

Planning Policy

From: James Millard <jmillard@boyer.co.uk>
Sent: 14 September 2018 16:17
To: Planning Policy
Subject: RE: TVBC Issues and Options Consultation: Boyer on behalf of Taylor Wimpey
Attachments: 180914 TVBC Issues and Options Consultation Boyer on Behalf of Taylor Wimpey Updated.pdf

Importance: High

Dear Sir

Earlier today I submitted Representations to the above consultation on behalf of my client Taylor Wimpey. Unfortunately I have had to make some last minute amendments. I attach our updated response to this consultation. I would be extremely grateful if the representations attached to this email can replace those previously sent to you (Please see email below). I understand that the deadline for submissions is 4:30, so our revised representations are still within the open consultation period.

I apologies for any confusion this may cause and please do not hesitate to contact me should you need to discuss.

Kind regards
 James

James Millard
 Associate Director

Boyer

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From: James Millard
Sent: 14 September 2018 12:05
To: {
Subject: TVBC Issues and Options Consultation: Boyer on behalf of Taylor Wimpey
Importance: High

Dear Sir / Madam

I am instructed by my client, Taylor Wimpey, to submit representations in response to the Test Valley New Local Plan Issues and Options consultation. Accordingly, please find attached our Representations.

If you have any questions on our Representations then please do not hesitate to contact me directly.

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

Kind regards

James

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TVBC Local Plan

Issues and Options Consultation

Boyer

Report Control

Project: Test Valley Local Plan Issues and Options
Client: Taylor Wimpey
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1	13.09.18	Draft	Alistair Macdonald
2	14.09.18	Final	Alistair Macdonald

1. INTRODUCTION

- 1.1 On behalf of our client, Taylor Wimpey, Boyer is instructed to submit representations in response to the public consultation on the Test Valley Borough Council New Local Plan Issues and Options document.
- 1.2 In support of our Representations we also attach, as an Appendix, The Finkley Down Farm Development Framework Document (September 2018).
- 1.3 It is understood that the current consultation is the first stage in the preparation of the New Local Plan for Test Valley and as such it does not seek to address specific issues such as the overall scale of development, the spatial distribution of future growth and the suitability of sites. Notwithstanding, the Development Framework Document is submitted in order to provide information regarding the potential for land at Finkley Down Farm to deliver a suitable and sustainable development opportunity for consideration in the ongoing preparation of the New Local Plan.
- 1.4 As explained, the Development Framework Document has been prepared as a live document and will be updated as the Local Plan Review progresses. It summarises the up-to-date baseline conditions, referencing specific studies and reports. The full suite of technical baseline information can be made available upon request.
- 1.5 Our comments are set out in response to specific questions for ease of reference.

2. QUESTION 3

What should the Local Plan aspirations be for the next 20 years?

- 2.1 The New Local Plan for Test Valley should be based on the requirements of the 2018 National Planning Policy Framework (NPPF) as set out at Section 3. Specifically, providing a positive vision for the future of the Borough and a strategic framework for addressing the housing needs and other economic, social and environment priorities, set within the context of the achievement of sustainable development.
- 2.2 The New Local Plan should be based on a set of strategic policies which determine the pattern, scale and quality of development. The Strategic Policies should make provision for sufficient housing (including affordable) alongside employment uses and community and social infrastructure. The delivery of housing and employment should be informed by infrastructure requirements that are necessary to facilitate future growth at the scale proposed.
- 2.3 The New Local Plan should identify the number of new homes needed, with strategic policies prepared to deliver the identified need, using the standard method set out in national planning guidance. The 2018 Framework retains the overarching objective to significantly boost the supply of new homes and it is therefore essential that the New Local Plan is based on an evidence base that ensures that a sufficient amount and variety of land can come forward in locations that will respond positively to genuine opportunities to deliver sustainable patterns of development.
- 2.4 To this end, the Borough Council should have a clear understanding of the land available through the preparation of a Strategic Housing Land Availability Assessment. Paragraph 5.11 of the Issues and Options consultation document refers specifically to the Test Valley Strategic Housing and Economic Land Availability Assessment (SHELAA) 2017. It is understood that this will be updated annually in order to ensure that it provides an up to date evidence base to inform the preparation of the Local Plan, providing information on the land available, both in terms of strategic sites as well as smaller scale development opportunities.
- 2.5 On behalf of Taylor Wimpey, representations to the 2017 SHELAA were submitted in October 2017 in respect of land at Finkley Down Farm, SHELAA Reference 165. Land at Finkley Down Farm is promoted as an extension to the Augusta Park development which was granted planning permission in 2008 for 2,500 dwellings, employment, schools, local centres, playing fields, parking and open space. At the end of March 2018 1,574 properties were occupied at Augusta Park with the balance of consented development to continue to deliver at pace (circa 215 dwellings per year) over the next four years.

