

Planning Policy

From: Owen Jones <oj@...>
Sent: 14 September 2018 15:29
To: Planning Policy
Cc: Ruth McKeown; Nathan Edwards; Kate Coventry
Subject: Test Valley Local Plan Issues and Options Consultation
Attachments: 180914 covering letter.pdf; 180914 Test Valley Local Plan Issues and Options Response.pdf; 151 - Andover Vision Document - 14 Sep 18_High Res.pdf

I herewith enclose representations to the Issues and Options Consultation on behalf of my Client, Hallam Land Management Limited. Our submitted representations comprises three principal sections:

- Section 2: requirements of the new National Planning Policy Framework;
- Section 3: an overview of Andover, including its role and function; and
- Section 4: the response to the relevant consultation questions.

In addition, we are submitting a Vision Document for the development opportunity at Littlebridge situated to the south west of Andover.

Together, these demonstrate the role and function of Andover as the pre-eminent settlement in the Borough, its suitability as the continued focus for new development and the opportunity to create a Garden Suburb at Littlebridge to accommodate large scale development in a sustainable manner. I trust you consider our representations in formulating the new Local Plan and we would welcome the opportunity to enter in to a positive dialogue with you in respect of these proposals. In any event I would be grateful to receive confirmation that the representations have been duly received.

Yours sincerely

Owen Jones MRTPI
 Director

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14th September 2018
Our Ref: KC/18.254

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

Dear Sir/Madam,

Test Valley Local Plan Issues and Options Consultation

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Yours sincerely,

A handwritten signature in black ink, appearing to read 'Owen Jones', is written over a horizontal line.

Owen Jones
Director

cc: Ruth McKeown / Nathan Edwards



LRM
PLANNING
LIMITED

TEST VALLEY LOCAL PLAN

OUR FUTURE – HOW DO WE PLAN FOR IT? ISSUES AND OPTIONS CONSULTATION

Representations prepared on behalf of
Hallam Land Management Limited

September 2018



Report Control

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1 Introduction

- 1.1 These representations are submitted on behalf of Hallam Land Management Limited. Hallam is a strategic land promotion company operating throughout England, Wales and Scotland, delivering land for new employment and commercial, housing and mixed-use developments.
- 1.2 Hallam control land to the south west of Andover which is suitable for residential-led mixed use development. Andover is the pre-eminent settlement in the Borough and, reflecting its role and function as a sustainable settlement, it is the focus for the majority of new development in the current Local Plan. Further development in this location would contribute to meeting the future needs of the Borough, whilst achieving a sustainable pattern of development.
- 1.3 Our representations comprise three Sections. In Section 2 we summarise the requirements of the new National Planning Policy Framework. In Section 3 we provide relevant information about the role and function of Andover to supplement the portrait of the Borough in the consultation document. In Section 4 we respond to relevant questions posed in the consultation document.



2 National Planning Policy Framework

- 2.1 The consultation document acknowledges that, at the time it was written, the then current National Planning Policy Framework was expected to be replaced.
- 2.2 As anticipated, a new version of the NPPF was published in July 2018.
- 2.3 The NPPF sets out the Government's planning policies for England and how these should be applied. The Tests of Soundness require that a Local Plan is consistent with national policy and should enable the delivery of sustainable development in accordance with its policies.
- 2.4 The Plan-Making Section of the NPPF sets out the expected scope and content of a new Local Plan.

Achieving Sustainable Development

- 2.5 The purpose of the planning system is to contribute to the achievement of sustainable development and there are three overarching objectives – economic, social and environmental. These are interdependent and are to be pursued in mutually supportive ways.
- 2.6 For plan-making, the presumption in favour of sustainable development means that plans should positively seek opportunities to meet the development needs of their area, with sufficient flexibility to adapt to rapid change. Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. Only when areas of protection afforded by the NPPF provide strong reasons not to, or when any adverse impacts significantly and demonstrably outweigh the benefits, should this principle be departed from.

Plan-Making

- 2.7 The Local Plan must include strategic policies to address each local authority's priorities. In summary, Local Plans should:
 - a. be prepared with the objective of meeting sustainable development;
 - b. be positively prepared 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).



