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## Planning Policy

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**From:** Katherine Miles <[redacted]@pro-vision.co.uk>  
**Sent:** 13 September 2018 17:06  
**To:** Planning Policy  
**Subject:** Issues and Options consultation response  
**Attachments:** The Trinley Estate TVLP IO Consultation.pdf; Site Promotion Document - Trinley 1721 V2.pdf

**Importance:** High

Dear Sirs

Please find attached a response to the Local Plan Issues and Options consultation on behalf of our clients The Trinley Estate. In addition, we attach again for consideration as part of the question "Where should the growth go", a site promotion document prepared for the land south of Finkley Farm (SHELAA ref. 231).

I would be grateful if you could acknowledge receipt of these representations.

Kind regards

Katherine

Planning Director

PRO VISION  
PLANNING | ARCHITECTURE | URBAN DESIGN

020 3000 1000  
[www.pro-vision.co.uk](http://www.pro-vision.co.uk)

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Our ref: KM/1721

13 September 2018

Planning Policy Team  
Test Valley Borough Council  
Beech Hurst  
Weyhill Road  
Andover  
SP10 3AJ

Dear Sirs

## **ISSUES AND OPTIONS CONSULTATION FOR THE NEXT LOCAL PLAN TO 2036**

Pro Vision are instructed by The Trinley Estate, to submit these representations in response to the Issues and Options Consultation for the next Local Plan to 2036.

### Introduction

The Trinley Estate is promoting land at Finkley Farm for allocation through the emerging Local Plan.

These representations focus on the consultation questions within the Issues and Options document which relate to the proposed housing strategy of the new Local Plan, and in particular the housing need, how need should be met and where new housing should go.

In preparing these representations we have provided some relevant context and background relating to our clients' land and interest. These representations seek to support the allocation of our clients' site, which could contribute to the delivery of the Council's Vision and Objectives within the next plan period.

### Land to the south of Finkley Farm, Andover

The Trinley Estate is located in north Hampshire and straddles the administrative boundaries of both Test Valley Borough Council and Basingstoke and Deane Borough Council. The Estate is situated approximately 3 miles to the north east of Andover Town Centre.

Since 2015, the Estate has promoted part of its land, known as Land south of Finkley Farm for residential development through the Council's Strategic Housing Land Availability Assessment (SHLAA). The 2015 SHLAA assessment indicated that our client's site (given SHLAA ref. no. 300) could be a suitable broad location for an urban extension to Andover Town, given the proximity of the site to East Anton and existing amenities and public transport links. The 2015 SHLAA placed the site in Appendix 4 which recognised that the site was in Northern Test Valley (NTV), and that a change in policy would be required to bring this site forward for development.

On behalf of the Trinley Estate, Pro Vision has continued to promote the site through the latest 2018 Strategic Housing and Economic Land Availability Assessment (SHELAA). The SHELAA submission was supported by a Site Promotion Document which confirmed the suitability of the site for future development. The Council took a different approach to its site assessment in 2018 compared to the 2015 SHLAA and as a result the site (SHELAA ref. 231) was placed within Appendix 6 of the SHELAA with the Council suggesting that the site is a rural location and unsuitable for development.

On behalf of our client, Pro Vision has raised concerns with the Council's approach, which presently means that this site would be excluded from the Sustainability Appraisal. The Council has made a commitment to review their assessment of the site before any Sustainability Appraisal is undertaken. The outcome of the review is awaited.

Notwithstanding the above and whilst our client recognises that the purpose of the SHELAA is not to allocate sites for housing, part of its purpose is to assess the suitability of sites and identify broad locations for future development. The fact that the 2015 SHLAA recognised this as a site which could be a suitable broad location for an urban extension to Andover is highly relevant in considering the proposed strategy for development in the Borough in the next Local Plan period. The site is relatively unconstrained, lying outside of any existing green gap or Area of Outstanding Natural Beauty (AONB). There are no overriding physical constraints that would inhibit delivery of this site, and therefore the Estate are firmly of the view that the land south of Finkley Farm should fall within Appendix 4 of the SHELAA and be allocated for development in Local Plan 2036.

#### Test Valley Local Plan Vision and Objectives

### **Q3. What should the Local Plan aspirations be for the next 20 years?**

The Trinley Estate generally support the existing Local Plan vision and objectives. At Paragraph 4.4 of the Issues and Options consultation document it is stated that a new vision will be developed for the new Local Plan. The Trinley Estate considers there is a need to provide certainty about the future strategy and therefore it is suggested that the Vision makes clear the commitment to meet development needs in full through appropriate development in sustainable locations.