- 2.6 The proposals for development at Finkley Down Farm provide a unique opportunity to benefit directly from the infrastructure improvements and enhancements associated with Augusta Park, delivering a logical and coherent extension to this development. In doing so, creating a sustainable extension to the Augusta Park development. This integration with existing development will support a scale of development commensurate with the role and function of Andover and therefore provide a highly sustainable and accessible development making best use of existing infrastructure.
- 2.7 In support of our representations to this Issues and Options consultation, and to inform the SHELAA and future updates, a Development Framework Document for proposals at Finkley Down Farm has been prepared and is provided as part of our response to this current consultation. The Development Framework Document explains the sustainability and deliverability of the site for residential development to the east of Andover, as an extension to the East Anton (Augusta Park Development), providing evidence that supports the inclusion of this site as a future allocation through the Local Plan Review.
- 2.8 In the wider context, Paragraph 60 of the Framework confirms that the Local Plan should be informed by a local housing need assessment, conducted using the standard methodology, as set out in national planning guidance. It should be emphasised that the standard methodology will provide the minimum number of homes needed. Therefore, the standard method should not be applied as a cap or constraint on growth in excess of such requirements, particularly where such opportunities for growth would be consistent with wider objectives to be established within the Local Plan.
- 2.9 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 towns and villages. Where such opportunities are well located and designed and critically, supported by the necessary infrastructure and facilities. It is considered that the New Local Plan should be premised on the delivery of larger scale development opportunities as the primary delivery mechanism for the strategic growth requirements. Land at Finkley Down Farm would be consistent with this approach.
- 2.10 Paragraph 103 of the Framework confirms that the planning system should actively manage patterns of growth and that significant development should be focused on locations which are or can be made sustainable, where such opportunities can limit the need to travel and offer genuine choice of transport modes. Larger scale sites should deliver an appropriate mix of uses, providing high quality walking and cycling networks, in order to minimise the number and length of journeys needed for employment, shopping, leisure, education and other activities. To achieve this there should be an active and ongoing engagement with local highways authorities and infrastructure providers and operators so that sustainable transport and development are aligned.
- 2.11 Paragraph 108 of the Framework sets out criteria upon which sites which may be allocated for development should be considered, specifically in terms of ensuring that such opportunities:
- a. provide appropriate opportunities to promote sustainable transport modes;

- b. provide safe and suitable access to the site for all users; and,
 - c. ensure that any significant impact from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 2.12 Paragraph 109 of the Framework confirms 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.
- 2.13 It is therefore essential that the New Local Plan is supported by a robust evidence base, including appropriate transport modelling, taking into account appropriate and deliverable mitigation, ensuring future growth scenarios and associated spatial distribution are appraised in terms of their cumulative impact. Such modelling should identify existing pressures and constraints alongside possible mitigation that would support additional development, particularly in the key locations at the main settlements in the Borough, including Andover.
- 2.14 Paragraph 117 of the Framework confirms that Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously developed ('brownfield') land. This emphasis on brownfield land forms an important part of the strategy set out in the Framework. However, the development of brownfield land should be carefully managed to ensure that such land/sites, which have potential for additional employment use, should not be lost unless there is a genuine justification that the existing or employment potential of such sites/land will not be realised. This should be based on an updated assessment of employment land, and in terms of existing provision and future demand associated with employment/job growth projections, this will include opportunities for alternative employment uses, intensification of use as well as providing sufficient land capacity for churn of sites. This is confirmed at paragraphs 120 and 121 of the Framework.
- 2.15 The Framework recognises that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Paragraph 124 confirms that good design is a key aspect of sustainable development. The Local Plan should therefore set out a clear design vision and expectations, based on the requirements of paragraph 127 of the Framework.
- 2.16 Section 15 of the Framework requires planning policies and decisions to contribute to and enhance the natural and local environment. This is to be achieved by protecting and enhancing valued landscapes, sites of biodiversity or geological soils. The planning system should recognise the intrinsic character and beauty of the countryside and great weight should be given to conserving and enhancing landscape and the scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty.

