspirational but deliverable;*
- c) be shaped by early, proportionate and effective engagement between plan makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

Paragraph 17 goes on to highlight that: ‘The development plan must include strategic policies to address each local planning authority’s priorities for the development and use of land in its area’.

Policy 20 clarifies: Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for:

- a) housing (including affordable housing), employment, retail, leisure and other commercial development;*

b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);

c) community facilities (such as health, education and cultural infrastructure); and

d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.'

Paragraph 21 states: *'Plans should make explicit which policies are strategic policies. ...'* and paragraph 22 explains that: *'Strategic policies should look ahead over a minimum 15-year period from adoption. ...'*

Paragraph 23 states: *'Broad locations for development should be indicated on a key diagram, and land use designations and allocations identified on a policies map. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or nonstrategic policies).'*

Paragraph 24 states: *'Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.'*

Paragraph 26 continues: *'Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.'*

Paragraph 27 continues: *'... ... strategic policy making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these. These should be produced using the approach set out in national planning guidance, and be made publicly available throughout the plan-making process to provide transparency.'*

Paragraph 31 states: *'The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.'* Paragraph 32 goes on to state: *'Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should*

demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).'

The Local Plan and spatial development strategies are examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

Positively prepared – *providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; 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;*

Justified – *an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*

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*

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.*

Paragraphs 60-61 state:

‘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 permission is developed without unnecessary delay. The overall aim should be to meet as much of an area’s identified housing need as possible, including with an appropriate mix of housing types for the local community.

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area (see paragraph 67 below). There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that

cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.'

Structure of this consultation response

The structure of this consultation response mirrors that of the Publication Document.

For ease of reference draft policies are highlighted in blue.

W1's headline response (object, conditional support, or support) is highlighted in green together with recommended amendments and reasoning (where appropriate).

W1 has not sought to comment on every policy and paragraph, rather W1 has focussed on those strategic policies and development management policies where W1 has something meaningful to say.

1 INTRODUCTION (pg2)

W1 welcome the acknowledgement of an evolving context, shaped by ongoing behavioural changes, economic changes, environmental changes (not least climate change) and legislative changes. W1 welcome the suggestion that the evidence base will need to evolve alongside the TVLP2040.

Fit with the Corporate Plan (pg5)

W1 welcome the explanation as to the links between the Corporate Strategy and TVLP2040. This underpins the approach to the three place-based areas:

'Andover and Romsey

Chilworth, North Baddesley, Nursling and Rownhams and Valley Park

Villages and rural areas.'

Such this simplistic approach provides clarity, W1 consider that it belies the more complex functional interrelationships between settlements.

Fit with the Climate Emergency Action Plan (pg6)

W1 endorse the explanation as to the potential links between the Action Plan and TVLP2040.

Progress of the TVLP2040 (pg8)

W1 commend TVBC of their staged approach and commitment to engagement.

Plan Period (pg9)

W1 support the plan period 2020-2040, albeit having regard to the Local Development Scheme the effective period will be 2025-2040, which still allows for a 15-year time horizon. It is suggested that this be reflected at the Reg 19 stage.

Evidence base and statutory duties (pg10-11)

W1 welcome the text which provides transparency and ensures that the document is accessible to a broad audience.

2 VISION, KEY CHALLENGES AND OBJECTIVES

National Planning Policy and Guidance (pg 13-15)

The relationship between national policy and Local Plans is often poorly articulated, leading to misunderstanding. W1 welcome the text which provides transparency and ensures that the document is accessible to a broad audience.

Regional context and the Duty to Co-operate (pg15-17)

The Duty to Co-operate is often poorly articulated, so the text is helpful and the presence of the PfSH Spatial Position Statement [“SPS”] to 2026 encouraging. The publication of a duty to co-operate topic paper is also commended, particularly when it comes to considering cumulative impacts upon sensitive international habitats, such as the River Avon, and the availability of strategic mitigation. However, the extent to which the duty to co-operate has been realised in practice has yet to be affirmed.

Vision (pg18)

W1 support the stated vision.

Support.

Updated draft objective: Climate Change (pg19)

W1 support the wording and intent of this spatial objective.

Support.

Updated draft objective: Our communities (pg20)

W1 support the wording and intent of this spatial objective, in particular the emphasis on the role of villages as well as towns. However, the extent to which the draft policies will realise this in practice has yet to be affirmed.

Support.

Updated draft objective: Town centres (pg21)

W1 support the wording and intent of this spatial objective.

Support.

Updated draft objective: Built, Historic and Natural Environment (pg22)

W1 support the wording and intent of this spatial objective.

Support.

Updated draft objective: Ecology and Biodiversity (pg22)

W1 support the wording and intent of this spatial objective.

Support.

Updated draft objective: Health, wellbeing and recreation (pg23)

W1 support the wording and intent of this spatial objective.

Support.

Updated draft objective: Design (pg24)

W1 support the wording and intent of this spatial objective.

Support.

Updated draft objective: Housing (pg25)

W1 support the wording and intent of this spatial objective.

Support.

Updated draft objective: Economy, prosperity and skills (pg25)

W1 support the wording and intent of this spatial objective.

Support.

Updated draft objective: Transport and movement (pg26)

W1 support the wording and intent of this spatial objective.

Support.

3 SPATIAL STRATEGY

Para 3.10-3.11 Spatial options

W1 welcome the thorough exploration and testing of spatial options. W1 endorse the proposed spatial option of '*... supporting regeneration of Andover and Romsey Town Centres, supporting growth at key employment areas along with supporting growth at our larger urban and rural communities.*' Furthermore, W1 endorse the principle of '*Enabling growth at a larger number of settlements ...*'. W1 would respectfully suggest that appropriate mechanisms be put in place, which may justify further allocations in the TVLP2040 in some instances, whilst deferring to Neighbourhood Plans and Village Design Statements in others.

Conditional support.

Recommended amendment: Subject to further consideration of proposed options / allocations.

Reason: see proposed amendments to draft policies later in this response.

Para 3.14-3.15 Proposed spatial strategy (pg31)

W1 note that the spatial strategy identifies a wider distribution of development than set out in the current Local Plan 2016. It is noted that much of the Borough is rural with some villages meeting immediate needs. It is TVBC's intention that the draft strategy will support these rural communities allowing them to grow in a sustainable manner through enabling rural communities to deliver their own needs and priorities. W1 are pleased to see greater emphasis placed on a 'tailored' approach to enabling rural communities to address the specific challenges they face in terms of housing supply and affordability. However, the extent to which the duty to co-operate has been realised in practice has yet to be affirmed.

Conditional support.

Recommended amendment: Subject to further consideration of proposed options / allocations.

Reason: see proposed amendments to draft policies later in this response.

Test Valley Sustainable Spatial Strategy and key diagram (pg32)

The intent is supported, however, the treatment of the main towns Andover and Romsey as discrete settlements with no reference to their immediate hinterland would seem to be a missed opportunity. Well connected villages such as Abbots Ann (identified as a tier 3

settlement) enjoy a range of services and exhibit a degree of containment, whilst proximity to the main towns (in this case Andover) afford existing and future resident's convenient access to higher order shops, services, employment and leisure opportunities.

The role of this intermediary tier should be recognised and in W1's opinion, should be encompassed within the list of tier 2 settlements. This is endorsed to some degree by paragraph 5.4 of the Settlement Hierarchy topic paper which affirms that it is appropriate to consider '*... accessibility to facilities and services in large neighbouring urban areas, such as Andover, Southampton, Eastleigh and Chandler's Ford*' and para. 3.36 of the TVLP2040 provides an example.

Ludgershall had a population of 5,390 according to the 2021 census, but the combined Wiltshire and TVBC proposed allocations could add another 6,500 occupants. W1 question whether this can be classed as a sustainable growth in a location that is relatively remote and in a town that lacks rail links. More fundamentally, paragraph 4.103 of the TVLP2040 indicates that both the Wiltshire south east Empress Way site and the TVBC south east of Ludgershall site require a road bridge over a railway used by the MOD, which is a substantive piece of infrastructure requiring negotiation with a wide range of stakeholders (including Hampshire County Council, Network Rail, Wiltshire Council and the MOD). With respect to the preferred growth scenario (S1), W1 consider that reliance upon development at Ludgershall (specifically 1,500 homes across two sites), located across the boundary in Wiltshire is unwise. The allocations should be discounted unless there is clear evidence that there is a realistic prospect of the infrastructure being viably delivered. In any event, this option doesn't present the most sustainable option.

Object.

Recommended amendment: Show Abbotts Ann as a tier 2 settlement on the key diagram.

Reasoning: Insufficient weight has been given to Abbotts Ann's functional relationship with Andover - see sections above and below for further detail.

Settlement hierarchy and assessment (pg34)

W1 acknowledge that the criteria for assessing a settlements position in the hierarchy has been refined following feedback from Reg18 stage 1 (para 1.5 of the Settlement Hierarchy topic paper). Abbotts Ann performed well against the criteria set out in the Reg18 stage 1 Plan, possessing all six of the 'key facilities' and benefitting from public transport.

- Food Store, such as a village shop.
- Outdoor sports facility, such as a playground or sports pitch

- Village or Community Hall
- Primary School
- Public house or Social club
- Place of Worship

W1 is pleased to see reference made to the importance of broadband and electric car infrastructure (para 3.9 of the Settlement Hierarchy topic paper).

W1 recognise that the methodology has been updated in light of consultation comments and the publication of the draft Local Transport Plan 4 (para 4.1 and table 2 of the Settlement Hierarchy topic paper). As a result, the list of 'key facilities' has been reduced to four (as listed below) and all of which are present in Abbots Ann:

- Primary School;
- Food Store such as a village shop;
- Outdoor sports facility, such as a playground or sports pitch;
- Community facility including Village or Community Hall, Public house or Social club, Place of Worship.



Above: Photos highlighting some of the local facilities in Abbots Ann

Tiers 3 and 4 have also been merged.

As previously referenced, paragraph 5.4 of the Settlement Hierarchy topic paper explains that it is appropriate to attribute added weight to those settlements that are well placed to take advantage of higher order facilities in neighbouring settlements, North Baddesley being one such example. Having regard to the overall scores set out in Table 7 of the Settlement Hierarchy topic paper, Abbots Ann would appear to be comparable to Charlton and better than Chilworth, both of which are tier 2 settlements. Whilst some other tier 3 settlements do possess a broader range of 'other facilities' none are as proximate to a tier 1 settlement.

As recognised at paragraph 3.23 of the TVLP, the ranking of each settlement in the hierarchy does not indicate the presence or otherwise of suitable land for development, nor that it would be environmentally appropriate. However, in the case of the c.3.25ha site adjoining Abbots Ann (ref: 300 in the SHELAA) its classification in the hierarchy would appear the sole point of contention with opportunities and constraints capable of being designed in / out.

It is evident that the terms 'rural areas' and 'countryside' are not interchangeable in the TVLP2040 – W1 suspect that this is likely to prove confusing for many readers.

Settlement boundaries (pg36)

W1 support the identification of settlement boundaries for tier 1-3 settlements.

Spatial strategy policy 1 (SS1) Settlement Hierarchy

Object.

Recommended amendment: Show Abbots Ann as a tier 2 settlement in Policy 1 (SS1).

Reasoning: Insufficient weight has been given to Abbots Ann's functional relationship with Andover, in addition to the fact that it possesses all four key facilities and benefits from 'other facilities' - see sections above for further detail. In the interest of ensuring that the TVLP2040 is justified and effective.

Notwithstanding the above the scale of development set out for tier 3 settlements would not, in W1's opinion, be sufficient to 'enable' growth. Consideration should be given to strategic allocations commensurate with the size of the settlement particularly where these would (i) enhance the range of facilities on offer and (ii) are well connected to the main towns or neighbouring urban areas, so as to provide convenient access to higher order shops, services, employment and leisure opportunities.

Recommended amendment: Introduce 'select strategic allocations' where these would (i) enhance the range of facilities on offer and (ii) are well connected to the main towns or neighbouring urban areas to the scale of development for tier 3 in Policy 1 (SS1).

Furthermore show Abbots Ann as a tier 2 settlement on Figure 3.1 Settlement hierarchy map.

Reasoning: Insufficient weight has been given to Abbots Ann's functional relationship with Andover - see sections above for further detail. As set out in the text above in the interest of ensuring the TVLP2040 is positively prepared and effective.

Development in the Countryside (pg40)

W1 support para 3.47 insofar as it recognises that settlement boundaries may need to be set aside or enlarged to allow for community led development.

Spatial strategy Policy 2 (SS2) Development in the Countryside (pg40)

If allocations are not forthcoming in the rural area, consideration should be given to introducing an additional criteria (c), that allows for a reservations policy, facilitating the release of additional land adjoining tier 1-3 settlements in the event that the housing trajectory isn't being met.

Conditional support.

Recommended amendment: Introduce additional criteria in Policy 2 (SS2) to facilitate the release of additional land adjoining tier 1-3 settlements in the event that the housing trajectory isn't being met.

Reasoning: As set out in the text above and to ensure timely delivery and meet identified housing needs.

Meeting our housing needs (pg41)

TVBC's excellent track record of housing delivery is duly acknowledged.

Housing Need (pg41)

The slight increase in the advisory housing need figure from 541 homes at Reg18 Stage 1 to 550 homes at Reg18 Stage 2 is acknowledged. W1 fully supports TVBC's approach in applying the standard method as a minimum housing requirement. However, W1 remain concerned that the planned level of growth is unambitious and does not:

- Reflect low affordability as identified in the evidence base (SHMA 2022).
- Unmet need arising from neighbouring authorities, as flagged by the PfSH SPS for the southern HMA.

These matters will need to be fully considered and accommodated where practical in order for the plan to be sound pursuant to paragraph 35 of the NPPF.

Unmet Housing Needs (pg42)

W1 welcome the SPS produced by PFSH and recognise the challenges around this issue.

Pressures are particularly acute in the Southern HMA. Despite the relatively recent adoption of the New Forest District Local Plan, the capped housing requirement and stepped trajectory, suggest that the current shortfall in supply is only likely to worsen. Many of the adjoining areas also fall within the catchment of international nature conservation sites that are threatened by recreational pressures or nutrient loading. Whilst solutions are being brought forward, this adds a degree of complexity and may in some instances push back the delivery of prospective development sites.

W1 also note that Ludgershall is a focus for growth in the emerging Wiltshire Local Plan and will facilitate a new road access to the town from the east, which is still being co-ordinated with neighbouring local authorities (such as TVBC). The emerging Wiltshire Local Plan also states that any future need to further expand the town into Test Valley will be the subject of review in future development plans, which indicates the proposed allocations in the TVLP2040 have not yet been fully considered or accounted for.

For the reasons outlined above, W1 is concerned that the TVLP2040 has not been positively prepared, nor is it consistent with the NPPF. Further consideration is needed pursuant to paragraphs 61-022 of National Planning Practice Guidance.

Housing market areas (pg43-45)

W1 welcome the proposed realignment of the two Housing Market Areas [“HMA”] and consider the proposed delineation along the route of the A30 sensible (para 3.67 of the TVLP2040).

W1 support the proposal to continue to apportion growth based on the amount of population (para 3.68 of the TVLP2040) to be sensible, particularly given the equal distribution of tier 1 settlements, although there are notably fewer tier 2 settlements in the northern HMA. This will see 57% of the housing requirement being made in the northern Test Valley HMA (para 3.69 of the TVLP2040).

Spatial Strategy Policy 3 (SS3): Housing Requirement (pg45)

W1 support proposed Policy 3 (SS3) including the minimum housing requirement of 11,000 homes over the plan period 2020-2040 (equivalent to 550 per annum), 6,270 of which are to be delivered in the northern HMA (equivalent to 313 homes per annum). The minimum figures are premised on updated demographics and affordability ratios (relative to the

Reg18 Stage 1 consultation), but concern is expressed that the SHMA is out of date and in need of a refresh ahead of Reg19.

Whilst the Southern and Northern HMA totals tally in table 3.1, the homes per annum for each of the HMA's do not.

Conditional support.

Recommended amendment: Refresh SHMA and review annual figures in table 3.1.

Reasoning: In the interest of accuracy.

Spatial Strategy Policy 4 (SS4): Rural Housing Requirement (pg47)

The rural housing requirement is set at 542 homes (equivalent to around 5% of the Borough requirement), 260 of which are to come forward in the for the northern HMA. Having raised concerns about the developability of currently tabled allocations, it would be prudent to ascribe a higher requirement to the rural area. W1 does not consider that it would be appropriate to rely upon the delivery of housing in the rural area that have not been specifically identified in TVLP2040. Rural sites that benefit from key services and connectivity to tier 1 settlements should be allocated through consultation with local communities to ensure that they are deliverable and that the plan is effective and justified in accordance with paragraphs 23 and 69 of the NPPF.

Conditional support.

Recommended amendment: Propose allocations within the rural area.

Reasoning: To ensure that the TVLP2040 is sound.

Policy 5 (SS5): Neighbourhood Development Plan Housing Requirements (pg49)

W1 are disappointed that TVBC has not ascribed a minimum housing requirement to each and every Parish, instead electing to provide a minimum housing requirement only when a Neighbourhood Plan area is designated or a review commenced. This introduces a level of uncertainty, which in W1's opinion, would justify strategic allocations in the instances set out in relation to draft Policy 1 (SS1). Please see associated recommendations.

Holding objection

Recommended amendment: Look at needs of rural area in more detail and make allocations in / adjoining tier 3 settlements where appropriate.

Reasoning: To ensure that the TVLP2040 is sound and that the aim of enabling rural communities to thrive is realised.

Community tools (pg50)

W1 welcome the suite of tools being deployed to increase support and awareness of the options available in bringing forward community led schemes.

Housing supply (pg50-51)

W1 note that the TVLP2040 housing supply (as set out in table 3.3) provides for 110% of the identified requirement – providing a degree of surety. Such contingency is pragmatic, particularly given that no attrition rate has been applied to housing commitments in the tier 1 and 2 settlements, nor the rural area. However, W1 is concerned that the level of housing proposed in the rural area would not fulfil the ambition to enable rural communities to thrive, nor does this provide a sufficient uplift to meaningfully address affordable housing needs.