Strategic Policies

- 2.8 The Local Plan's strategic policies are required to set out an overall strategy for the pattern, scale and quality of development, 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.
- 2.9 Moreover, strategic policies should look ahead for a minimum of 15 years from the date of adoption, to anticipate and respond to long-term requirements and opportunities. They should also provide a clear strategy for bringing forward sufficient land, 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 will include allocating sufficient sites to deliver strategic priorities in the area.

Tests of Soundness

- 2.10 The new NPPF includes tests of soundness in a slightly amended form. Plans will be sound if they are:
- a. **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;
 - b. **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - c. **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - d. **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

Delivering a Sufficient Supply of Homes

- 2.11 The Government's objective to significantly boost the supply of new homes is restated in the new NPPF. To support this, it is important that a sufficient amount and variety of land can come forward where it is needed and that the needs of groups with specific housing requirements are



addressed.

- 2.12 A Local Housing Needs Assessment will inform decisions about the minimum number of new homes needed. This will be conducted using the standard method in national planning policy unless exceptional circumstances justify an alternative approach. The Government have signalled their intention to review the standard method later this year and the Local Plan's housing strategy will need to have regard to this in due course.
- 2.13 In turn, planning policies should identify a sufficient supply and mix of sites taking in to account their availability, suitability and likely economic viability. Planning policies should identify a supply of specific, deliverable sites for years one to five of the plan and specific, developable sites or broad locations for growth for years 6-10 and where possible for years 11-15 of the plan.
- 2.14 In this regard, the supply of a large number of homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.

Promoting Sustainable Transport

- 2.15 Allied to the above, the planning system should actively manage patterns of growth in support of sustainable transport objectives. 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. Planning policies should support an appropriate mix of uses across an area and within larger scale sites to minimise the number and length of car journeys needed for employment, shopping, leisure, education and other activities.

Synthesis

- 2.16 The above illustrates central tenets in the NPPF that the new Local Plan will need to conform with: the need to plan positively to meet, as a minimum, objectively assessed needs for new development and to ensure that new development is directed to sustainable locations to achieve the overarching objectives of sustainable development.
- 2.17 In this context, the following section considers in more detail the role and function of Andover as a suitable and sustainable location for future development.



3 Andover

- 3.1 The Consultation Document provides contextual information concerning the characteristics of the Borough. To supplement this, and to illustrate the pre-eminence of Andover as a location at which new development should be located, we have produced a similar pen-portrait for the town. In turn this provides context for certain of our responses provided to the questions posed in the consultation document.

Population

- 3.2 The current population of Andover is approximately 47,500 residents, with a commitment in the current Local Plan for an additional 6500 new homes to be provided by 2029. This will increase the town's population to over 60,000 residents. Its role and function are commensurate with the scale of the settlement and provides a focus for the Borough's rural hinterland.
- 3.3 Other settlements in the Borough are significantly smaller. The population of Romsey, the only other major centre in the Borough, is only a third of that of Andover's. Romsey is a historic town which is part of the cluster of settlements associated with the Solent Waterside area.
- 3.4 The structure of Andover's population is in marked contrast to that of the Borough as a whole. Whilst the Borough has an ageing population, Andover is characterised to a greater extent by a younger population. The proportion of the population in the younger and economically active cohorts is greater in Andover than elsewhere in the Borough. Conversely, the proportion of Andover's population who are elderly is smaller.

Local facilities

- 3.5 There is a wide range of facilities and services at Andover, typical of a settlement of this size. This includes major retail, employment, secondary and further education, leisure, sports and health and public transport provision.
- 3.6 The town centre offers both retail and employment opportunities and a range of local amenities and services for residents. Andover Business Park, recently developed to the south west of the town, is a premier employment location near the town centre.
- 3.7 Andover has a range of educational facilities, including higher and further education at Andover College.
- 3.8 Andover benefits from both bus and rail based public transport. Situated on the main line railway, it is accessible to London Waterloo with a half hourly services and a journey time of little over an hour. Other destinations include Salisbury and Exeter.
- 3.9 Andover War Memorial Hospital is situated in the town centre and as part of Hampshire NHS Foundation Hospital provides extensive healthcare.
- 3.10 In contrast, whilst Romsey is the second largest settlement, it has a much smaller level of facilities and looks to the larger urban areas of the Waterside for higher order services. Although served by a rail line, these services are more intra-regional. The retail centre is smaller in size reflecting its smaller population and proximity to other larger settlements.