One objective should provide confirm the Council's intentions to meet the full 'objectively assessed' housing need during the plan period to ensure development needs are met.

#### Planning for Growth

### **Q4. Should the Local Plan's housing requirement be consistent with Governments standard methodology? Do you have any evidence to support your view?**

The current Local Plan seeks to deliver 588 dwelling per annum. In September 2017 the Department for Communities and Local Government published the 'Planning for the right homes in the right places: consultation proposals' which followed on from the Housing White Paper 'Fixing our Broken Housing Market' published in February 2017. The Right Homes Right Places consultation proposed a new approach to calculating housing need through the introduction of a standardised methodology. This is based on publicly available data using the household growth projections (to establish the demographic baseline). An adjustment is then made for market signals to help increase the affordability of homes and a cap is applied to ensure deliverability. Based on the above formula, Test Valley would have an indicative minimum housing need of 569 dwellings per annum.

In accordance with Paragraph 60 of the Revised Framework (published 24 July 2018) the strategic policies of the emerging Local Plan should be informed by a local housing need assessment conducted using the Government's standard methodology. However, we emphasise that such an assessment determines a minimum figure. It is possible to plan for more, and in sustainable locations such as Andover, it reasonable for the Council to plan for more housing to meet the Governments objective of 'significantly' boosting the supply of homes across the country.

The 2014 Strategic Housing Market Assessment made various recommendations around housing need. It was identified that planning for around 590 homes per annum would meet the

demographically led needs and allow for a reasonable growth in the local labour force. It was also identified that there was a significant requirement for new affordable housing in the Borough. An overall net deficit of 5,261 affordable homes was identified over the plan period until 2031, equating to a requirement for 292 new affordable homes per annum. This need could not be met solely through the planned supply and therefore it is anticipated that an unmet need for affordable housing will remain going into the new plan period.

Paragraph 61 of the Framework requires the size, type and tenure of housing needs to be assessed and reflected in planning policies. Whilst large parts of the District are rural, Andover, is a sustainable settlement with a range of higher order services and is well connected to the local road network. The A303 runs to the south of the Town Centre providing links to the A34 and M3. The Town is also served by local and national rail networks providing connections to London and Salisbury. The town not only provides a sustainable location for those working in the Borough but also to residents who commute to other destinations outside of the Borough.

The Trinley Estate therefore consider that it is reasonable for the Council to plan for more than the minimum number of new homes identified through the Standardised Method. By doing so, the Council will significantly boost the supply of new homes within the Borough to help provide homes for those in need, and to reflect demographic changes. However, boosting the supply above the minimum can also support the economic prosperity of the Borough in line with the Council's vision. In addition, regard must be had to whether the Council can help meet unmet needs of other neighbouring authorities through the Duty to Cooperate. Test Valley is relatively unconstrained by Green Belt, National Parks, AONB's and SSSI's when compared to its neighbours, with only 14% of the Borough covered by such designations.

In summary, the housing requirement should meet at least the minimum need identified through the standard methodology, however, given the relatively unconstrained nature of the Borough and the sustainability of Andover, (including to assist the Council in meeting its objectives), the new Local Plan should seek to deliver significantly more new homes than the minimum figure.

**Q5. Should the Local Plan increase its housing requirements to help support economic growth? If yes, do you have evidence to support this?**

There are a number of factors specific to Test Valley which mean that the Borough needs to plan for more than the minimum housing need. In addition to the population growth and the fact that households are becoming smaller, Test Valley has a significant ageing population. Whilst this is a nationwide issue, it is particularly high in Test Valley when compared to Hampshire as a whole. Not only is the Borough forecasted to have a slow increase in the proportion of people of working age, but by 2024 it is anticipated that there will be 43 elderly people for every 100 people of working age. With people living and occupying their own homes for longer and the potential for an increasing imbalance in the ratio of working age to retired residents, there is a clear need to boost the supply of new homes to support the local labour force and the continued economic growth of the Borough.

The affordability of housing is also recognised as a key issue within Andover and throughout the Borough. In 2013, it was calculated that in and around Andover approximately 40% of residents were unable to afford to purchase their own home without subsidies. The latest housing affordability projections for England and Wales 2017 indicate that the affordability gap is set to worsen in the south and south east. The lack of affordability could have a significant impact on the retention of a strong local workforce and also on the ability of existing business within the Borough to attract new employees to support their continual economic growth. There is therefore a need to boost significantly the supply of homes to support the continued economic growth of the District.

### Where should growth go?

Section 5 of the Revised Framework considers how local authorities should identify land for new homes and states that authorities should have a clear understanding of the land available within their area and should identify a sufficient supply and mix of sites taking into account suitability, availability and economic viability.