Policy 6 (SS6): Meeting the Housing Requirement

W1 strongly support the proposal to build-in a contingency of 10% above the housing requirement, which will help provide a sufficient supply of homes and maintain a resilient housing land supply across the plan period.

The policy proposes ten strategic allocations, five in the northern HMA and five in the southern HMA. Three of the proposed strategic allocations fall within the sphere of Andover. With the possible exception of land south of London Road, East Andover none of the strategic allocations in the northern HMA cater to SME housebuilders [in the spirit of para 70 of the NPPF] W1 is concerned that reliance on such a limited number of large-scale allocations fails to reflect the desired 'tailored' approach to enabling housing in the rural areas, as conveyed at paras 3.14-3.15 of the TVLP2040, and in the case of developments around Ludgershall is predicated on assumptions about the feasibility of infrastructure delivery.

Object.

Recommended amendment: Update table 3.3 and Policy 6 (SS6) to include 60 homes on land east of Duck Street, Abbots Ann [see SHLAA ref: 300 and illustrative masterplan forming appendix [B] of this response].

Reasoning: The inclusion of the site east of Duck Street would result in an uplift in housing supply, at a scale that supports SME housebuilders and affordable housing delivery, whilst ensuring that homes are delivered in a sustainable location. As set out in relation to policy 1 (SS1), Abbots Ann possesses a good range of key services and other services, whilst offering convenient access to higher order facilities in Andover, including to employment opportunities at Land Forces HQ and Andover Business Park as well as those at Thruxton (supported through the draft allocation under Policies 9 and 10 (NA9 / NA10). Development in this location would fortify the viability of local facilities and provide complementary facilities such as a community car park (aiding school drop-offs / pick-ups), EV charging, play facilities, trim trail and pavilion / coffee kiosk. For further information see illustrative Masterplan at appendix [B] of this consultation response).



Meeting our economic needs (pg53)

W1 note that significant growth has taken place at Andover Business Park and concur that this is a positive indicator of *'confidence in the local economy'* (para 3.106 of the TVLP2040). W1 concur with the observed trend towards flexible working including increased working from home, self-employed, smaller businesses.

Future employment needs (pg53)

W1 notes that the initial PfSH Employment, Economic and Commercial Needs Study (2021) findings for Test Valley have been refined through a further analysis study (2022). W1 consider it appropriate to factor in the considerations set out at para 3.111. W1 concur with the delineation of northern and southern FEMA.

Spatial Strategy Policy 7 (SS7): Employment Land Requirement (pg55)

W1 support the minimum employment land requirement of 71.7ha, with a minimum of 31.3 in the northern FEMA, to be delivered over the plan period 2020-2040.

Support.

Employment land supply (pg56)

W1 consider that over allocation is essential in order to allow for a choice and range of sites (be it size, shape, tenure, cost, links to strategic road network, proximity to workforce or other characteristics) to meet the needs of local businesses looking to expand or consolidate, as well as inward investment (as alluded to in para 3.119 of the TVLP2040). Table 3.5 points to a meagre residual supply in the northern FEMA, again supporting the case for choice and range.

Conditional support.

Recommended amendment: Consider additional employment / mixed-use allocations to bolster supply.

Reasoning: Explained in paragraph above.

Spatial Strategy Policy 8 (SS8): Meeting Employment Land Requirement (pg57)

W1 note that Andover Airfield Business Park is identified as a Strategic Employment Site. This is proximate to Abbots Ann, being within easy cycling distance 2km and accessible via Red Post Lane and Pioneer Road.

Conditional support.

Recommended amendment: Consider additional employment / mixed-use allocations to bolster supply.

Reasoning: Explained in paragraph above.

Delivery, contingency and monitoring (pg58)

W1 welcome whole plan viability testing and do not dispute the findings; specifically, that the requirement for 40% affordable housing is achievable. W1 applaud the fact that the views of the development industry have been sought during the formative stages of the Plan.

Monitoring and contingency (pg58)

W1 support the identification of contingency measures (under para 3.132 of the TVLP2040), in particular to review the SHELAA to see if there are any additional sites that could come

forward. W1 contend that the land east of Duck Street, Abbots Ann should be allocated through the Local Plan, but failing that it would be appropriate to identify the land as a reserve site.

Spatial Strategy Policy 9 (SS9): Delivery, Monitoring and Contingency (pg59)

Support.

W1 welcome the inclusion of a delivery, monitoring and contingency policy.

4 TEST VALLEY COMMUNITIES

Housing site assessment (pg62)

W1 object to stage 4 of the site selection process, in so far as *'all sites in the rural area have been excluded from the Local Plan site selection process'*. The text at para 4.6 goes on to explain that these sites will help inform our rural communities in considering proposed housing allocations. However, there is no guarantee that those communities will elect to bring forward a Neighbourhood Plan. The TVLP2040 fails to draw distinction between well performing tier 3 settlements (particularly those well connected to the main towns), which still fall within the rural areas, and countryside. It is evident that the terms 'rural areas' and 'countryside' are not interchangeable – W1 suspect that this is likely to prove confusing for many readers. W1 is concerned that reliance on a limited number of strategic large-scale allocations fails to reflect the desired 'tailored' approach to enabling housing in the rural areas, as conveyed at paras 3.14-3.15 of the TVLP2040. As set out in relation to the spatial strategy and key diagram, W1 is concerned about the feasibility of sites in Ludgershall that are dependent on a new bridge across a rail line used by the MOD.

In order to support W1's call for the allocation of land east of Duck Street Abbots Ann, it has been assessed against the criteria set out in the sustainability appraisal – see Appendix [D] of this consultation response. It is evident that the site performs well.

Northern Test Valley (pg63)

With respect to figure 4.1 it is evident that the majority of growth around Andover is focussed on the northern and eastern edge of the existing built-up area. In W1's opinion an allocation at Abbots Ann, which sits to the south west would complement the proposed distribution. Andover Business Park and Land Forces HQ already sit to the south of the A303, negating severance issues and ensuring excellent connectivity to employment opportunities.

Land south east of Ludgershall (pg82)

Ludgershall had a population of 5,390 according to the 2021 census, but the combined Wiltshire and TVBC proposed allocations could add another 6,500 occupants. W1 question whether this can be classed as a sustainable growth in a location that is relatively remote and in a town that lacks rail links.

More fundamentally, paragraph 4.103 of the TVLP2040 indicates that both the Wiltshire south east Empress Way site and the TVBC south east of Ludgershall site require a road bridge over a railway used by the MOD, which is a substantive piece of infrastructure requiring negotiation with a wide range of stakeholders (including Hampshire County Council, Network Rail, Wiltshire Council and the MOD). With respect to the preferred growth scenario (S1), W1 consider that reliance upon development at Ludgershall (specifically 1,500 homes across two sites), located across the boundary in Wiltshire is unwise. The allocations should be discounted unless there is clear evidence that there is a realistic prospect of the infrastructure being viably delivered. In any event, this option is not considered sustainable.

Northern Area Policy 8 (NA8): Land to the south east of Ludgershall (pg83)

Object.

Recommended amendment: Delete proposed allocation and draft policy.

Reasoning: Explained in paragraph above.

Northern Area Policy 9 (NA9): south of Thruxton aerodrome (pg86)

W1 support the identification of the land south of Thruxton aerodrome for business activities related to aviation, motor sport or the motor industry.

Support.

Northern Area Policy 10 (NA10): Thruxton aerodrome (pg88)

W1 support the identification of Thruxton aerodrome for business activities related to aviation, motor sport or the motor industry.

Support.

4 THEME BASED POLICIES

Climate change (pg126)

W1 welcomes the introduction and description of the national context as a prelude to the locally derived Climate Emergency Action Plan, adopted in 2020. The holistic approach described at para 5.13 of the TVLP2020 is supported.

Delivering a net zero carbon future (pg128)

W1 support in principle the delivery of a net zero carbon future and addressing the impacts of our changing climate through both mitigation and adaptation.

Climate change is one of the defining challenges of our time. We are committed to reducing emissions through the setting of Science-Based Targets (SBTs) and we will play a full and active role within the industry to drive innovation around carbon reduction.

The focus upon the energy hierarchy at figure 5.1 is therefore supported.

Policy CL1: Countering Climate Change (pg131)

W1 support the principles enshrined therein, which reflect the duties placed upon TVBC through the Climate Change Act 2008 and the ambitions of the Climate Emergency Action Plan.

Support.

Flood risk (pg131)

W1 recognise that flood risk is an important component in directing development, managing the form of development and the incorporation of resilience measures.

Policy CL2: Flood Risk (pg134)

W1 support the principles enshrined therein which are consistent with National Planning Policy. The encouragement given to the enhancement of the water environment and guidance on buffers (with allowance for departure where justified) is considered sensible.

Support.

Sustainable buildings and energy use (pg135)

W1 is committed to ensure the business plays its role in delivering carbon reductions and planning for a sustainable future. W1 is aware of the leading housebuilders work with the Carbon Trust, including that of Bellway Homes, to set two science-based targets for reducing combustion of fuel and operation of facilities and electricity purchased for our own use (Scope 1 and 2). CO2e by 46% by July 2030 and purchased goods and services, capital goods, upstream waste and transportation, waste generated in operations, business travel and employee commuting etc. (Scope 3) CO2e by 55% by July 2030.

Bellway Homes are targeting 100% electricity purchase to be REGO certified by December 2024 (FY23 78.4% achieved), successfully trialled Google Smart Home Technology which will now be fitted as standard in all new 2021 part L building regulations homes, aim to build

20% of our homes in timber frame by 2024 to reduce embodied carbon, built and sold four net zero exemplar plots at Callerton, Newcastle-upon-tyne, and switched to HVO Green Diesel biofuel for site fuel (679,442 litres used in FY23 saving over 1,700 tonnes of carbon).

Through collaboration and test trials, work is being undertaken on a variety of technologies to help reduce carbon emissions from homes. This includes working with Salford University on the Energy House 2.0 project testing new technology and Future Homes Standard conditions with real occupants.

W1 are supportive of the transition away from gas boilers and the fabric standard outlined in the Future Homes Standard consultation. We are committed to the FHS, we are not supportive of meeting standards that exceed the FHS / Part L1 2025.

The energy, carbon & renewable generation standards proposed in draft policy CL3 however are far more than where the Future Homes Standard is taking the industry.

The Planning - Local Energy Efficiency Standards Update WMS by Lee Rowley MoS for Housing made on 13 December 2023 clarifies how this matter should be addressed:

“There has been a long-standing debate within planning about both the best method and body to set energy efficiency and environmental standards. For a number of years, the plans of some local authorities have sought to go further than national standards in terms of such efficiency for newbuild properties.

Equally, there is a legitimate consideration for the Government to want to strike the best balance between making progress on improving the efficiency and performance of homes whilst still wanting to ensure housing is built in sufficient numbers to support those who wish to own or rent their own home.

In 2015, in reference to an uncommenced provision in the Deregulation Act 2015 which amended the Planning and Energy Act 2008, a written ministerial statement (WMS) (HC Deb, 25 March 2015, vol 584, cols 131- 138WS) stated that until that amendment was commenced, local plan policies exceeding minimum energy efficiency standards should not go beyond level 4 of the Code for Sustainable Homes. Since then, the introduction of the 2021 Part L uplift to the Building Regulations set national minimum energy efficiency standards that are higher than those referenced in the 2015 WMS rendering it effectively moot. A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build netzero ready homes.

The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future.

In this context, the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations.

The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale.

Any planning policies that propose local energy efficiency standards for buildings that go beyond current or planned buildings regulation should be rejected at examination if they do not have a well-reasoned and robustly costed rationale that ensures:

- *That development remains viable, and the impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework.*
- *The additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).'*

It is further noted from the WMS that any increase on Part L required by local authorities should be expressed as an uplift to the Target Emission Rate, which these are not.

Embodied carbon, the carbon emissions generated from the production and transportation of building materials, construction process and maintenance of a building is currently beyond the scope of the Building Regulations. The government is proposing to take steps to address this factor and intends to consult on its approach to measuring and reducing embodied carbon in new buildings in due course.

Policy CL3: Sustainable buildings and energy use (pg137)

Object.

Recommended amendment: W1 appreciates that Local Plans are future facing due to their timeframes. It is therefore suggested that draft policy CL3 be re-worded to allow for potential change in government policy over time (or will be subject to future LP review) but that in the interim current expectations are aligned to the FHS and WMS.

Reasoning: Explained in paragraphs above.

Water use and management (pg138)

W1 are pleased to see detailed introduction to the issues, and evolving legislative framework and indeed more localised initiatives which will ensure that the TVLP2040 is accessible to a

wide audience. Furthermore, it stands testament to the innovation shown by the housebuilding sector in adapting to meet the challenge.

Policy CL4: Water use and management (pg140)

Criteria (a) exceeds the current minimum 110L/person/day 'optional' requirement of Part G of the Building Regulations but on the basis that there is water stress relating the River Anton, W1 express no objection.

W1 consider that housebuilders can achieve this level of consumption.

Support.

Delivering Infrastructure (pg146)

W1 support reference to physical, green and social infrastructure and concur that all three are essential in supporting thriving sustainable communities.

Policy COM1: Delivering Infrastructure (pg149)

W1 consider the policy to be little more than a statement of good practice but has no objection.

Support.

Community services and facilities (pg149)

W1 consider a policy that resists the unjustified loss of key services, particularly local shops and public houses, to be appropriate. The criteria set out therein is welcomed. The opportunity to incorporate new services and facilities, either community led or delivered as part of a mixed-use development does however appear to have been overlooked.

Policy COM2: Community services and facilities (pg150)

With respect to W1's promotion of land east of Duck Street in Abbots Ann, there is a clear opportunity to bring forward complementary services and infrastructure, such as play facilities, coffee bar / pavilion, trim trails, parking (multifunctional but to alleviate pressure at school pick up / drop off times), standalone EV charging facilities.

Conditional support.

Recommended amendment: Encourage new community facilities and services, extending beyond shops and public houses, through an additional permissive component to the policy.

Reasoning: Explained in paragraphs above.

Protect and enhance the landscape character of the Borough (pg164)

W1 welcome the explanatory text.

Policy ENV3: Landscape character (pg166)

W1 support the intent, but express concern as to the interpretation of criteria (c). Important local landscape features would appear open to judgement, but the absolute nature of 'loss' seems to jar with the preceding criteria (b). Under some circumstances the public benefits of a scheme may well justify on-site mitigation or compensatory measures, but this isn't made clear in draft policy ENV3 and it would seem in-appropriate to cascade to material considerations given that many forms of development are likely to result in the partial loss of trees, walls, hedges and / or green spaces.

Conditional support.

Recommended amendment: Either omit or revisit criteria (b).

Reasoning: Explained in paragraphs above.

Local Gaps (pg167)

W1 welcome the explanatory text and have no objection to the identification of local gaps where these are necessary to protect the distinct identity of historic settlements.

Policy ENV4: Local gaps (pg168)

W1 raise no objection to the identification of a local gap between Andover and Abbots Ann, as shown on inset maps 1, 7 and 11.

Support.

Ecology and biodiversity (pg174)

W1 welcome the introductory text that will ensure that the plan is accessible to a broad audience. Reference at para 5.227 to the emerging Hampshire LNRS is supported and it may well prove appropriate to identify opportunities for biodiversity enhancement on the proposals map in due course. Figure 5.3 is helpful in setting out the approach to avoidance, mitigation and compensation in unambiguous terms.

Policy BIO1: Conservation and enhancement of Biodiversity and geological interest (pg177)

W1 support the draft policy as drafted but would respectfully suggest that the opportunity is seized to introduce a permissive element that actively encourages proposals for biodiversity enhancement, particularly where this bolsters or creates habitat corridors, and access to

nature. This is very much a prelude to the LNRS, but also embraces some of the initiatives being pioneered through Landscape Recovery Schemes.

W1 consider the footnotes to criteria (iv) and (v) helpful as Priority habitats and species listed in National and Local Biodiversity Action Plans, as well as habitats and species of principal importance are perhaps less visible to the untrained eye. It is respectfully suggested that hyperlinks to the Hampshire Biodiversity Action Plan and any associated mapping be inserted to assist the reader.

With respect to W1's promotion of land east of Duck Street in Abbots Ann, there are clear opportunities to bolster and supplement the boundary planting, with only marginal detriment through the loss of a field in intensive agricultural use.

Conditional support.

Recommended amendment: Introduce a permissive element relating to proposals specifically aimed at biodiversity enhancement and access to nature.

Reasoning: Explained in paragraphs above.

International Nature Conservation Designations (pg178)

W1 welcome the introductory text that will ensure that TVLP2040 is accessible to a broad audience.

With respect to W1's promotion land east of Duck Street in Abbots Ann, this would avoid direct effects on such designations and would be designed to mitigate, alone or in combination effects through on site mitigation measures or if there are residual effects a combination of on and off-site measures. It is noteworthy that the site lies beyond both the River Itchen and River Avon SPA catchment areas; albeit within the Solent SPA with its well established mitigation measures.

Policy BIO2: International nature conservation designations (pg180)

W1 support draft policy BIO2 as drafted which is clear and concise.

Support.

Biodiversity Net Gain (pg181)

W1 welcome the introductory text that will ensure that TVLP2040 is accessible to a broad audience.

Support.

Policy BIO3: Biodiversity Net Gain (pg182)

No objection to draft policy BIO3 as it would appear consistent with National Planning Policy.

With respect to W1's promotion land east of Duck Street in Abbots Ann, we are confident that the proposals would deliver at least a 10% measurable gain.

Support.

Green Infrastructure (pg182)

W1 consider the introductory text helpful and applaud the implied link to the emerging Hampshire LNRS at para 5.264.

Policy BIO4: Green Infrastructure (pg183)

No objection to draft policy BIO4 as drafted as it would appear consistent with National Planning Policy.

With respect to W1's promotion land east of Duck Street in Abbots Ann, we are confident that the proposals would safeguard and fortify existing green infrastructure.

Support.