- 3.11 The 'Andover Profile Report' published by Test Valley in June 2017, highlights the shortfall of public open space within Andover. Based on the 2011 population figures, there is a requirement for some 110ha, whereas the current amount of open space is on 80ha. Increasing and improving open space is a theme of the 'Andover Vision'.

Economy

- 3.12 Andover is the main economic centre within the Borough and, as emphasised in the Economic Development Strategy, plays an important economic role with employment growing by 25% between 2010 and 2015. This is a larger proportionate growth than for the Borough as a whole. Following this pattern, future growth can be expected to be focused at Andover, reflecting its structural and spatial advantages.
- 3.13 In the 2011 census, 75.8% of Andover residents aged 16-74 years old were economically active, higher than the proportion in the Borough. Job Density at Andover is also the greatest in the Borough. The growing young population of Andover supports economic growth and labour supply.
- 3.14 Of the economically active residents in Andover, 61.3% are in either full time or part time work. This is higher than the 57.5% in the Borough.
- 3.15 Within Andover there is a higher proportion of the population employed in higher skilled occupations. However, and in addition, the manufacturing base in Andover is stronger than elsewhere in the Borough. The Economic Development Strategy highlights that one in eight jobs (12%) are in this sector. This is greater than both the Borough and Regional proportions.
- 3.16 The British Army Land Forces Headquarters opened a new complex at Marlborough Lines in July 2010, which represented a significant investment in the town.

Commuting Patterns

- 3.17 Andover is a settlement with a significant degree of self-containment. The Economic Development Strategy highlights that more of Andover's residents work locally rather commute further afield, and its 50% 'self-containment' is high compared to most towns, especially the southern parts of the Borough.
- 3.18 The Sustainability Appraisal that accompanied the Adopted Local Plan demonstrated that for the Andover area, approximately 76% of employed residents worked locally, while around 70% of local jobs were taken by local residents.
- 3.19 Maintaining and improving further this degree of self-containment is an important planning and land use objective.
- 3.20 In contrast, reflecting its smaller employment offer and the effect of its proximity to other large settlements, Romsey experiences significant out-commuting.

The Suitability of Andover for Additional Development

- 3.21 Reflecting the above characteristics, and as a matter of principle, Andover continues to be a location eminently suitable for development and to serve as the focus for the distribution of



development in the Borough. In the context of the requirements of the NPPF for policies and proposals to achieve a sustainable pattern of development, Andover represents the town best suited to achieve this.

- 3.22 Moreover, given its transportation links with such settlements as Basingstoke, Winchester, Southampton, it is also well suited to meeting unmet need from adjoining Authorities.
- 3.23 There are limited environmental constraints to future development at Andover. Development can be sensitively located without harming the character of nearby settlements. In comparison, Romsey, which has a raft of designations including European protected habitats, has little genuine opportunity to accommodate further large-scale development.
- 3.24 Whilst the Borough is characterised by an ageing population, the structure of Andover's population is aligned with the town's role as the economic centre of the Borough with it having the greatest proportion of economically active residents. It also has a significant level of self-containment which should be maintained and improved.
- 3.25 The recent development of Andover Business Park represents a significant investment in the growth of the town. Development opportunities that capitalise on its locations adjacent to the A303 are clearly beneficial to the town's growth in the longer term and the juxtaposition of housing and employment is a positive factor in the location of new development. This is especially the case where new development would enable investment in the town's existing infrastructure.
- 3.26 For the reasons given in this Section, and reflecting both the fact that Andover has proven capable of assimilating growth historically and advice in the NPPF that the new Local Plan should look plan to meet as a minimum objectively assessed need for new development, any future development strategy for the Borough should prioritise the opportunities afforded at Andover to accommodate new development.



4 Response to Consultation Questions

- 4.1 Having set out in earlier sections the planning policy framework which the new Local Plan will need to comply with, the sustainable development policy objectives it will need to contribute towards, and the characteristics of the Borough and pre-eminence of Andover, in this Section we provide a response to the relevant Questions posed in the consultation document.

Question 4: Should the Local Plan's housing requirement be consistent with Government standard methodology?