The Trinley Estate support generally an approach to distribution that includes for some sustainable growth around existing villages to support the creation of sustainable rural communities. Such an approach should also allow for rural housing through conversions of redundant buildings in the countryside, and the provision of new homes such as on brownfield land and infill dwellings in locations which are not isolated. Isolated new homes in the countryside should also be permitted where the provisions of Paragraph 79 of the Framework are met.

However, in order to deliver the infrastructure and facilities needed to support an increased population within the Borough, it is clear that the Council will need to make strategic allocations of land for large sites through the Local Plan. Paragraph 72 of the Framework recognises that:

*"the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities".*

In doing so, the Framework recognises that following the Garden City Principles can help meet identified needs in a sustainable way.

It is expected that Andover, as the main town within the Borough, will remain the primary focus for a significant proportion of the housing need. In principle, The Trinley Estate support this approach, however, it is considered that the Borough should adopt a policy of concentration rather than dispersal and provide a significant proportion of the Borough's future housing through a new sustainable urban extension to the north-east of Andover. This will not only significantly boost the supply of market and affordable housing but also provide the necessary quantum of development to fund the provision of the necessary infrastructure and facilities to meet and support the new community and deliver social, economic and environmental benefits for future generations.

The Estate's land south of Finkley Farm, together with the adjacent plot (also being promoted for housing by Taylor Wimpey), provides an ideal opportunity for a strategic urban extension to Andover providing housing growth on the north eastern edge of town by following and respecting a pattern of growth that has occurred over the past plan periods. Comprising 130ha of land, the Estates land could make a significant contribution towards meeting the housing need of the Borough and take pressure away from more sensitive, less sustainable areas of the Borough.

The site is located approximately 1 mile to the north east of the centre of East Anton. The site comprises an open parcel of agricultural land which has good access to the local road network to the north and is abutted by the railway line to the south. The site is well connected to Andover Town Centre and to the Town's existing employment centres by road and is accessible by public transport. The site is clearly well-related to the settlement being located on the north eastern edge of East Anton and would appear as a logical and sympathetic extension to Andover.

The site itself is not subject of any ecological or landscape designations. There are no listed buildings on or adjoining the site. The site is located in flood zone 1 and is suitable for residential development. There are two Scheduled Ancient Monuments (SAM's), Devils Ditch and evidence of

a roman house east of Finkley farm, both of which are located in the south eastern corner of the site. A woodland block is located in the south eastern corner of the site adjacent to the Devils Ditch. However, the SAM's are not considered to unduly restrict the future development of the site and can be sympathetically accommodated within a future scheme.

The Site Promotion document submitted to the Council in July this year (and appended to these representations) demonstrates that the site could be developed to create a distinctive new neighbourhood based on garden city principles with opportunities for housing, employment, retail and education as well as new public open space.

The concept masterplan illustrates that development could be delivered in a sensitive manner which responds to the site's constraints and opportunities and importantly respects and enhances the setting and accessibility of the Scheduled Ancient Monuments and woodland located on the site. The proposed masterplan indicates that the site could accommodate:

- Approximately 2,500 market and affordable homes;
- A commercial centre with 10-15ha of new employment and retail opportunities;
- Provision of an education hub including a 4-5ha site for new secondary school;
- Creation of a country park with opportunities for formal and informal recreation reinforcing the setting of the Scheduled Ancient Monument and existing woodland;
- An appropriate buffer to the railway line with new strategic landscape planting belt;
- Retention and enhancement of the hedgerows surrounding the site to provide wildlife corridors and foraging ground for a variety of species and an opportunity for biodiversity net gain; and
- Strategic pedestrian and cycle links connecting to Andover Town Centre and existing public rights of way in the area.

In addition, the site has potential to help meet the needs of the aging population through providing a care village including retirement homes and extra care accommodation. The site is also immediately adjacent to the railway line and there is therefore potential to enhance connectivity through a new railway crossing and/or potentially also a new Andover East railway station with associated parking.

The site promotion document sets out the vision for a comprehensive development of the site and provides a framework for bring the site forward as a strategic urban extension through Local Plan 2036. Importantly it establishes that not only is it the most logical strategy for significant future growth in the Borough, but that the site is suitable, available and deliverable for development within the next plan period to meet the future housing requirements of the Borough.

We trust that the above will be taken into account when preparing the Local Plan consultation document. The Estate also wish to reiterate that they remain willing to meet with the Council to discuss ways in which this site can come forward through the Local Plan within the next plan period.

Yours sincerely

**KATHERINE MILES** BA (HONS) MSc MRTPI  
PLANNING DIRECTOR

cc. The Trinley Estate