Trees and Hedgerows (pg184)

W1 consider the introductory text helpful and welcome the cross-reference to street trees, as encouraged in the NPPF. However, the requirement for street-tree provision to be integrated in new developments does not 'jump out' in the draft policy itself. The commitment to a Tree Strategy at para 5.268 of the TVLP2040 is welcome.

Policy BIO5: Trees and Hedgerows (pg185)

W1 consider there to be some duplication with earlier 'BIO' policies and respectfully suggest that there is scope for consolidation. For instance, BIO5(b) appears to duplicate BIO1 (vi). This is not to belittle the importance of safeguarding ancient woodland and veteran trees, but simply make the plan shorter and easier to read.

Conditional support.

Recommended amendment: Avoid duplication with preceding policies and bolster reference to Street Trees and focus on wider climate change benefits and amenity value.

Reasoning: Explained in paragraphs above.

Health, wellbeing and recreation (pg186)

W1 consider the introductory text helpful and are pleased to see emphasis afforded to health and wellbeing. The guidance around ongoing management / ownership of open space.

Policy HE1: Open space and recreation (pg188)

Criteria (a) sets out clear concise guidance on the quantitative provision and measurement, as well as clear expectations as to the level of detail / specification (criteria b), and ongoing management and maintenance (criteria c).

With respect to W1's promotion of land east of Duck Street in Abbots Ann, we are confident that we can meet the prescribed quantitative requirements. Qualitative aspirations include a landscape-led design approach and open space integrated with the development and, subject to suitable flexibility. This is exemplified in the illustrative masterplan set out at appendix [B]. This also shows how plays space, trim trail and access to nature can be incorporated pursuant to the health and wellbeing of future occupant and existing residents.

Conditional support.

Existing open space (pg189)

W1 consider the introductory text helpful and support the intent.

Policy HE2: Existing open space (pg189)

No objection.

Access to the countryside (pg190)

W1 consider the introductory text helpful and support the intent.

Policy HE2: Access to the countryside (pg191)

W1 recognise the significant health and wellbeing benefits that accrue from access to nature and the wider countryside. W1 endorse the approach being taken by the Council.

With respect to W1's promotion of land east of Duck Street in Abbots Ann, it is noteworthy that a new footpath has



been dedicated along the south-eastern edge of the village. Not only does this provide an attractive link between the north eastern part of the village historic core (via the church) to the new school on the southern edge but it affords access to nature and the countryside. The mainstay of the path sits c.1m below the level of the site and is separated by an established landscaped buffer of some 2-5m deep. As shown on the illustrative masterplan in appendix [B] there are opportunities for further connections, aiding permeability without disturbing the quintessential qualities of the adjoining countryside.

Support.

Design (pg191)

W1 consider the introductory text helpful and welcome the focus of 'place making principles', which is consistent with the NPPF and National Design Guidance. W1 view good design as an iterative process and fully support the need to articulate the design rationale, be it within preapplication correspondence, as part of community engagement or within design and access statement's accompanying planning applications. Paragraph 5.310 is fully supported. W1 commend reference to the importance of public realm and creating adaptable, durable and resilient spaces, including through the integration of infrastructure that can yield multiple benefits (e.g. SUDs features).

Policy DES1: Delivery of sustainable and high-quality design (pg194)

W1 endorse the approach to sustainable and high-quality design being taken by TVBC.

With respect to W1's promotion of land east of Duck Street in Abbots Ann, the illustrative masterplan at appendix [B] embodies the intent and wording of draft policy DES1.

Support.

Design (pg191)

W1 consider the introductory text helpful and welcome the focus of 'place making principles', which is consistent with the NPPF and National Design Guidance. W1 view good design as an iterative process and fully support the need to articulate the design rationale, be it within preapplication correspondence, as part of community engagement or within design and access statement's accompanying planning applications. Paragraph 5.310 is fully supported. W1 commend reference to the importance of public realm and creating adaptable, durable and resilient spaces, including through the integration of infrastructure that can yield multiple benefits (e.g. SUDs features).

Policy DES1: Delivery of sustainable and High-Quality Design (pg194)

W1 endorse the approach being taken by TVBC.

With respect to W1's promotion of land east of Duck Street in Abbots Ann, the illustrative masterplan at appendix [B] embodies the intent and wording of draft policy DES1.

Support.

Design considerations (pg195)

W1 welcome the additional tier of detail within this section.

Policy DES1: Design details and considerations (pg197)

No objection.

With respect to W1's promotion of land east of Duck Street in Abbots Ann, we are confident that detailed design considerations can be satisfied.

Support.

Housing (pg200)

W1 welcome the introductory text which will help ensure that the TVLP2040 is accessible to a broad audience. The emphasis on affordability and the need to bring forward a range of products and tenures to provide opportunities for households to access housing. The explanation and worked example at para 5.363 as in our experience there are frequently misconceptions as to how this works in practice. W1 are pleased to see a map (figure A) showing the designated rural areas, as the definition requires cross-referencing of other legislation and is far from accessible. The map provides welcome clarity.

Policy HOU1: Affordable housing (pg203)

No objection.

With respect to W1's promotion of land east of Duck Street in Abbots Ann, the site lies within a designated rural area and the provision of 40% affordable housing is achievable.

Support.

Community led development (pg205)

W1 welcome the explicit support afforded to community led development, albeit would respectfully suggest that TVBC should not be reliant on it, owing to the fact that not all communities / Parish Council's will have the capacity, willingness and / or motivation to take this forward (noting that it often requires significant volunteer time). There is an important enabling role here for TVBC, both in terms of education and support, but also in seeking to streamline processes to ensure that the hurdles are less onerous.

Policy HOU3: Rural exception affordable housing (pg203)

Given the very limited geographic areas and shape (some being linear) of some of the parishes (as aptly demonstrated in figure A of the TVLP2040) it is respectfully suggested that Parishes are not an appropriate basis for assessing unmet needs. They are administrative areas and often do not reflect the functional reality or perception of where people live / have a local connection to. It can also distort, sustainability considerations, as villages possessing key services should form the starting point for site selection.

To address this, W1 respectfully suggest that needs be considered on the basis of individual parishes, but 'host parish and immediately adjoining parishes within designated rural areas'. Whilst this is not perfect it is considered more realistic. Reference to a proportion of market housing being acceptable to the extent that this renders a scheme viable and deliverable is supported. In practice, we have found that such an approach can release rural exception sites that might not otherwise have come forward.

Object.

Recommended amendment: Replace 'Parish' with 'host parish and immediately adjoining parishes within designated rural areas' in criteria (a).

Reasoning: Explained in paragraphs above.

First Homes exception affordable housing (pg210)

W1 welcome the inclusion of a specific draft policy on this often-overlooked planning tool. However, concern is expressed in respect of the restrictions placed upon its use in Test Valley.

Policy HOU4: First Homes exception affordable housing (pg211)

Object.

Recommended amendment: In W1's opinion there is a good case to depart from National Policy and allow this policy tool to be used in the Designated Rural Area, having particular regard to its extent (as aptly demonstrated in figure A of the TVLP2040) and the fact that the majority of the undesignated area either already hosts development or is subject to proposed strategic-scale allocations.

Reasoning: Explained in paragraphs above.

Provision of housing to meet our needs (pg211)

W1 endorse the approach.

Policy HOU5: Provision of housing to meet our needs (pg212)

With respect to W1's promotion of land east of Duck Street in Abbots Ann, the proposed development as shown on the illustrative masterplan in appendix [B] is capable of satisfying the requirements of draft policy HOU5.

Support.

Residential amenity standards (pg213)

W1 endorse the approach to NDSS and optional building regulation standards Part M4(2) and M4(a) and (b).

Policy HOU6: Residential amenity standards (pg213)

With respect to W1's promotion of land east of Duck Street in Abbots Ann, the proposed development as shown on the illustrative masterplan in appendix [B] is capable of satisfying the requirements of draft policy HOU6.

Support.

Self-build and custom build housing (pg214)

It is unclear if TVBC considered this in the site viability assessment?

Policy HOU7: Self build and custom build housing (pg214)

With respect to W1's promotion of land east of Duck Street in Abbots Ann, it is noteworthy that the scale of development envisaged falls below the threshold of 100 dwellings in the draft policy.

Conditional support subject to viability assessment.

Economy employment and skills (pg224)

W1 welcome the introductory text which will ensure that the TVLP2040 is accessible to a broad audience.

Policy EC1: Retention of employment land and strategic employment sites (pg225)

The draft policy would appear sensible and consistent with national planning guidance, given our understanding of the high take up rate of sites.

With respect to W1's promotion of land east of Duck Street in Abbots Ann, it is noteworthy that it enjoys very good connections to the established employment area to the east and southeast of Andover.

Support.

Skills and training (pg229)

W1 welcome the introductory text which will ensure that the TVLP2040 is accessible to a broad audience. W1 is conversant with and supportive of the E&S Planning process. W1's parent company, Bellway Homes, is an Employer of Choice one of the company's key performance indicators is to increase the percentage of its work force in an 'earn and learn' role. As of FY23 8.3% of the Bellway workforce were in that role and we have retained our 5% Club, gold membership for FY23. This commitment extends to new apprenticeships and graduate entry.

Policy EC5: Skills and training (pg230)

With respect to W1's promotion of land east of Duck Street in Abbots Ann, we would be pleased to support and achieve CITB objectives.

Support.

Sustainable transport and movement (pg231)

W1 welcome the introductory text which will ensure that the TVLP2040 is accessible to a broad audience. W1 support the focus on active travel.

Policy TR1: Active and sustainable travel (pg233)

With respect to W1's promotion of land east of Duck Street in Abbots Ann, we are confident that the criteria set out in draft policy TR1 can be satisfied. Paragraph 2.13 of the transport technical note forming appendix [C] of this submission sets out distances to the nearest local facilities with the 2km walking and 5km cycling isochrone's forming appendices B and C of the note demonstrating accessibility by means other than the private car. This is further evidenced in the sections titled 'travel distances' (para2.16 onwards), Walk and cycle accessibility (para 2.23 onwards). The dedication of a new footpath linking the village centre and school, described in relation to draft policy HE2 will also serve to bolster permeability on foot to local facilities and the countryside.

Public transport is discussed at para 2.33 onwards. This affirms that stops supporting both north and south bound services (including a shelter for the former) are positioned in close proximity to the site.

Support.

Assessing transport impacts (pg233)

W1 welcome the introductory text which will ensure that the TVLP2040 is accessible to a broad audience. W1 endorse the approach therein.

Policy TR2: Assessing transport impacts (pg234)

W1 welcome, in particular, the reference to the need for the '*... timely and phased delivery of infrastructure to serve the development*' (criteria C). Explicit encouragement could however be given to new standalone EV charging facilities, particularly as part of mixed-use developments.

With respect to W1's promotion of land east of Duck Street in Abbots Ann, we are confident that the criteria set out in draft Policy TR2 can be satisfied and it is noteworthy that there is scope to include standalone EV charging facilities as part of the proposal. Section 4 of the transport technical note, forming appendix [C] of this submission, explains the likely effects of development traffic and concludes: Given the limited effect of development traffic on Duck Street, and the very low impact on the A343, the development would have an acceptable impact on the safety and operation of surrounding roads, and therefore accords with paragraph 114 of the NPPF.

Conditional support.

Recommended amendment: Explicit encouragement for standalone EV charging points.

Reasoning: Explained in paragraphs above.

Parking standards (pg235)

W1 welcome the introductory text which will ensure that the TVLP2040 is accessible to a broad audience. W1 endorse the approach therein. Encouragement could however be given to new standalone EV charging facilities, particularly as part of mixed-use developments.

Policy TR3: Parking (pg236)

With respect to W1's promotion of land east of Duck Street in Abbots Ann, we are confident that the parking standards can be satisfied – see illustrative masterplan at appendix [B].

Conditional support.

Recommended amendment: Explicit encouragement for standalone EV charging points.

Reasoning: Explained in paragraphs above.



I trust that the information set out above assist the TVBC in arriving as a plan which meets the tests of soundness. W1 would welcome the opportunity to discuss the above comments and recommendations with you.

Yours sincerely



Brett Spiller MRTPI MCIWM BTP BA (Hons)

Director

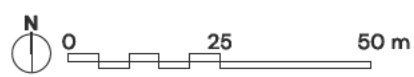
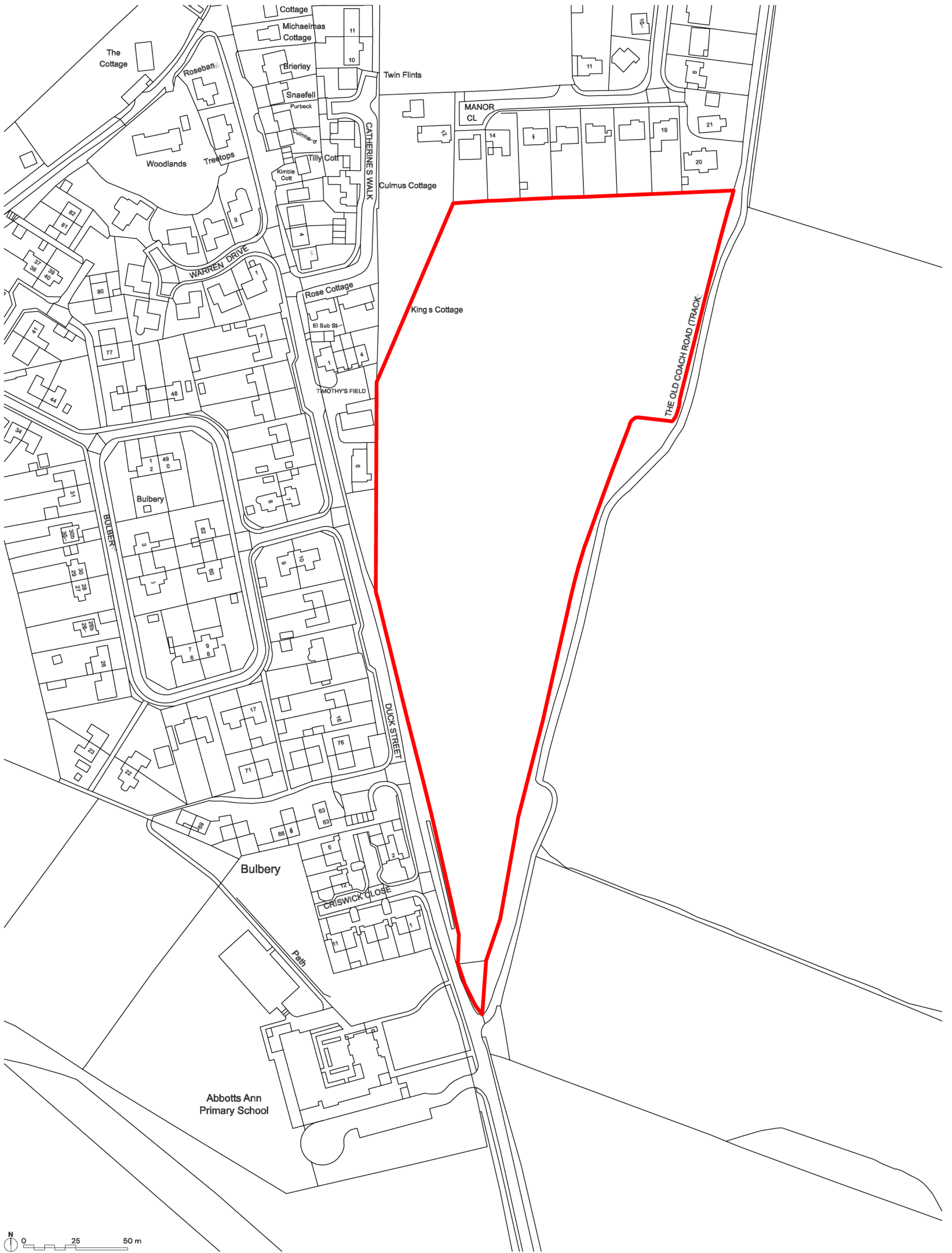
Chapman Lily Planning Limited

APPENDIX [A]

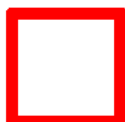
APPENDIX [B]

APPENDIX [C]

APPENDIX [D]



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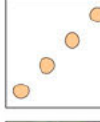

SITE BOUNDARY (3.34HA)

BULBERY FIELD, ABBOTTS ANN – SITE LOCATION PLAN





KEY

-  SITE BOUNDARY (3.34HA)
-  POTENTIAL VEHICULAR ACCESS
-  POTENTIAL PEDESTRIAN ACCESS POINTS
-  EXISTING PUBLIC RIGHT OF WAY
-  POTENTIAL NEW PEDESTRIAN ROUTES
-  INDICATIVE DRAINAGE ATTENUATION FEATURES
-  EXISTING VEGETATION
-  INDICATIVE NEW PLANTING
-  POTENTIAL LOCATION FOR PLAY FACILITY
-  POTENTIAL PLAY/FITNESS TRAIL FACILITIES
-  POTENTIAL LOCATION FOR CAFE/COFFEE KIOSK
-  POTENTIAL LOCATION FOR COMMUNITY CAR PARK
-  POTENTIAL FOR BUNGALOWS ALONG NORTHERN EDGE
-  POTENTIAL BUFFER ZONE ALONG NORTHERN EDGE TO ALLOW FOR ACCESS FROM EXISTING DWELLINGS
-  EXISTING BUS STOP
-  PUBLIC HOUSE
-  POST OFFICE AND VILLAGE SHOP
-  CHURCH

N.B. ALL ELEMENTS ARE SHOWN FOR ILLUSTRATIVE PURPOSES, AND ARE THEREFORE SUBJECT TO FUTURE DETAIL, SHOULD THE SITE BE TAKEN FORWARD.