- 4.2 The Council will need to produce an up to date Local Housing Needs Assessment. This will identify the minimum number of new homes needed through the application of the standard method set in national planning guidance. Only where there are exceptional circumstances would an alternative departure be justified.
- 4.3 Presently, the standard methodology provides an indicative assessment of housing need for the period 569 dwellings per annum. Whilst this information is only available for the 2016-2026 period, NPPG intends that it is applied for the whole of a plan period.
- 4.4 In the adopted Local Plan Policy COM1: Housing Provision 2011-2029 proposes 588 additional dwellings per annum which indicates the continuing need for housing development of a similar magnitude over the new plan period.
- 4.5 However, the Government have signalled their intention to review the standard method later this year in the context of the new household projections which may give rise to new and additional figures.
- 4.6 It is important to recognise though that the standard methodology does not of itself translate immediately into the housing strategy. The NPPF's presumption in favour of sustainable development requires that the Local Plan's strategic policy provides in the first instance, as a minimum, the Objectively Assessed Need (OAN) for housing and other uses.
- 4.7 In this regard the Council will need to consider the implications the OAN has in forming a judgement about whether a higher housing requirement would be more appropriate. This will need to consider such matters as the structure of the local population now and in the future, the economic strategy and growth objectives, changes in labour supply versus labour demand and the level of affordable housing that should be provided, unmet need for adjoining local authority areas, previous rates of housing delivery. This is especially the case when the NPPF expects the OAN requirement to be the minimum level provided for through the Local Plan.
- 4.8 Similarly, in the context of an objective to exceed the OAN, the Council will need to consider capitalising on opportunities afforded by available and suitable development sites and the benefit of a higher housing requirement in such instances.

Question 5: Should the Local Plan increase its housing requirement to help support economic growth?

- 4.9 The Borough's economic aspirations will be one of the factors that will need to be taken in to account in determine the housing requirement. Test Valley's Economic Development Strategy



explains the local economic context and identifies the key considerations and objectives for developing the local economy in the future. The Borough is characterised by an ageing population and is forecast to have a slower increase in the proportion of people of working age. Indeed, the Economic Development Strategy highlights the importance of an improved availability of skilled and highly skilled labour. Similarly, the Andover Vision sets out an ambition to see further economic growth and opportunities at the town. To ensure that the Borough's economic development objectives can be met it will be important to ensure that sufficient labour supply is available, and this will have a bearing upon the housing requirement.

Question 6: Do you think the HMA boundary is broadly right? If not, how and why do you think it should be changed?

- 4.10 In the present Local Plan, the Borough is divided into two Housing Market Areas:
- Southern Test Valley which relates to the urban areas of the Solent and includes the historic town of Romsey; and
 - Northern Test Valley which is a much larger area comprising the rural hinterland of the Borough and the main urban area of Andover.
- 4.11 The characteristics of these areas are unlikely to have changed significantly, but the spatial approach to distributing development needs further consideration and we comment on this in Question 7. In response to Question 7 we discuss the distribution of development

Question 7: Are there any other approaches to distributing development across the Borough that we should consider?

- 4.12 The current distributional strategy effectively distributes development two thirds to Northern Test Valley and one third to Southern Test Valley. 60% of new housing is directed towards Andover, 30% towards Romsey and 10% to the rural area.
- 4.13 Whilst both Andover and Romsey are designated as main centres, Andover is clearly the pre-eminent settlement in the Borough as explored in Section 3 of these representations.
- 4.14 Andover should continue to be the focus of new development and because of its distinguishing features compared to the historic town of Romsey, it is better suited to accommodate an increased proportion of new development over the longer term.

Question 10: Do you think we should continue with seeking up to 40% of new homes to be affordable, or should we change the percentage?

- 4.15 The new Local Plan will need to include a policy for the proportion of affordable housing that will be sought from new development. Paragraph 62 of the NPPF requires that policies should specify the type of affordable housing required and the definition of affordable housing in the Glossary now extends to affordable housing for rent, starter homes, discounted market sales housing; and other affordable routes to home ownership.
- 4.16 The need for affordable housing will be a matter which the Local Needs Assessment will consider and will inform the proportion of affordable housing that will be sought. In formulating a policy approach, the viability of this and other policy implications will need to be



considered.

Question 15: Should the Council change its approach and set out a requirement that certain sites should provide for the needs of such groups as the elderly?

And

Should we include a policy that requires a mix and type of housing, or should the housing market inform what mix and type of housing to build?