BULBERY FIELD, ABBOTTS ANN – INDICATIVE MASTERPLAN FRAMEWORK (PLUS CONTEXT)



Bulbery Field, Abbots Ann

Access Note

Woolsington One Limited

Prepared by:

SLR Consulting Limited

[Redacted]
[Redacted]

SLR Project No.: 422.064952.00001

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Revision: V1

Basis of Report

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Table of Contents

1.0	Introduction	1
2.0	Existing Conditions.....	2
3.0	Development Proposals.....	11
4.0	Likely Effects of Development Traffic	12
5.0	Planning Policy.....	14
6.0	Summary and Conclusions	17

Appendices

Appendix A – Site Layout

Appendix B – Walking Isochrone

Appendix C – Cycling Isochrone

Appendix D – Public Transport Isochrone

Appendix E – Site Access



1.0 Introduction

- 1.1 SLR has been commissioned by Woolsington One Limited to provide highways and transport advice in relation to promotion of Bulbery Field, Duck Street, Abbots Ann for residential development of up to 60 new homes within the emerging Test Valley Borough Council Local Plan. The proposed site layout is attached at **Appendix A**.
- 1.2 The site is greenfield land located on Duck Street, toward the southern end of the village of Abbots Ann, around 365m north of the junction of Duck Street / A343 Salisbury Road. It is within the administrative boundaries of Hampshire County Council (HCC) which is the Local Highway Authority (LHA) and Test Valley Borough Council (TVBC) which is the Local Planning Authority (LPA).

Planning History

- 1.3 The site was previously the subject of an outline planning application (15/01634/OUTN) for the erection of 70 dwellings with associated public space and access.
- 1.4 The refusal notice for that application cited (Reason for Refusal 1) the accessibility of the site by public transport and, in the Council's view at the time, the reliance of potential residents on the private car for access to essential services. The reason for refusal states that these concerns would have resulted in an unacceptable increase in the number and length of car journeys within the area, to the detriment of the environment and the locality.
- 1.5 There were a number of other Reasons for Refusal which were unrelated to transport / accessibility / highways matters. In the main, these Reasons for Refusal related to the absence of a legal agreement at the time of determination.
- 1.6 The Officer Report notes (5.7) that TVBC, acting on behalf of Hampshire County Council Highways, raised no objection to the proposed development subject to the provision of a £211,000 Planning Obligation relating to the improvement of the St Johns Crossroads and a future sustainable travel link into Andover.
- 1.7 Paragraph 5.8 of the Officer Report notes the comments of the TVBC Transport Planning team, on behalf of the County Council, including:
- Potential car reliance, given the distance from Andover, albeit it was noted that commuting may be possible for general cyclists, and that commuters to the rail station would be those most likely to cycle.
 - Village facilities which '*could provide for essentials*' in day to day life.
 - Consistent with Highways' comments, a desired improvement to routes to/from Andover for pedestrians and cyclists – either via the A343 to the south, or north via Cattle Lane.
- 1.8 The Officer Report goes on to state (8.33) that the Highway Officer '*has raised no objection to the layout or form of the proposed access*' which comprised a 5.5m carriageway and 2.0m footway on the eastern side of Duck Street. The approved geometry of that access is carried forward as part of the current masterplan.



2.0 Existing Conditions

Site Location

- 2.1 The site is located on Duck Street, as shown at **Figure 3.1**. To the north are residential properties, with open fields to the east and south, and Duck Street and further residential properties to the west.



Figure 2.1: Site Location

Local Highway Network

Duck Street

- 2.2 Duck Street is a two-way single carriageway road running in a north-south alignment through the village. Footway is present on the western side of the road, providing a continuous link along the site frontage and onward to the school (south) and village centre (north).
- 2.3 Duck Street has a 30mph speed limit, with traffic calming (build-outs) to the south near to the Primary School.
- 2.4 Several offline parking bays are provided on the western side of the road. Bus stops in the vicinity of the site have flags and / or shelters.



Old Coach Road

- 2.5 An unmade informal track known as the Old Coach Road, is located along the site's eastern boundary. Access to Old Coach Road is indicated in the site masterplan for sustainable modes of transport.

A343 Salisbury Road

- 2.6 Duck Street meets the A343 at a crossroads junction, with Fullerton Road opposite. Right-turn lanes are provided on the A343 for traffic entering either Duck Street or Fullerton Road.
- 2.7 The A343 has footway provision on its northern side and is subject to a 50mph speed limit.
- 2.8 2.3km to the northeast of the site, the A343 meets the A303(T) at an all-movements grade-separated junction. The A303(T) is a dual carriageway, subject to the national speed limit, forming part of the Strategic Road Network for which National Highways is the Highway Authority.

Traffic Levels

- 2.9 SLR has referred to publicly available traffic data in the Transport Assessment (TA) for the previous planning application at the site. Given that this data was collected in late 2014, we have also obtained further local traffic flow data to assess whether it remains relevant for current assessment purposes.
- 2.10 Annual Average Daily Traffic (AADT) flows for the A343 to the south of Abbots Ann (Department for Transport (DfT) count site 37002) have been assessed for the 20-year period 2003-22 as shown in **Figure 2.2**.

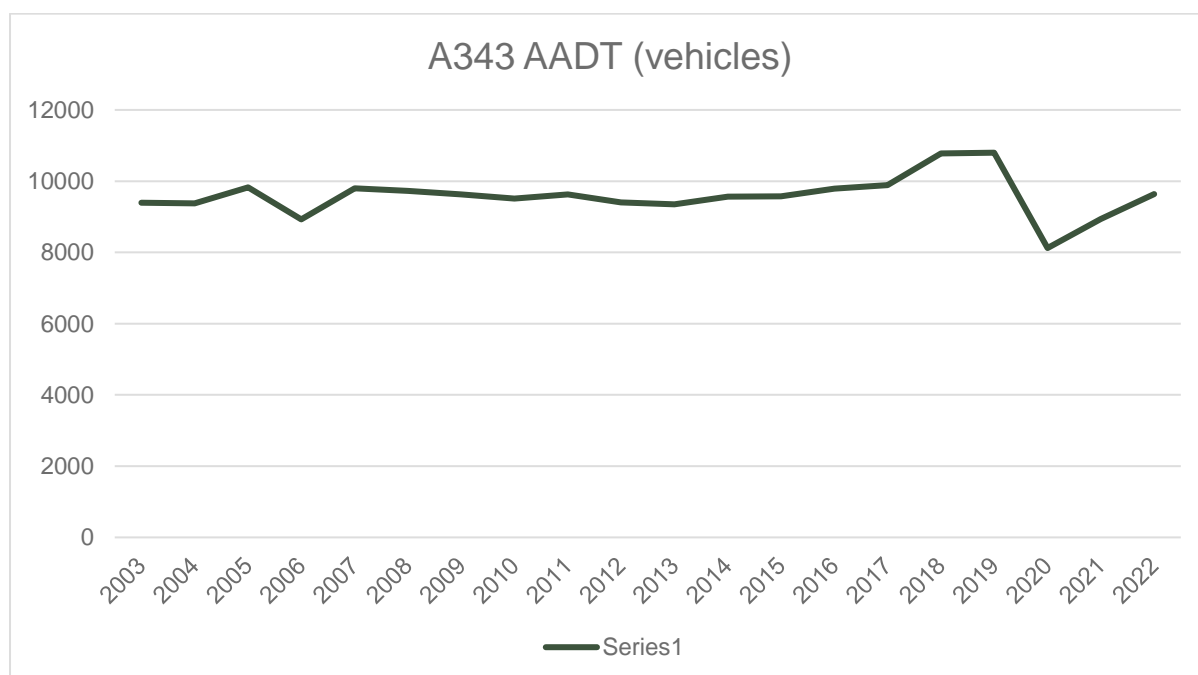


Figure 2.2: Local traffic levels 2003-22



- 2.11 2022 traffic levels were broadly similar to those as far back as 2003. This route has only experienced 2.5% traffic growth in the past 20 years, and there have been reductions in traffic in recent years, reflecting changed travel behaviours following the Covid-19 pandemic.
- 2.12 A343 AADT flows in 2014 were 9,562 vehicles, compared with 9,634 vehicles in 2022 – a 72 vehicle or 0.75% daily increase which is not considered to be material. On this basis, reference to traffic data in the Transport Assessment for the previous application is considered reasonable for the purposes of this Access Note.

Local Facilities

- 2.13 Local services and facilities include:

Bus Stops	On site frontage and 170m north
Primary School	140m
Playing Field	325m
Pub	485m
Church	500m
Village Shop & Post Office	535m
Village Hall	620m
Andover Rail Station	3.9km
ASDA supermarket	3.75km
Andover Town Centre	4.25km

- 2.14 Bi-directional bus stops are adjacent to the site frontage, providing highly-convenient bus access for prospective residents of the site. The village has a range of facilities including educational, recreational and retail premises, all of which are within the 800m '*walkable neighbourhood*' defined in Manual for Streets (MfS).
- 2.15 Most of the above facilities are within the wider 2km walking isochrone (**Appendix B**), and within 5km cycling distance (**Appendix C**) are significant parts of Andover town centre and the rail station. Middle Wallop, Andover, Ludgershall and Winchester are accessible within a 60-minute public transport journey from the site (**Appendix D**).



Travel Distances

2.16 The latest available National Travel Survey (NTS) (2022) indicates that:

- 26% of trips were under 1 mile, and 71% under 5 miles in length.
- 83% of trips under 1 mile were undertaken by walking.
- There have been significant reductions in trip-making over the past 20 years for purposes including shopping (-32%), commuting (-28%), visiting friends (-42%), personal business (-41%) and business (-49%). Alongside this, there has been a small (-4%) reduction in education-related trips. There have been increases in trip making for leisure purposes including 'just walk' and day trips.

Consequently, the requirement for trip-making, particularly shopping, commuting and business trips which are commonly by car, has reduced significantly. This has an important bearing on the relative sustainability of places including more rural locations.

- The average number of shopping trips per person per year was 151 with a total related distance of 570 miles, giving an average shopping trip distance of 3.8 miles per trip.
- The average number of commuting trips per person per year was 119 with a total related distance of 1,008 miles, giving an average commuting distance of 8.5 miles per trip. This is slightly lower than the 9.3 mile national average commuting distance identified in the 2011 Census¹, in which the comparative average commuting distance for Test Valley was 11.1 miles.

2.17 Reference to the 2011 Census² indicates that 16.1% of residents of the area work within the same Middle Layer Super Output Area (MSOA) which includes the western part of Andover. 13.0% of residents work from home, and 7.7% have no fixed place of work. Of those travelling out of the MSOA for work:

- 30.9% work in Andover (2.5 miles)
- 4.0% work in the adjacent MSOA at locations including Thruxton (2.8 miles), Shipton Bellenger (6.2 miles), Amport (1.7 miles), Over Wallop (4.0 miles) and Grateley (3.4 miles)
- 2.2% work in the area of Tidworth (6.5 miles) and Ludgershall (6.3 miles)
- 2.2% are employed in the Barton Stacey area (6.7 miles)

¹ 2011 Census is referenced in this report, given that 2021 Census data was affected by the Covid pandemic (e.g. working from home or furlough).

² Test Valley 005 MSOA.



- The vast majority of the remaining 23.9% are employed across the southeast, with smaller concentrations in locations including Whitchurch, Amesbury, Basingstoke, Winchester, Salisbury and Southampton.

- 2.18 Local residents working within the MSOA, Andover and the nearby settlements listed in 2.17 are all within the 8.5 mile average national commute distance indicated in the NTS – this equates to almost 70% of resident employees that either work from home or within the national average commute distance.
- 2.19 Extending the catchment to the Test Valley average commute of 11.1 miles includes further employment locations such as Porton Down, Amesbury, Whitchurch, Sutton Scotney and the north-western edge of Winchester.
- 2.20 Given that commuting and business travel has reduced significantly since the 2011 Census (paragraph 2.16), it would be expected that a higher percentage of local residents now work from home or locally than indicated above. Nevertheless, even based on 2011 Census data, a significant majority of local residents work well within the national or Test Valley average commuting distances.
- 2.21 In respect of shopping trips, day-to-day requirements are provided for within the village shop (535m from the site) and the nearest supermarket is 3.75km (2.3 miles) which is significantly within the national average distance for shopping trips (3.8 miles), as is the wider retail offer in Andover town centre.
- 2.22 Additionally, local supermarkets including ASDA, Andover, offer home grocery delivery to Abbots Ann, reducing or removing the need to travel for the weekly shop.

Walk and Cycle Accessibility

- 2.23 Reference to the Test Valley Access Plan (TVAP) Supplementary Planning Document (SPD) indicates at paragraph 2.21 that villages including Abbots Ann have facilities which can meet most of their daily needs.
- 2.24 The TVAP goes on to identify a number of access improvement schemes promoted by the council, including works to the St John's Cross junction (pedestrian and vehicle safety), pedestrian infrastructure on the A343 toward Andover, traffic calming near to Abbots Ann school (delivered 2012/13), and wider village traffic calming.

Walking

- 2.25 Village facilities are accessible via Duck Street and the wider network of village streets as described previously.
- 2.26 The site is not crossed by any Public Rights of Way (PRoW) and The Old Coach Road, which runs along its eastern boundary, is not part of the PRoW network. Within the vicinity, a number of Public Footpaths provide recreational links into the countryside and off-highway connections with Little Ann to the northeast.



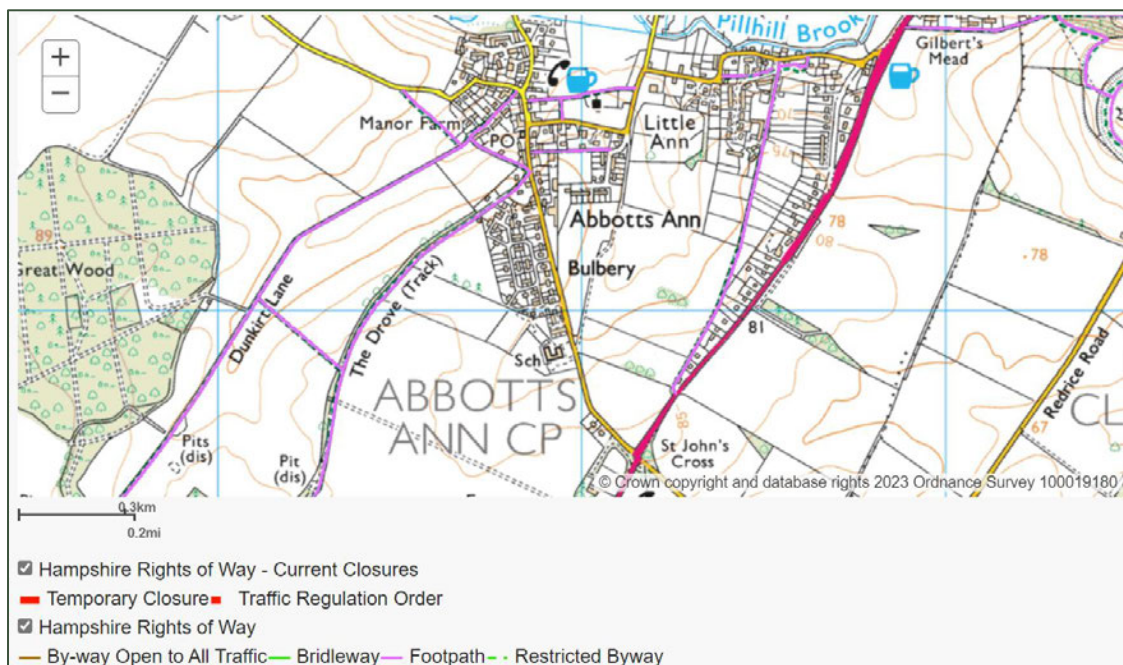


Figure 2.3: Public Rights of Way

- 2.27 SLR has utilised the TRACC accessibility software to assess the site's realistic walking isochrones, as shown in **Appendix B**.
- 2.28 An indication of existing walking patterns can be derived from STRAVA Heatmap data, showing the routes taken by users of the STRAVA mobile app in the vicinity.

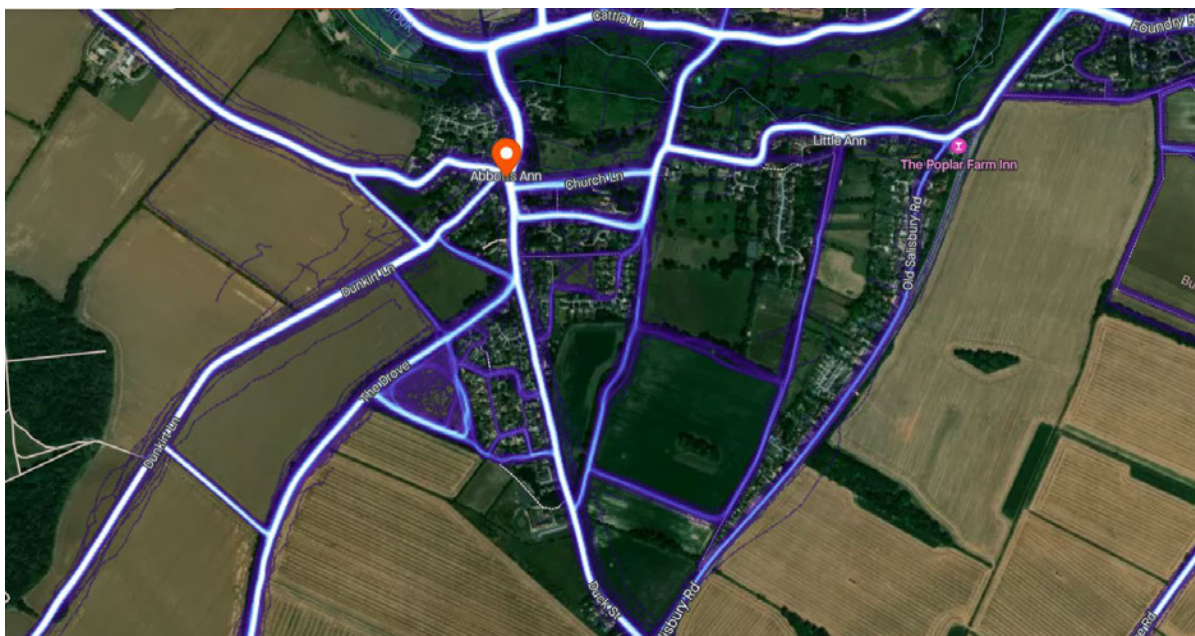


Figure 2.4: STRAVA Heatmap – walking

- 2.29 The heatmap shows significant use of the local walking network around the site and onward towards adjacent settlements.



Cycling

- 2.30 National Cycle Network (NCN) Route 246 (Timsbury - Kintbury via Andover) runs to the east of the site.

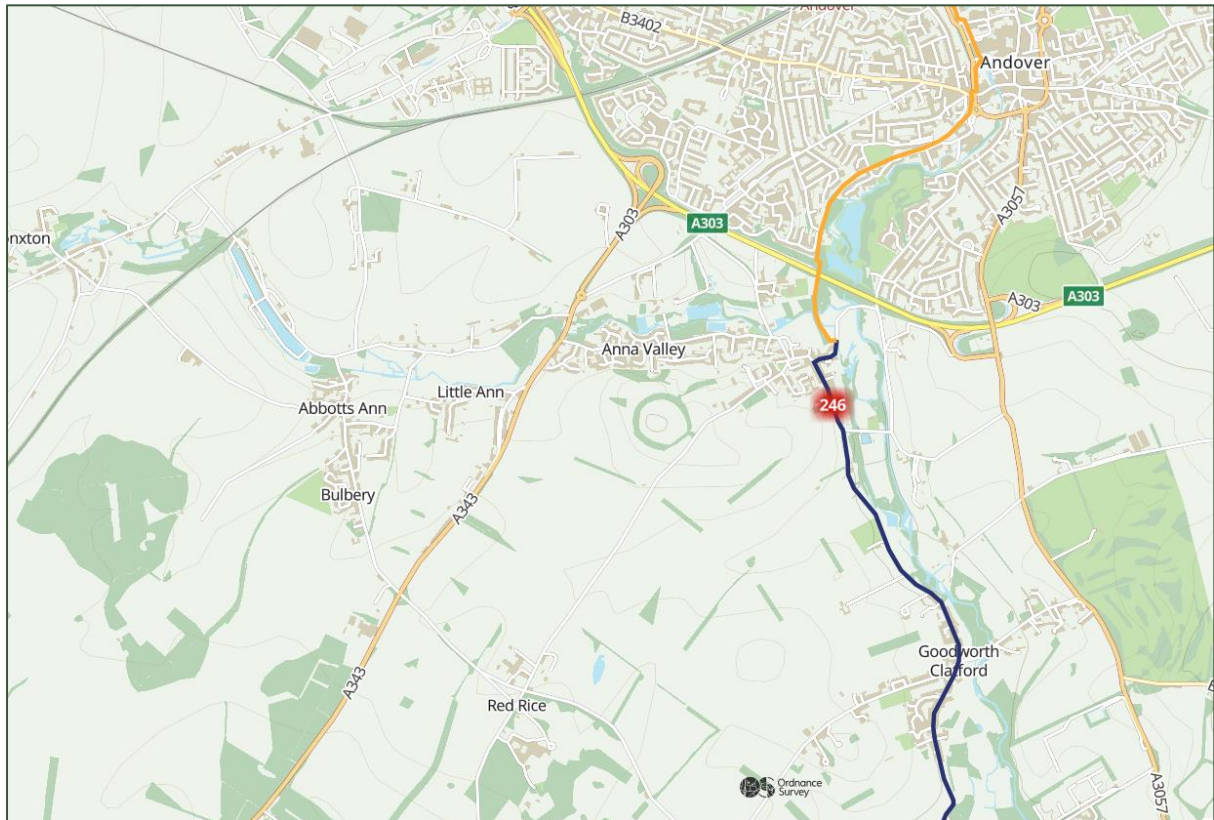


Figure 2.5: National Cycle Network (NCN) Map

- 2.31 STRAVA heatmap data indicates widespread use of formal and informal routes in the vicinity and onward to/from Andover.

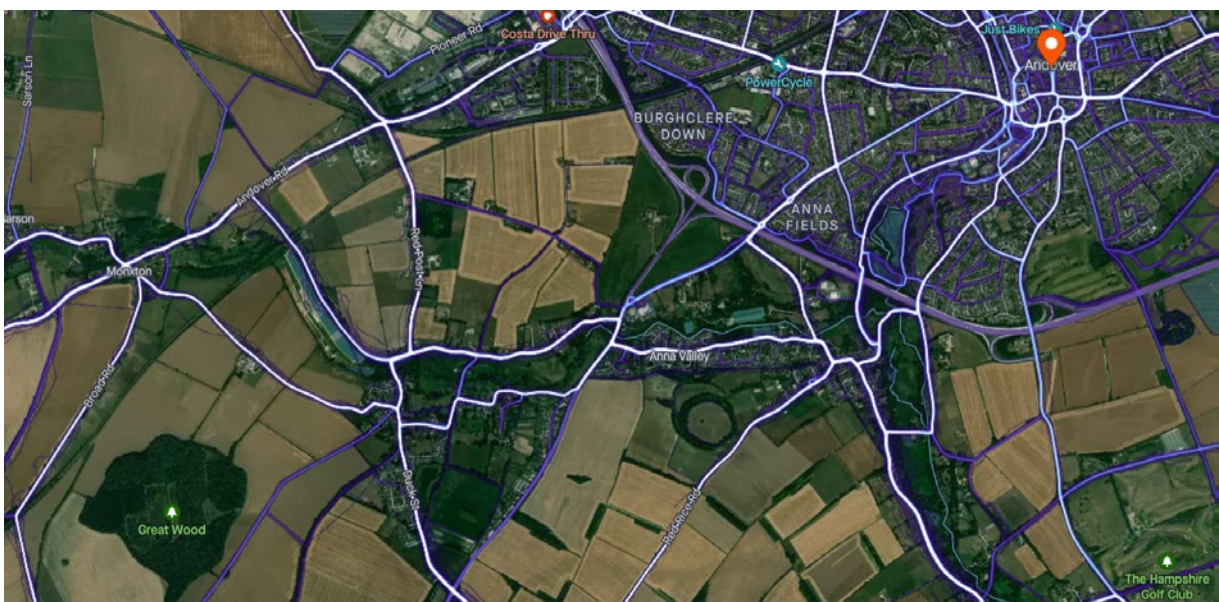


Figure 2.6: STRAVA heatmap - cycling



- 2.32 SLR has utilised the TRACC accessibility software to assess the site's realistic cycling isochrones, as shown in **Appendix C**. This shows a significant cycling catchment for the site, incorporating much of Andover and its town centre.

Public Transport

- 2.33 The nearest public transport stops are on the site's Duck Street frontage. These serve northbound and southbound services including:

Northbound – 17 (Andover – Over Wallop) which provides a service at 0928 (Monday – Friday), 1113 (Monday – Saturday), and additional services on Saturdays at 1413 / 1713.

Southbound – 17 (Andover – Over Wallop) providing a service on Monday – Saturday at 1050, Monday – Friday at 1415, and Saturday at 1350 / 1650.

- 2.34 Other stops in Abbots Ann are served by the 852 (Ludgershall/Andover – Winchester) which provides two afternoon services on Tuesdays, Wednesdays and Fridays.
- 2.35 Public transport (bus or shared transport) services are therefore available to locations including Andover, Middle Wallop, Over Wallop, Eastover and Little Ann during weekdays and on Saturdays.
- 2.36 SLR has utilised the TRACC accessibility software to assess the site's public transport (service bus and rail) isochrones, as shown in **Appendix D**. Given changes in travel behaviour, particularly flexible and at-home working, we have shown the village's public transport accessibility for the weekday morning period (0800-1100) alongside the equivalent PM period (1700-2000). Locations including Andover, Winchester, Over Wallop, Middle Wallop and Ludgershall are accessible within a 60-minute public transport travel time from the site.
- 2.37 Additionally, a village car-sharing scheme operates in Abbots Ann, co-ordinated via a list of potential car sharers in the village shop³.

Personal Injury Collisions

- 2.38 It is recommended in the NPPG (ID42-015) that:

'an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent three-year period, or five-year period in the proposed site has been identified as within a high accident area.'

- 2.39 Personal Injury Collision (PIC) data has been obtained from the Crashmap online search tool for the previous 3-year period (2020-2022) in accordance with guidance set by the NPPG. This is shown at **Figure 2.7**.

³ <https://www.abbotsann.com/amenitiesservices/transport>.



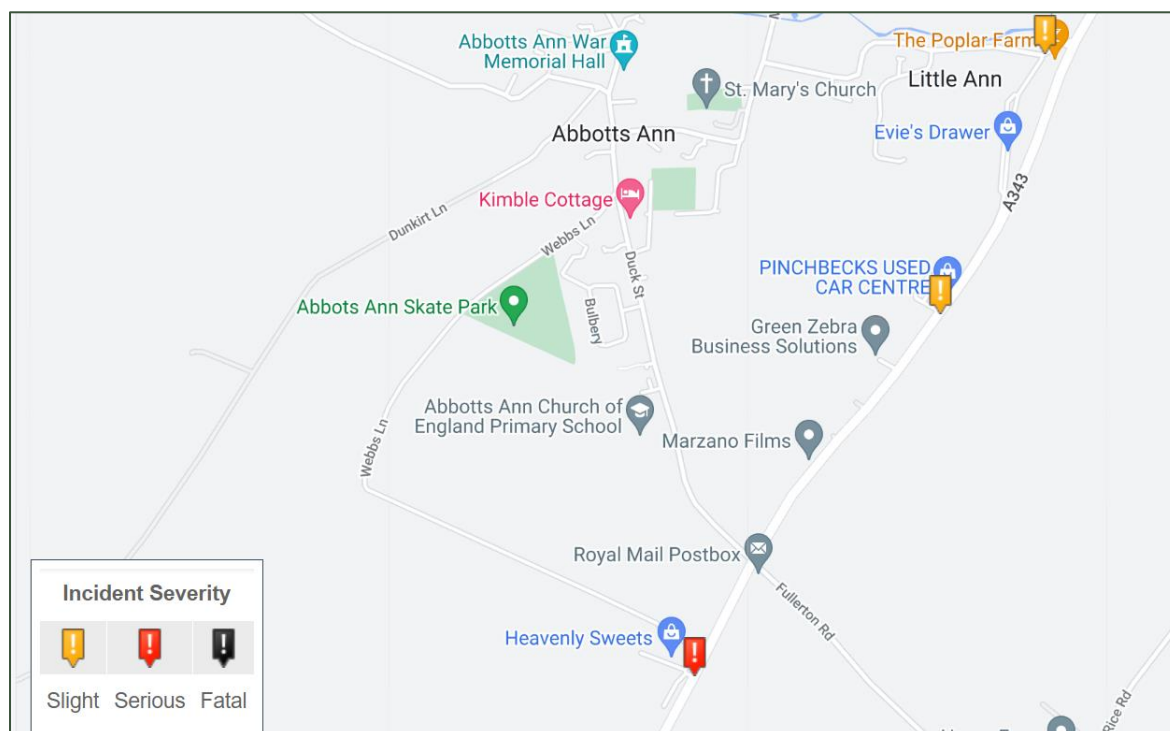


Figure 2.7: Personal Injury Collision Map

- 2.40 No injury collisions have occurred on Duck Street during the last three years for which data is available.
- 2.41 Three collisions have occurred on the A343 – two Slight accidents and one Serious incident.
- 2.42 None of these incidents involved child, cyclist, or pedestrian casualties. Cars were involved in all three collisions, none of which involved bicycles, motorcycles, goods vehicles or public transport vehicles.
- 2.43 There is nothing to suggest that the highway network has an unusual safety record, or that its safety would be materially affected by the proposed development.



3.0 Development Proposals

Context

- 3.1 The proposals concern the development of 60 new houses. As the site currently comprises greenfield land, it will likely generate some limited agricultural traffic; however, it has been assumed for robustness that the site has no existing trip generation.

Vehicular Access Arrangements

- 3.2 The proposals utilise the same access location and geometry (including widths and visibility splays) as were approved by the Highway Authority in relation to the previous planning application (15/01634/OUTN). The proposed access is illustrated in **Appendix E**.
- 3.3 The access arrangement comprises a 5.5m carriageway with 2.0m footways on both sides including around the junction bellmouth, providing a connection onto Duck Street. Tactile paving and dropped kerbs will be provided at crossing points at the site junction.
- 3.4 Again reflecting the previous proposals, a community car park – e.g. for school drop-off/pick-up – is proposed at the southern extent of the site. This car park would also serve the wider community and any additional parking needs associated with the proposed development – for example, visitor parking.
- 3.5 Visibility at the proposed site access would be 2.4m x 46.5m to the north, and 2.4m x 47.3m to the south, reflecting the observed 85th percentile design speeds of 32.28mph northbound and 31.90mph southbound recorded in the Transport Assessment for the previous application.
- 3.6 It is noted that the proposed site access arrangements were subject to a Road Safety Audit (RSA) as part of the previous application, recommendations from which were reflected in the access design as approved by the authorities.

Parking Arrangements

- 3.7 Onsite parking will be provided in line with prevailing Local Planning Authority policy – this is currently set out in Policy T2 of the adopted Local Plan, with emerging parking policy comprising Policy TR3 of the emerging draft Local Plan 2040.
- 3.8 Consistent with the requirements of guidance, parking / storage will be available for bicycles in each of the proposed new homes, and Electric Vehicle (EV) charging facilities will be provided consistent with guidance and Approved Document S of the Building Regulations.

Servicing and Deliveries

- 3.9 The proposed access arrangements have been designed to accommodate regular (e.g. refuse collection) and *ad hoc* (e.g. home moving) vehicle movements, consistent with guidance set out in DfT Manual for Streets.



4.0 Likely Effects of Development Traffic

Trip Generation

- 4.1 The Transport Assessment for the previous application utilised trip rates as follows, which were agreed at the time by the authorities. Subsequent to the earlier application, it is SLR's experience that residential trip rates have typically reduced, reflecting *inter alia* the effects of the Covid pandemic in accelerating and embedding flexible / home working practices.
- 4.2 The previously-approved rates (per dwelling) were:
- AM – 0.166 arrivals / 0.450 departures / 0.616 total
- PM – 0.417 arrivals / 0.224 departures / 0.641 total
- Equating to 49 AM peak hour trips and 51 PM peak hour trips for the previously-proposed 80 dwellings.
- 4.3 Applying these rates to the 60 homes now proposed would result in the following forecast two-way (total) trips:
- 10 arrivals / 27 departures / 37 total vehicle trips in the weekday AM peak hour
 - 25 arrivals / 13 departures / 38 total vehicles in the weekday PM peak hour

Traffic Impact

- 4.4 Based on the previously agreed trip rates, the total trip generation associated with the currently-proposed development equates to one vehicle every 1 minute and 35 seconds in the busiest peak hour.
- 4.5 As noted previously (**Figure 2.1**), there has been no material increase in traffic flows locally within the last 10 years.
- 4.6 The latest available traffic data⁴ indicates that Duck Street carries 153 vehicle movements in total in the AM peak and 116 vehicles in the PM peak. This is well within the capacity of a two-way road such as Duck Street (typically 1,250 vehicles per hour or more⁵) and the addition of development traffic would have no material impact on the safe and efficient operation of the highway.
- 4.7 The A343 carries 1,222 vehicles in the AM peak hour and 1,296 vehicles in the PM peak. Whilst development traffic would be split north-south on Duck Street, even if all of the development trips routed via the A343, this would equate to 3.0% of AM traffic and 2.9% of PM traffic.

⁴ 2014 Base + Committed flows from approved Transport Assessment for application 15/01634/OUTN.

⁵ TA79/99.



- 4.8 The IEMA⁶ document *Environmental Assessment of Traffic and Movement* (July 2023) states:
- 'the day-to-day variation of traffic on a road is frequently at least + or -10%. At a basic level, it should therefore be assumed that projected changes in traffic of less than 10% create no discernible environmental impact'* (paragraph 2.18)
- 4.9 Given the limited effect of development traffic on Duck Street, and the very low impact on the A343, the development would have an acceptable impact on the safety and operation of surrounding roads, and therefore accords with paragraph 114 of the NPPF.
- 4.10 This analysis reflects previous agreements by the authorities in relation to the impact of the earlier planning application, including in terms of the operation of the Duck Street / A343 / Fullerton Road junction.

⁶ Institute of Environmental Management and Assessment.



5.0 Planning Policy

National Planning Policy Framework

5.1 Paragraph 105 of the National Planning Policy Framework (NPPF) requires 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.’

5.2 This note demonstrates that the proposed site is a sustainable location given the choice of transport modes which enable access to day-to-day needs and to employment opportunities. Furthermore, the requirement to travel for these needs has significantly diminished, particularly in recent years, limiting the need to travel consistent with NPPF policy. All of this needs to be considered in the site’s rural context, and this note shows that both retail and commuter trips associated with the site would be shorter than national and local averages.

5.3 NPPF paragraph 110 reinforces the need to allow for the differing transport needs and behaviours of more rural areas, stating *‘...it should be ensured that...appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location’*.

5.4 In this context, NPPF paragraph 111 states that: *‘Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe’*. As demonstrated in this note, consistent with the recommendation of the authorities in relation to previous proposals on this site, there is nothing to suggest that the effect of development traffic would be unacceptable or severe.

5.5 The NPPF goes on to state that developments should prioritise pedestrian and cycle movements *‘within the scheme and with neighbouring areas’* and *‘so far as possible’* in the context of the above, facilitate access to *‘bus or other public transport services’* – recognising the role of service bus and demand-responsive transport provision as available at Abbots Ann.

5.6 More generally, NPPF paragraph 79 promotes development in rural areas *‘where it will enhance or maintain the vitality of rural communities’...‘especially where this will support local services’* as would be the case for the Abbots Ann site. This is reinforced in NPPF paragraph 84 which notes that planning decisions and policies should enable *‘the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship’* – all of which would be supported by the proposed development.

5.7 The Abbots Ann site is well provided-for in terms of local facilities within the village, and also with regard to nearby shopping and employment opportunities, consistent with NPPF paragraph 85 which notes that locations which *‘meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in*



locations that are not well served by public transport'. This recognises that sustainable development in more rural areas can be achieved based on modes of transport other than public transport, notwithstanding the overall public transport accessibility of the Abbots Ann site set out in this report (consistent with NPPF paragraph 105 as previously referenced).