- 4.17 Paragraph 59 of the NPPF requires that the needs of groups with specific housing requirements are addressed.
- 4.18 Paragraph 61 states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- 4.19 It follows that the Local Plan should include provision for the identified need from different groups, drawing upon evidence from the Housing Needs Assessment. In our experience this can be met through the identification of such uses as part of a mixed tenure development.
- 4.20 Moreover, the NPPG advises that where local planning authorities do not consider it appropriate to allocate such sites to meet the needs of specific groups, they should ensure that there are sufficiently robust criteria in place to set out when such homes will be permitted and that this might be supplemented by setting appropriate targets for the number of these homes to be built.

Question 18: Should the Council establish density standards in the Local Plan?

- 4.21 Planning policies should promote an effective use of land in meeting the need for homes and other uses. However, this principle must be balanced with the need to safeguard and improve the local environment and ensure safe and healthy living conditions. This encourages a more considered approach to density than a simple blanket approach and minimum density. As with the current Local Plan, the density of individual proposals should be informed by the character of the site and its surroundings and be sympathetic to it.

Question 33: Should we continue to retain the principle of Local Gaps? Should we define specific boundaries or more general policy which aims to avoid coalescence?

- 4.22 Policy E3 of the adopted Local Plan designates Local Gaps in various locations in the Borough including Andover for the purpose of helping to define the character of settlements and in shaping the settlement pattern of an area.
- 4.23 It is important to recognise that the boundaries of these Local Gaps were drawn in the context of the development requirements that existed at the time the Local Plan was being prepared and how these could be accommodated by new allocations. In the context of a new Local Plan which has additional development requirements that need to be accommodated, Local Gap designations should be reviewed. Such designations must be consistent with sustainable development and allow for provision of sufficient homes, jobs and other essential services.
- 4.24 Such designations, which are not afforded permanence in the same fashion as a Green Belt, are



not immutable and can be subject to change or even deletion where on balance new development can be located that contributes to meeting development needs and the objective of creating a sustainable pattern of development. In those instances, considered masterplanning can ensure that the character and amenity of settlements continue to be protected.

Question 34: Should the Local Plan identify and designate Local Areas of Green Space or should this be undertaken via Neighbourhood Plans?

- 4.25 The NPPF permits both Local and Neighbourhood Plans to designate areas of Local Green Space. However, such designations must be consistent with sustainable development and complement investment in sufficient homes, jobs and other essential services. They can only be used where the green space is reasonably close to the community it serves, demonstrably special to the local community and local in character and not an extensive tract of land.

Question 44: How can the Council promote more sustainable forms of transport such as walking, cycling and public transport?

- 4.26 There is a strong inter-relationship between where new development is located and how sustainable forms of transport are achieved. As the NPPF advises:
- 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; and
 - the supply of large number of homes can often be best achieved through planning for larger scale development, such as significant extensions to existing towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.
- 4.27 The recent development of Andover Business Park represents a significant investment in the growth of the town. Development opportunities that capitalise on its locations adjacent to the A303 are clearly beneficial to the town's growth in the longer term and the relationship between new housing and employment is a positive factor in the location of new development. This is especially the case where new development would enable investment in the town's existing infrastructure.
- 4.28 In this context, and having regard to the characteristics of Andover described in Section 3, the majority of additional development should be located at this main settlement. The opportunity presented to the south west of the town, which is the subject of the attached Vision document, is an eminently suitable location for future development at Andover and takes advantage of the juxtaposition between existing and future employment and new housing and community facilities.



5 Conclusion

- 5.1 These representations are submitted on behalf of Hallam Land Management Limited.
- 5.2 In the context of national, sub-regional and local planning and economic policy, the Local Plan has an important role in providing additional opportunities for sustainable development to meet, as a minimum, the objective assessed need.
- 5.3 In the context of the Borough, Andover is and should continue to be the focus at which additional development will be located. This approach would accord with the NPPF's principles that support significant development being focused at sustainable locations and the opportunity afforded by the supply of a large number of homes as larger scale development as urban extensions.
- 5.4 Hallam control land to the South West of Andover which is suitable for mixed use residential led development and would be consistent with the spatial strategy for the Plan and contribute towards meeting future development needs.

*LRM Planning
September 2018*