- 5.8 In its Glossary, the NPPF defines sustainable transport modes as: *'Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport'*. Whilst the Abbots Ann site is accessible by a realistic choice of transport modes, including public transport, the NPPF also recognises that car-sharing, ultra-low (e.g. hybrid) and zero-emission vehicles (e.g. Electric Vehicles (EVs)) are all sustainable modes of travel.
- 5.9 This report has noted the existence of a village car-sharing scheme. With regard to vehicle technologies, there are now more than a million battery electric vehicles on the UK's roads, with around 20% of new car registrations being EVs. Projections indicate that virtually all cars on UK roads will be EVs by 2050, with the potential for rapid ramping-up to 39% in 2030 and 84% in 2035⁷. The development will provide charging facilities for EVs from the outset and it is realistic to expect that significant and increasing percentages of vehicles owned by residents would be sustainable modes of transport as defined by the NPPF.
- 5.10 Mindful of access by all modes, including cars, this report has demonstrated that travel distances to retail and employment for potential residents of the site would be well within national and local averages. This has a positive impact on site sustainability, including for car trips, given that most trips from the site would be shorter than average, *'limiting the need to travel'* consistent with NPPF paragraph 105.

Strategic Housing and Economic Land Availability Assessment (SHELAA)

- 5.11 The site is identified as SHELAA (January 2024) reference 300, with the SHELAA noting its adjacency to the village which is identified as a Rural Village in the Local Plan settlement hierarchy.
- 5.12 The site is shown to be deliverable for 60 units, noting that Rural Villages *'do not have the accessibility of larger settlements'*.

Local Plan

- 5.13 As noted above, the adopted Test Valley Local Plan 2011-2029 identifies Abbots Ann as a Rural Village and states that Rural Villages *'provide a range of facilities which support the daily needs of residents'* (2.21) either within the village (as is the case for Abbots Ann) or through travel to nearby settlements.
- 5.14 The emerging Draft Test Valley Local Plan 2040 identifies Abbots Ann as a Tier 3 Settlement. Tier 3 settlements have *"key facilities' to meet the day to day, basic needs of our communities along with the 'good' level of public transport service"* (3.25). At paragraph 3.30, the emerging plan states that four key facilities enable communities to meet their daily needs

⁷ National Grid Future Energy Scenarios 2023.



sustainably, all of which are present in Abbots Ann – primary school, food store (village shop), outdoor sports facilities, community facilities (e.g. hall or pub).

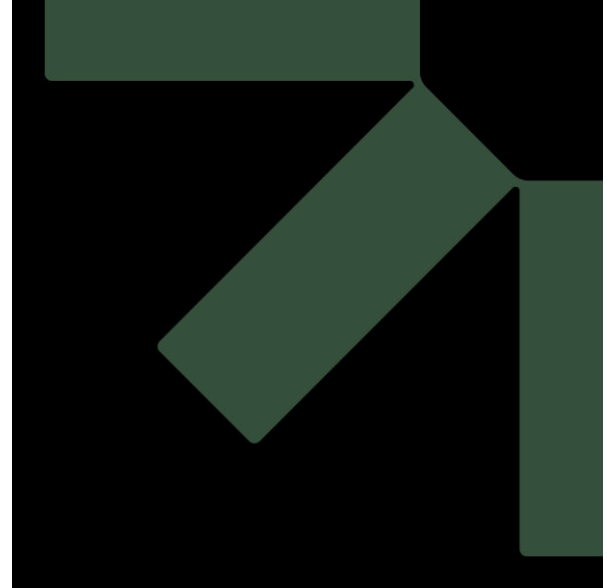


6.0 Summary and Conclusions

- 6.1 The proposed development of 60 homes on Bulbery Field, Abbots Ann has been reviewed by SLR in terms of its accessibility and potential wider transport / highways effects.
- 6.2 The site is accessed from Duck Street which is traffic-calmed, low-speed and provides footway connections into the village centre, to bus stops and to the local school. A wide range of local facilities are available within the village, within walking distance of the site.
- 6.3 A previous planning application (15/01634/OUTN) for the site raised no objection from the authorities with regard to the accessibility of services within the village, nor with regard to the access junction or the effects of development traffic on the local highway network.
- 6.4 Travel distances from the site for access to wider retail opportunities and for commuting to work would be well within national and local averages for such trips. Alongside this, significant proportions of local employees work from home and / or flexibly, and the village is served by grocery and other deliveries from local retailers, further reducing the need to travel.
- 6.5 Evidence demonstrates widespread walking and cycling activity around the site, and walk / cycle catchments which provide access to local services and, in the case of cycling, to Andover town centre.
- 6.6 Public transport provision includes service buses, with the nearest stops adjacent to the site frontage, and shared transport which is co-ordinated within the village. Bus access from the site includes locations such as Andover, Winchester and surrounding settlements. Andover rail station is also accessible by cycling and public transport from the site.
- 6.7 There is no evidence of an adverse safety record on the local network, nor anything to suggest that the limited level of development traffic would materially affect this. Likewise, there has been no material increase in traffic levels in the vicinity for 20 years.
- 6.8 The proposed vehicular access is consistent with the arrangements previously approved by the authorities in relation to earlier proposals for the site. Parking will be provided in line with the requirements of local policy and, in relation to EV charging, the Building Regulations.
- 6.9 Based on previously accepted trip rates, the site would give rise to 37 vehicle trips in the AM peak hour and 38 in the PM peak. Whilst trip rates have declined since these were agreed with the authorities, even this higher level of trip generation would have a *de minimis* effect on the capacity, operation and safety of the surrounding highway network.
- 6.10 The proposals are consistent with policy for more rural settlements set out in the NPPF, evidence in the SHELAA and with adopted / emerging transport and sustainability policy in the Local Plan.
- 6.11 It is concluded that the site is entirely appropriate for allocation in the emerging Local Plan given the transport evidence presented in this note.



Appendix A – Site Layout

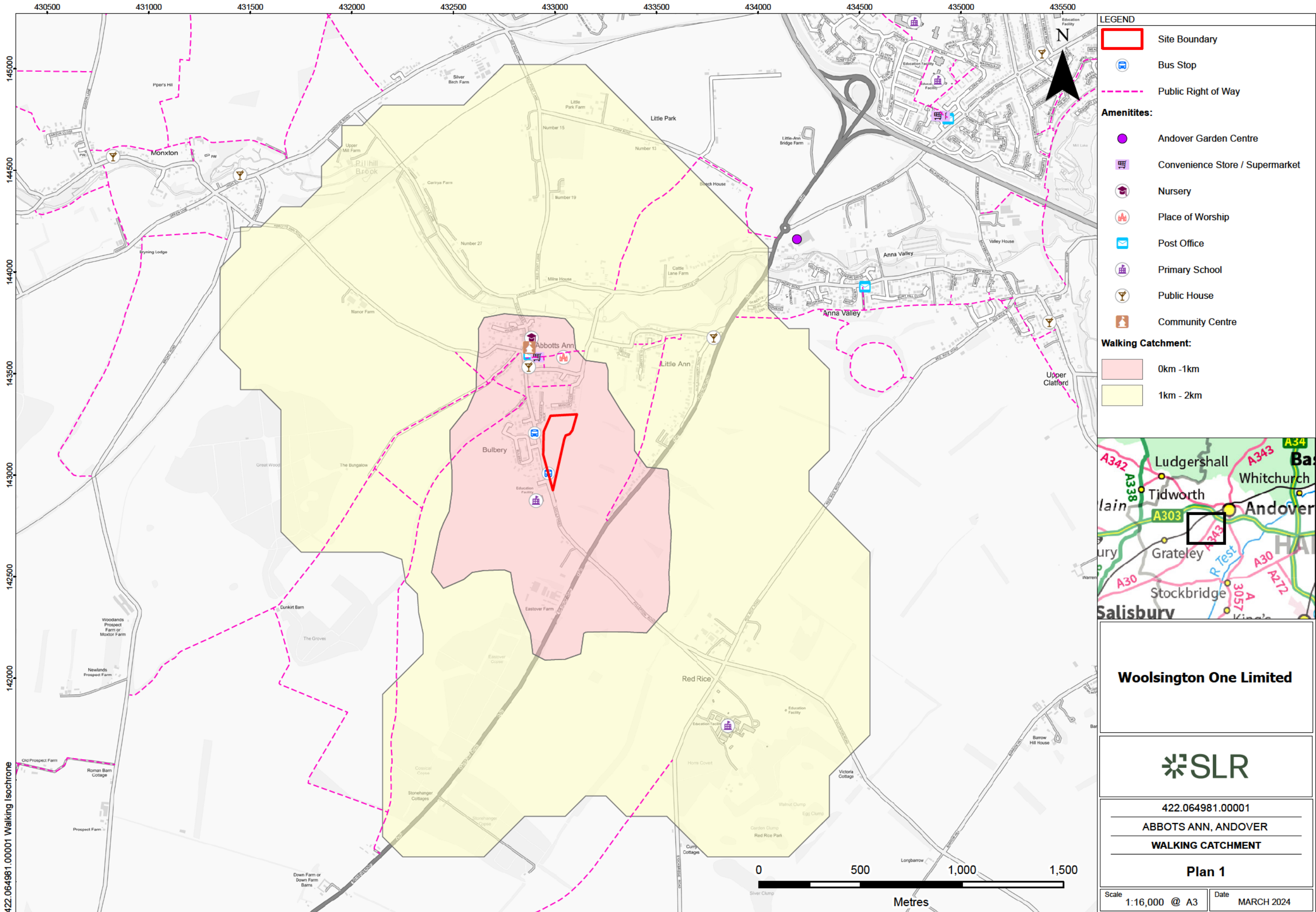




BULBERY FIELD, ABBOTTS ANN - INDICATIVE MASTERPLAN FRAMEWORK



Appendix B – Walking Isoc



LEGEND

Site Boundary

Bus Stop

Public Right of Way

Amenities:

Andover Garden Centre

Convenience Store / Supermarket

Nursery

Place of Worship

Post Office

Primary School

Public House

Community Centre

Walking Catchment:

0km - 1km

1km - 2km



Woolsington One Limited

422.064981.00001

ABBOTS ANN, ANDOVER

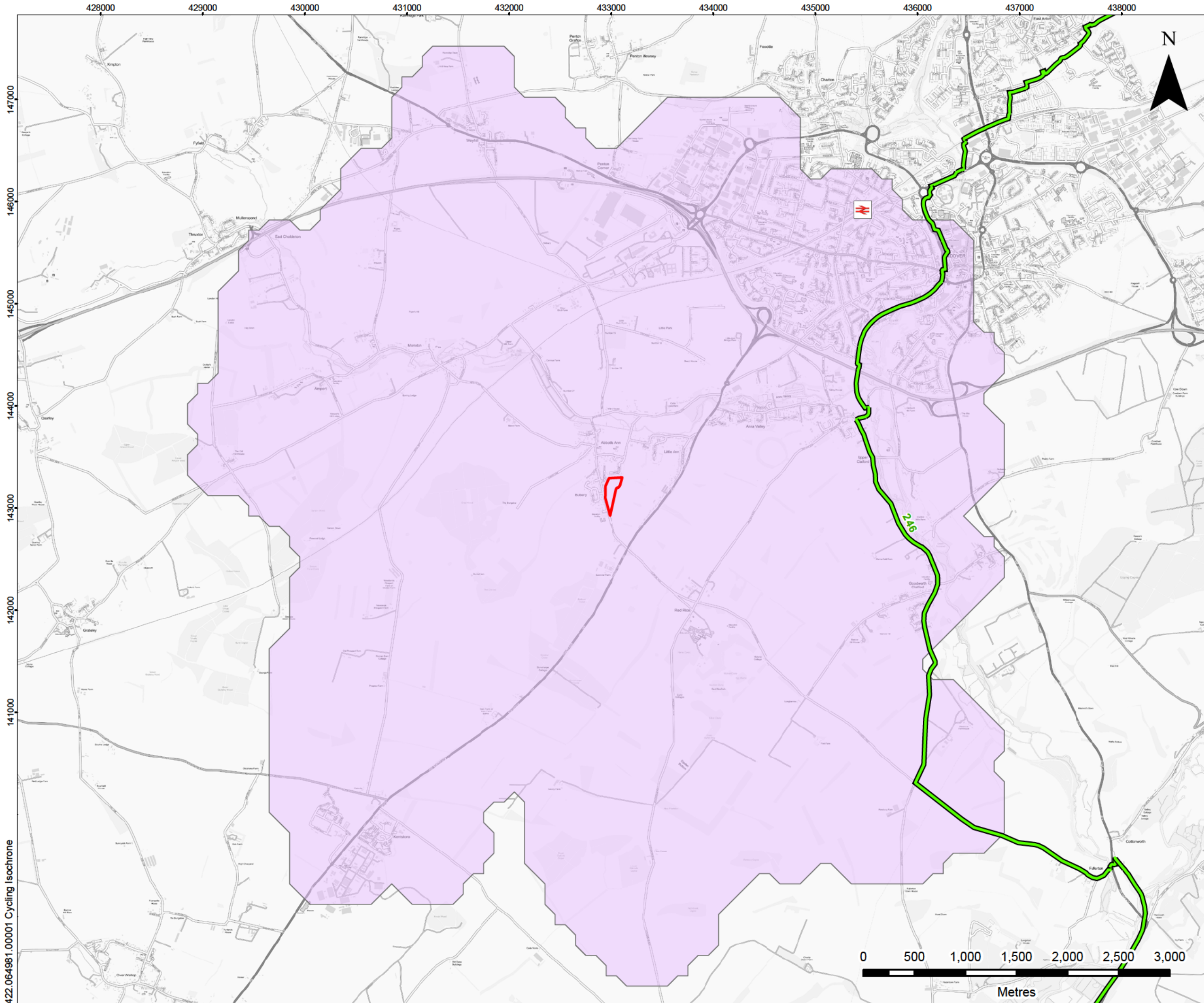
WALKING CATCHMENT

Plan 1

Scale 1:16,000 @ A3

Date MARCH 2024

Appendix C – Cycling Isoc



LEGEND

- Site Boundary
- Railway Station
- National Cycle Network (NCN) Route

Cycling Catchment:

- 0km - 5km

Woolsington One Limited

SLR

422.064981.00001

ABBOTS ANN, ANDOVER

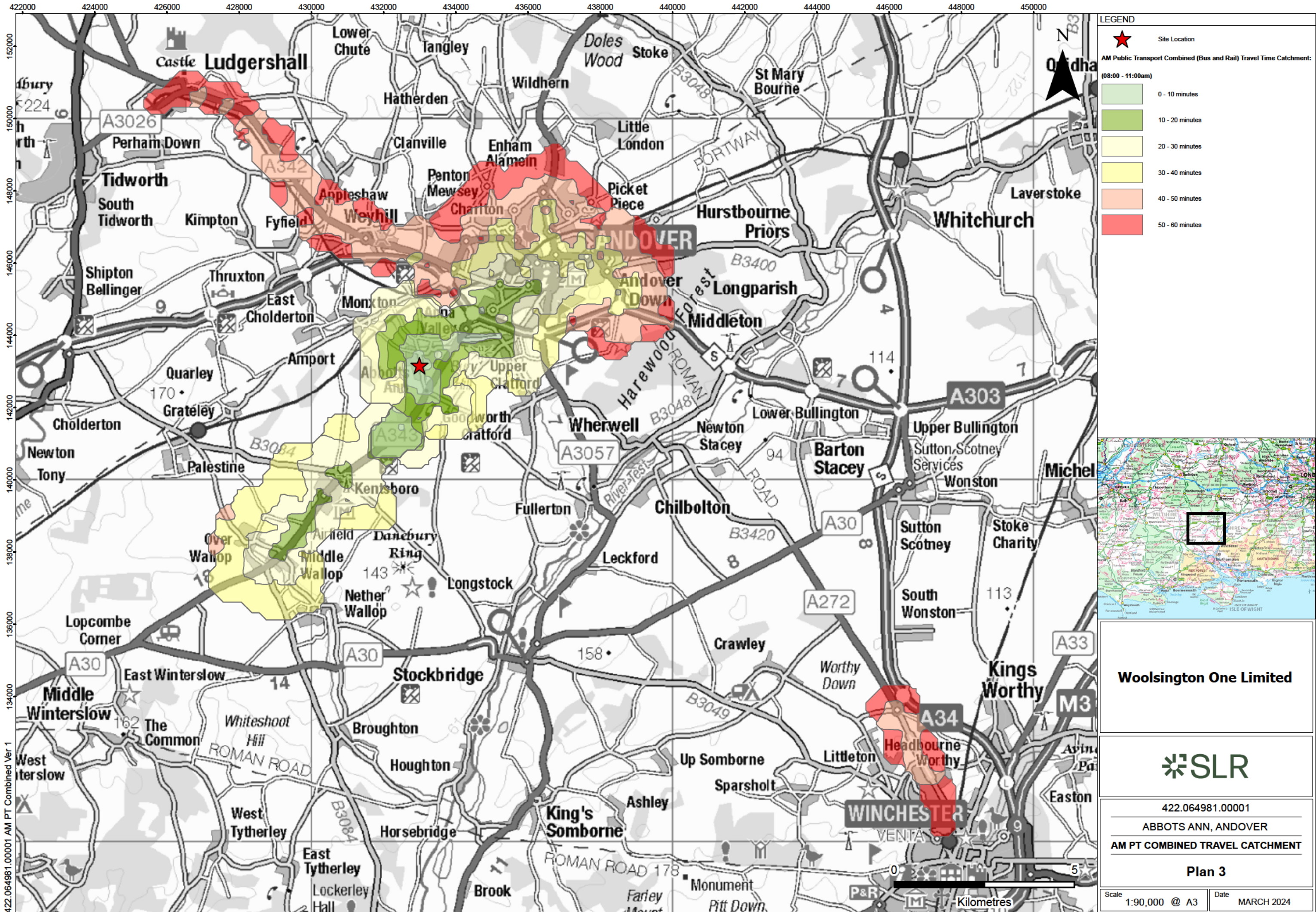
CYCLING CATCHMENT

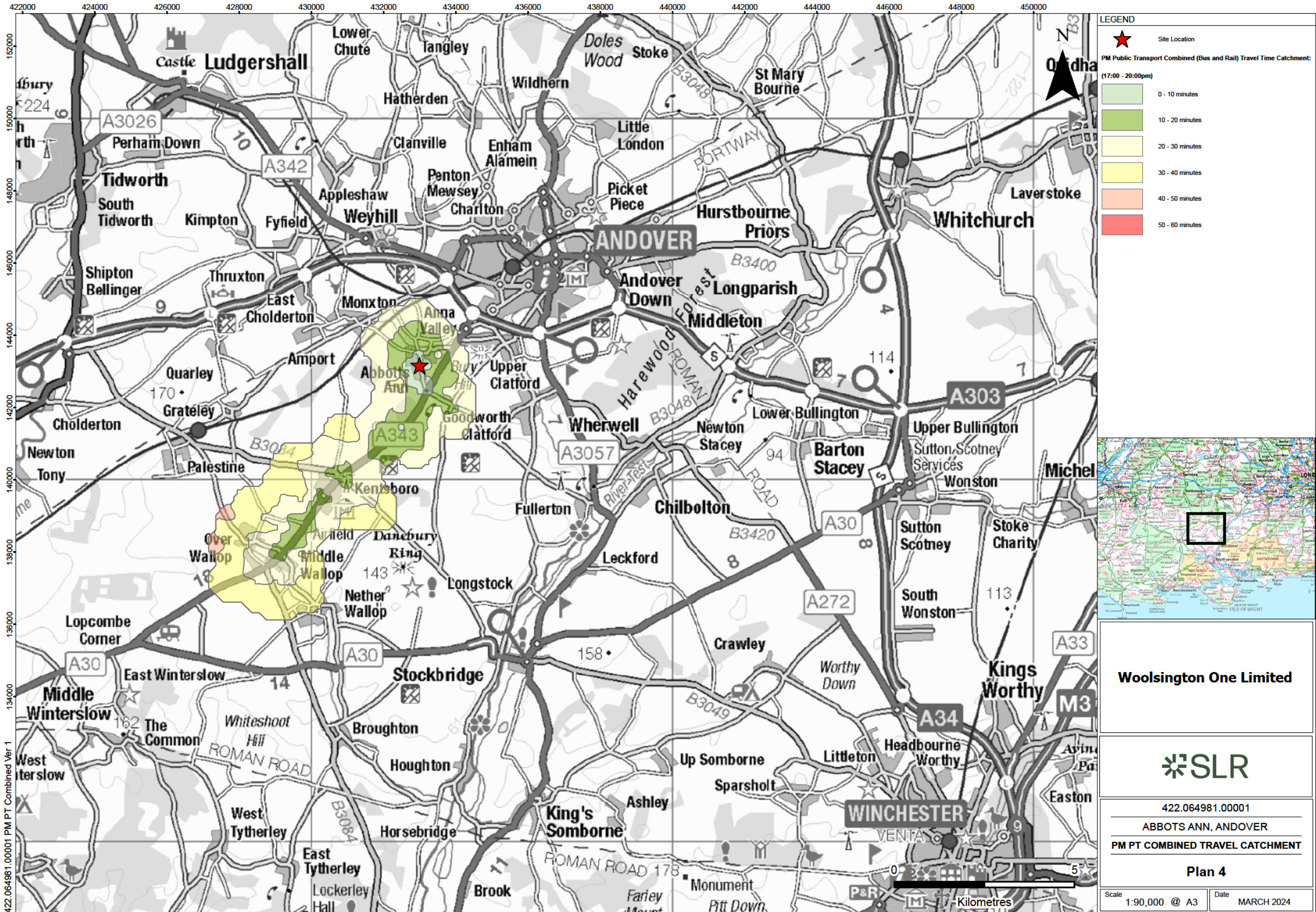
Plan 2

Scale 1:35,000 @ A3

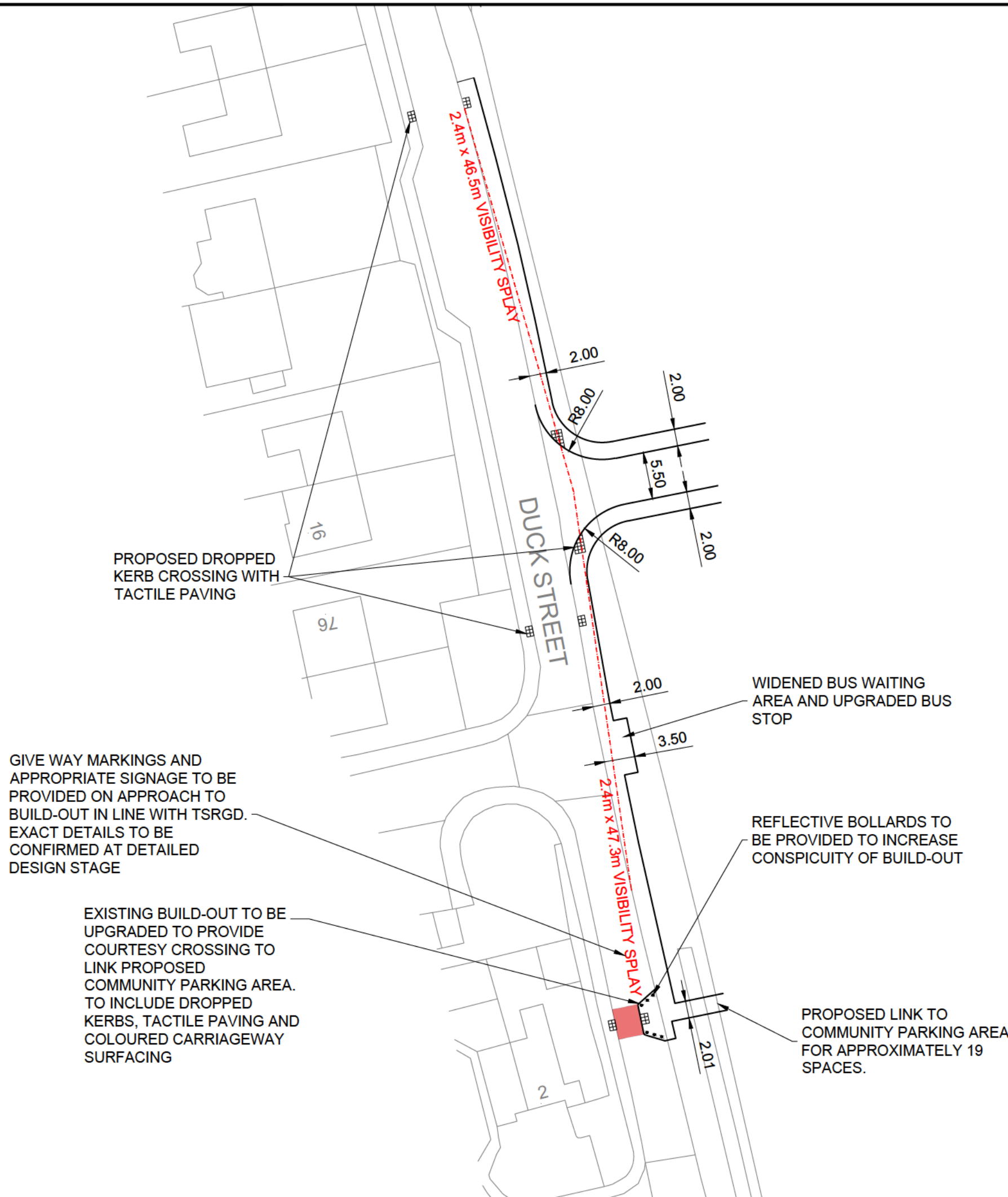
Date MARCH 2024

Appendix D – Public Trans Isochrone





Appendix E – Site Access Junction

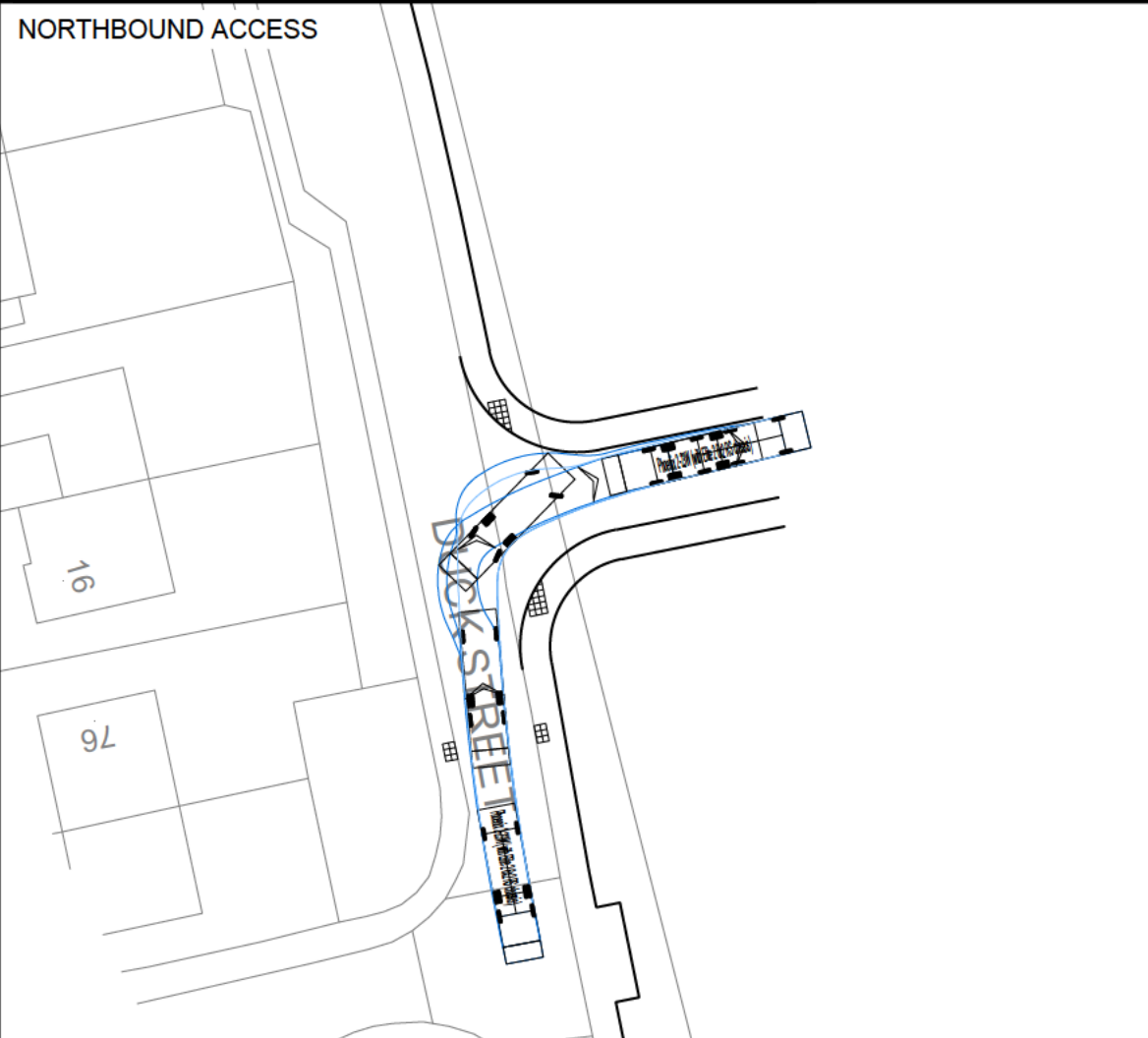


- Notes:
- 1 This is not a construction drawing and is intended for illustrative purposes only.
 2. White lining is indicative only.
 3. Proposed layout is in alignment with PTB Transport Assessment - Figure 4.1

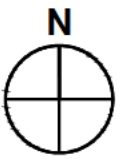
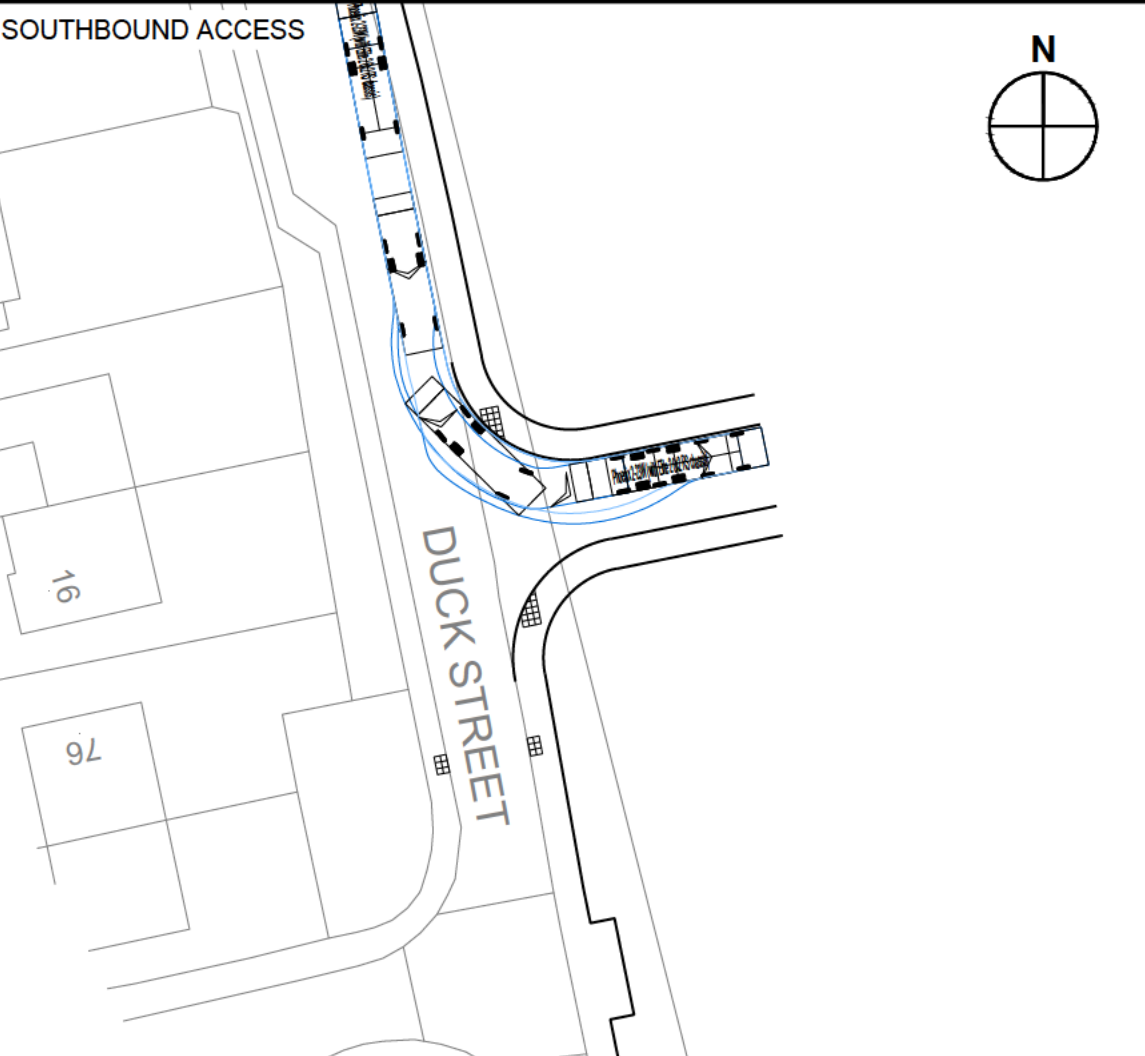
REV.	DETAILS	DRAWN	CHECKED	DATE

STATUS:	
INFORMATION ONLY	
CLIENT:	
Woolington One Limited	
PROJECT:	
Bulbery Field Abbotts Ann	
DRAWING TITLE:	
Proposed Site Access Layout	
SCALES:	
1:500 at A3	
DRAWN:	CHECKED:
JB	JMcK
DATE:	
27.03.2024	
DRAWING NUMBER:	REVISION:
422.064981.00001/PD01	

NORTHBOUND ACCESS



SOUTHBOUND ACCESS



Notes:

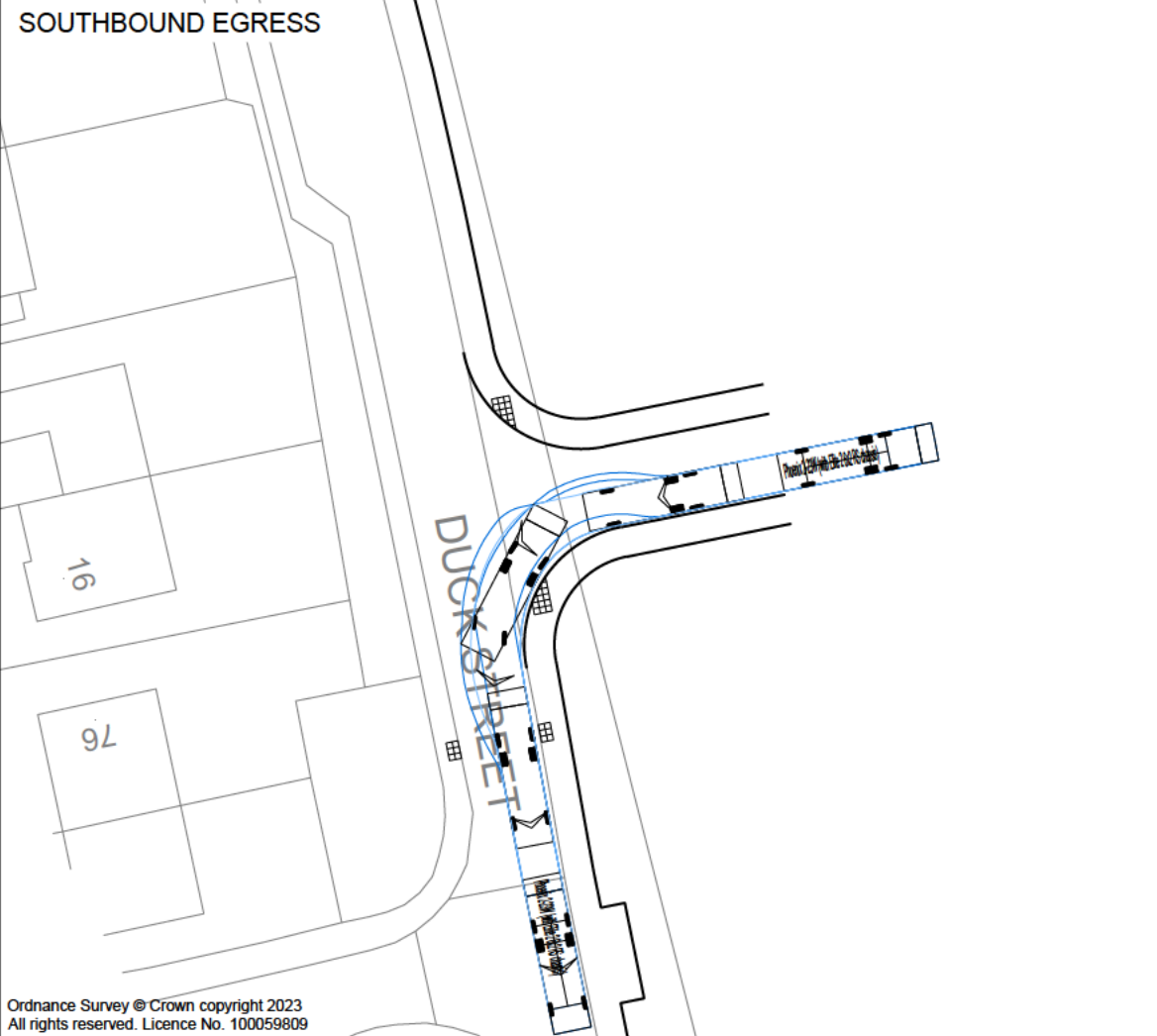
- 1 This is not a construction drawing and is intended for illustrative purposes only.
- 2. White lining is indicative only.
- 3. Proposed layout is in alignment with PTB Transport Assessment - Figure 4.1

Phoenix 2-23W (with Elite 2 6x2 RS chassis)

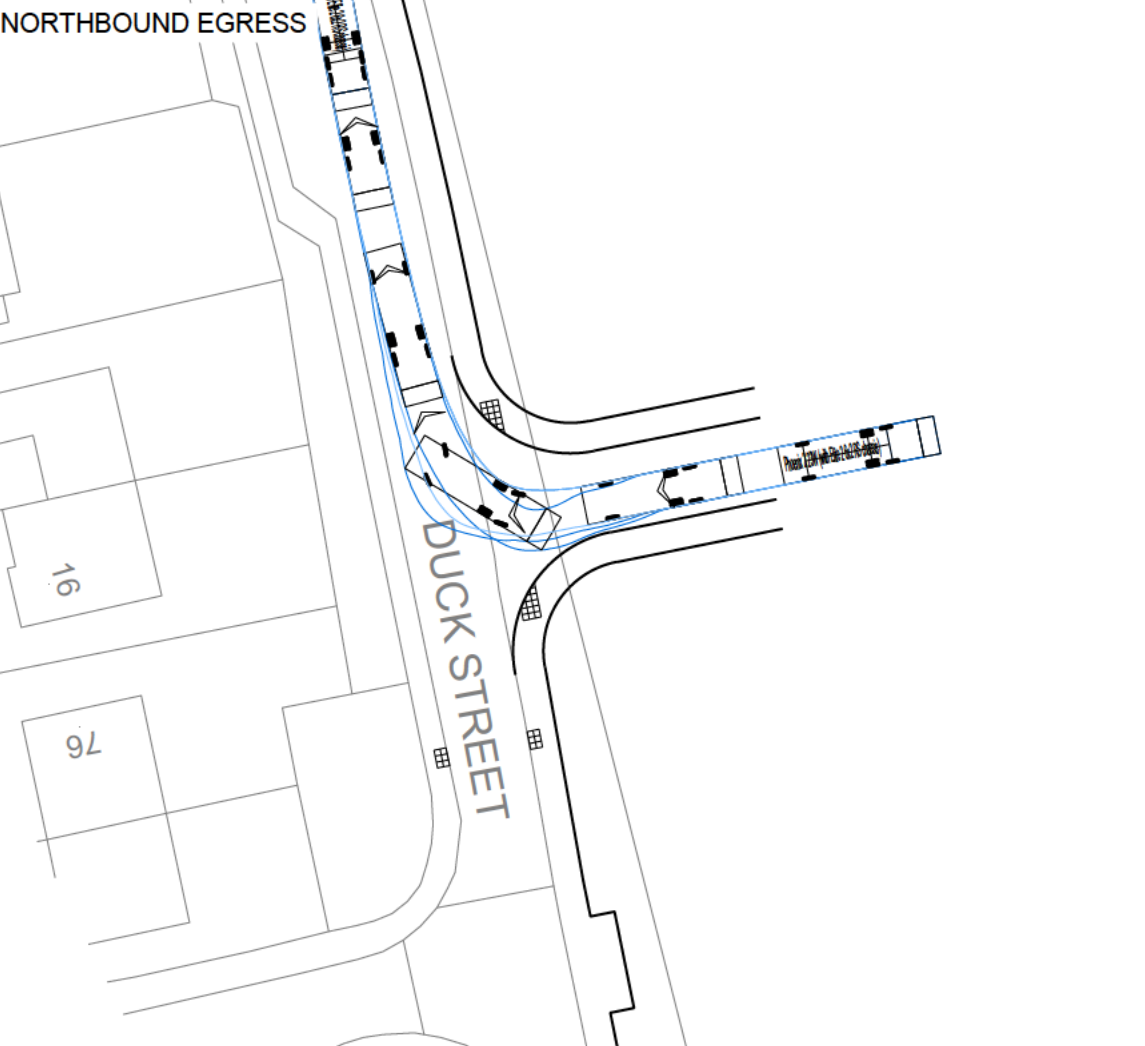
Overall Length	10.520m
Overall Width	2.530m
Overall Body Height	3.211m
Min Body Ground Clearance	0.416m
Track Width	2.530m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	7.500m

REV.	DETAILS	DRAWN	CHECKED	DATE

SOUTHBOUND EGRESS



NORTHBOUND EGRESS



STATUS:

INFORMATION ONLY

CLIENT:

Woolston One Limited

PROJECT:

Bulbery Field
Abbotts Ann

DRAWING TITLE:

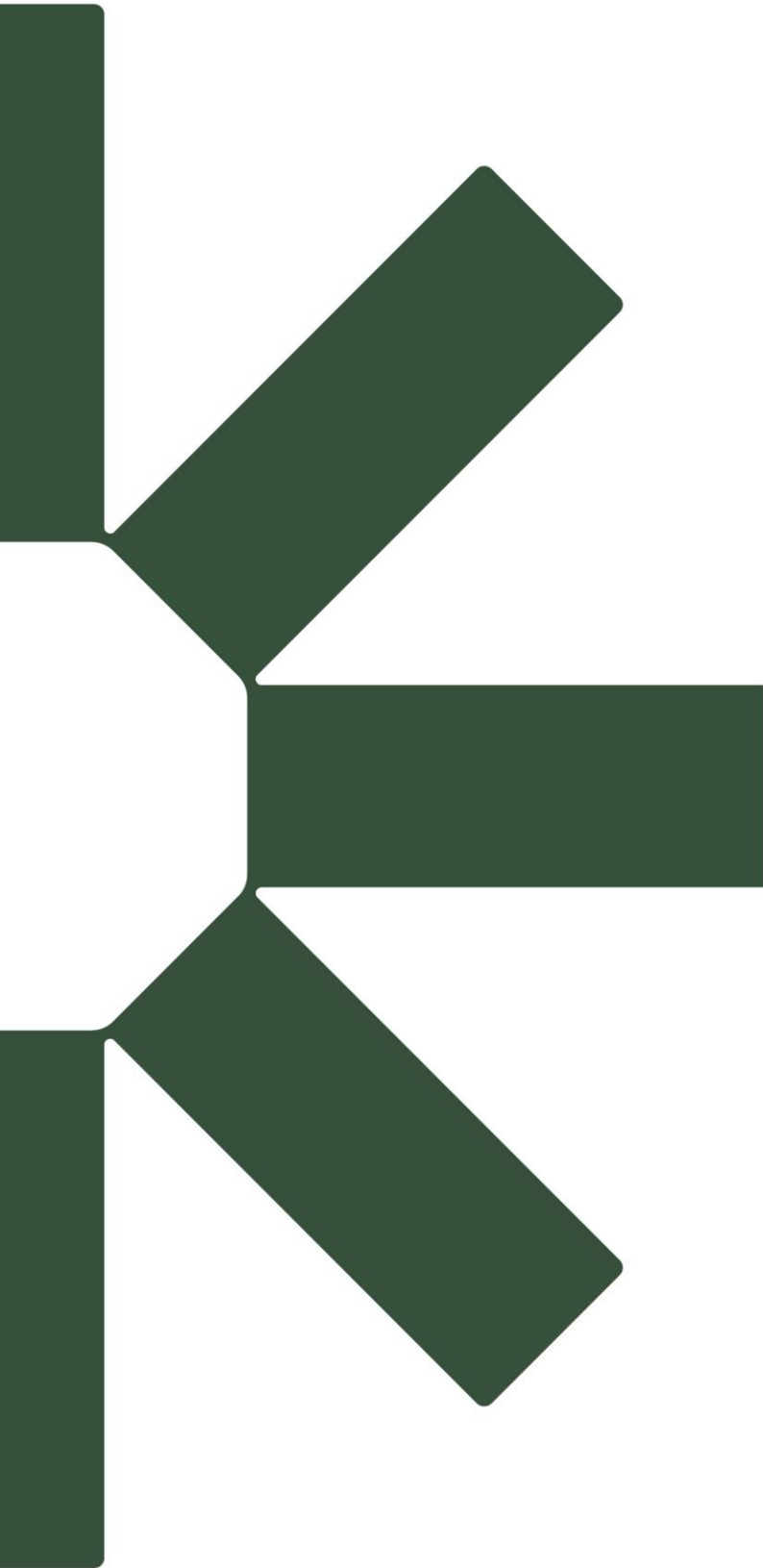
Swept Path Analysis
Refuse Collection Vehicle

SCALES:

1:500 at A3

DRAWN:	JB	CHECKED:	JMcK	DATE:	27.03.2024
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DRAWING NUMBER:	422.064981.00001/PD01/AT01	REVISION:	
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Making Sustainability Happen

SA Scoring Matrix	
Strongly positive	++
Positive	+
Mixed performance	+/-
Negative	-
Strongly negative	--
Depends on implementation	i
Uncertain	?
No effect	0

Site name / address	Land at Bulberry Field
Site reference / SHELAA No: / Submission date	SHELAA ref 300
Promoted Housing capacity	60
Employment uses (Y/N):	Y [Coffee kiosk / EV charging]

Sa Objective	Criteria	Performance		Commentary
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?	++	Strongly positive	The site is promoted for 60 dwellings and will deliver a policy compliant level of affordable homes, including first homes. Scope for inclusion of limited number of self-build units too.
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?	i	Depends on implementation	During construction and long term through coffee kiosk.
	B) Is the site accessible to a strategic employment site by sustainable modes of transport?	+	Positive	Yes, within easy cycling distance of Andover Park and MOD HQ. Andover Town Centre also accessible by bike and public transport (with established bus stops / services next to site). Scope to increase frequency of services.
	C) Is there connection to high quality broadband?	+	Positive	Connection available
	D) Is the site accessible to Andover or Romsey Town Centres?	++	Strongly positive	Andover Town Centre also accessible by bike and public transport (with established bus stops / services next to site) – see

				transport technical note for further information. Scope to increase frequency of services.
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?	++	Strongly positive	The site is within 0.4 miles of an early year's education provider: Abbots Ann Nursery School. It is accessible by footpath.
	B) Is the site accessible to a Primary School?	++	Strongly positive	The site is within 100 yards of Abbots Ann Church of England Primary School.
	C) Is the site accessible to a Secondary School?	+	Positive	The site is within 4 miles of Winton Community Academy.
	D) Is the site accessible to a Convenience Store**** including at a Local / District / Town Centre?	+	Positive	The site is within 0.3 miles from the nearest convenience store (post office / local store in village) and 3.2 miles into Andover Town Centre.
	E) Is the site accessible to a Primary healthcare facility (GP, Health Centre or Hospital)131? [this does not include dentist provision]	+/-	Neutral	The site is within 3.2 miles distance to Andover War Memorial Hospital.
	F) Is the site accessible to a community facility?	+	Positive	The site is within 0.4km of the Memorial Hall in the village. The site is also within 2.6 miles to Burghclere Down, Community Centre
	G) Can the site readily connect to cycleways and footpath networks?	+	Positive	There is a new dedicated footpath running parallel with the eastern boundary. There is a footpath network around Abbots Ann to Little Ann. However, there are no established cycle networks.

	H) Is the site accessible to a bus or rail service?	+	Positive	There is a bus stop directly on the site boundary. However, the bus is very infrequent. Scope to enhance frequency The nearest rail station in Andover.
	I) Is the site able to connect to the highway?	++	Strong positive	The south-western section of the site enjoys frontage along Duck Street.
Objective 4: Encourage the efficient use of land and conserve soil resources.	A) Is the site on previously developed land?	-	Negative	The site is greenfield.
	B) Will development result in the loss of best or most versatile agricultural land?	+/-	Mixed	Part of the site does comprise 'best or most versatile' agricultural land as defined by the NPPF but not the majority of the site (i.e. less than half of the site).
	C) Does the site fall within a mineral and waste consultation area?	+	Positive	The site does not knowingly fall within a consultation area
	D) Does it include a former landfill site?	+	Positive	Site does not include land that comprises a former landfill site
Objective 5. Conserve and, where possible, enhance the water environment and ensure the sustainable management of water resources	A) Is site within a groundwater source protection zone?	+	Positive	The majority of the site is outside the groundwater source protection zone. There is a small section of low risk along the southern end of the site, but this is capable of being 'designed in'.
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?	++	Strongly positive	The site is within flood zone risk 1.
Objective 7: Maintain and, where possible, enhance air quality	A) Would development of the site lead to concerns on air quality in	?	There is potential for	The proposed development of c60 dwellings would generate

	light of national air quality objective levels?		change in air quality and requires further consideration.	additional traffic movements on the local road network. There are no air quality in terms of AQMA in adjoining authority areas would need to be explored further in terms of potential cumulative effects.
Objective 8: Conserve and, where possible, enhance the Borough's landscape, townscapes and settlement character	A) Would development affect landscape character and protected landscapes?	+	Positive	The site comprises a single arable field delineated by established boundary planting on all sides other than to the south-west. It enjoys a high degree of containment and does not form part of designated landscape. Residential properties and gardens back on to the site to the north / northwest and the development of the site would read as a natural progression and rounding off of the settlement
	B) Does the site relate well to the existing settlement and to the immediate context/surrounding area?	++	Strongly Positive	The northern / north west edge of the site is immediately adjacent to the curtilage of residential dwellings. The new school at the southern end of the village also creates a bookend and draw; and the newly dedicated footpath running parallel to the eastern boundary provides an additional layer of containment.
	C) Does the site have the potential to impact the distinction between settlements, or lead to a risk of	+	Positive	The development of the site would not result in a substantive physical or visual coalenscence.

	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?	+	Positive	There are no known designated or non-designated heritage assets within the site. Abbotts Ann Conservation Area encompasses the northern end of the village and there are a number of designated Grade II listed buildings therein, albeit none adjoining the site. By virtue of topography and intervening built form the development of the site is unlikely to affect the setting (visually) nor is there understood to be any notable historic connection.
	B) Is development likely to conserve or enhance the significance of sites of archaeological interest?	?		The site does not sit within an area of known high archaeological potential. Further suite investigations are required.
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?	-		The site is within the zone of influence for the New Forest SPA recreation. The development has the potential to result in or contribute to indirect and or cumulative adverse effects on protected sites.
	B) Will the development conserve habitats and species, achieve net gains for biodiversity and enhance the local ecological network?	+	Positive	Hedgerows around the boundary of the site. The site will preserve existing vegetation and include new planting to enhance the established ecological corridors

				and deliver on-site Biodiversity Net Gain..
	C) Would development conserve and extend quality local green infrastructure provision?	+	Positive	Proposed incorporation of local area of play and trim trail.
	D) Would development affect protected and unprotected trees?	+	Positive	There are TPO trees and unprotected trees located around the site. A tree survey would assist in assessing the value of trees on the boundary, but the working assumption is that such boundary features need not be impacted.
Objective 11: Support the delivery of climate change mitigation and adaptation measures	Will the site contribute towards reducing our impact on the climate?	+/-	Mixed	For the criteria relating to objectives 3,4,5,6, and 10, the site performs negatively in the majority of cases. The site is on a greenfield site; otherwise the site is relatively unconstrained. SuDs features would be incorporated and homes would be to modern standards of energy efficiency.
Objective 12: Seek to maintain and improve the health and wellbeing of the population	A) Is the site accessible to open space?	++	Positive	There is access to formal and informal open space. There are a combination of open space typologies
	B) Is the site accessible to sports facilities?	+	Positive	The site is within 0.2 miles of playing pitch provision within the village. The site is within 3.5 miles away from Andover Leisure Centre.
	C) Would development support the retention and / or	+/-	Mixed	No adverse impacts identified.

	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?	+	Positive	No significant impact. No part of the site is likely to include any areas identified as likely to be exposed to: <ul style="list-style-type: none"> •night time road traffic noise >50 dB(A) Lnight; • night time railway train noise >50 dB(A) Lnight; or • industrial and commercial noise
<p>Summary:</p> <p>This site is located with reasonable accessibility to essential services and amenities in Andover.</p>				