- 2.17 The preparation of the New Local Plan should therefore be focused on identifying the need for growth over the Plan period, based on a robust evidence base. The delivery of future growth should be set within the context of achieving sustainable development as explained at Section 2 of the Framework. Paragraph 8 of the Framework sets out the three objectives of sustainable development all of which should be delivered through the preparation and implementation of plans and the application of policies in the Framework.
- 2.18 Proposals for development at Finkley Down Farm, as explained in the supporting Development Framework Document, provide a genuine development opportunity to deliver significant growth in a manner that is consistent with the overarching objectives of the Framework. Through the Local Plan Review, the proposals at Finkley Down Farm can evolve to ensure that development at this location delivers a sustainable pattern of development and provides an effective and deliverable response to identified need and wider strategic objectives.

3. QUESTION 4

Should the Local Plan's housing requirement be consistent with the Government's standard Methodology? Do you have any evidence to support your view?

- 3.1 Section 5 of the Framework (Delivering a sufficient supply of homes) confirms that to determine the minimum number of new homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance (paragraph 60). It should only be the case that a local planning authority departs from this approach where there are "exceptional circumstances" to justify an alternative approach (paragraph 60).
- 3.2 The 'Planning for the right homes in the right places' consultation (September 2017) sets out the Government's approach to the standard methodology. This consultation included a 'Housing need consultation data table'. For Test Valley the indicative assessment of housing need based on the proposed formula equates to an annualised requirement of 569 dwelling (2016-2026).
- 3.3 Since the September 2017 consultation the 2016-based Subnational Population Projections (SNPP) data set for England has been published (24th May 2018). This data supersedes the 2014-based SNPP, which were published in May 2016 and inform the current standard methodology to identify housing needs. The SNPP data is a key component of the 2016-based Household Projections which are due to be published in September 2018.
- 3.4 The 2016-based SNPP show a lower than previously forecast growth in the population which is acknowledged will have an impact on the outputs associated with the standard housing need methodology. This is confirmed on the National Planning Practice Guidance (PPG) web page where it is acknowledged that the revised projections "are likely to result in the minimum need numbers generated by the method being subject to a significant reduction.". The Government remains committed to the objectives set out in the Housing White Paper (i.e. delivering 300,000 new homes per year by the mid 2020s) and as such, future adjustments to the standard method will be considered once the 2016-based household projections are published in September 2018.
- 3.5 Notwithstanding the need for adjustments to the standard method as outlined above, the Framework is clear that the standard method should be used by local planning authorities when determining need. Given that the New Local Plan is at a very early stage, any future adjustments to the standard method can be applied to future iterations of the Local Plan, ensuring consistency and conformity with the requirements of the Framework.

- 3.6 Although at the national level the 2016-based SNPP indicate a reduction when compared with previous projections, for Test Valley the latest projections actually show an increase. The 2016-based SNPP show a growth in the population of Test Valley of 9,100 people between 2016 and 2026, which compares with 7,700 people for the same period in the previous 2014-based SNPP. The latter of which forms the basis of the current requirement emerging from the standard approach, which identifies a housing need of 569 homes per year necessary to meet this demand (as noted at paragraph 5.5 of the Issues and Options consultation document).
- 3.7 Due to the revised population projections this figure is expected to increase in Test Valley to reflect the population increase as identified in the 2016-based SNPP. However, until the ONS household projections are published (September 2018) it is not possible to precisely calculate this revised minimum figure.
- 3.8 It is however possible to make informed estimates of the revised figure, based on previous population to household conversion rates and up to date affordability ratios. In doing so this would suggest that the revised housing need in Test Valley would equate to 676 homes per year (+107 per year when compared to the published figures). It must be stressed that this revised figure does not benefit from ONS data and as such should be treated with caution.
- 3.9 However, it does suggest that there is likely to be an upward pressure on the housing requirements for the Borough, particularly when compared with the current figure of 588 homes per year (2016-2029) as set out in the adopted Local Plan. Moreover, any changes to the formula are likely to be focused on ensuring that at the national level, the objective of delivering 300,000 new homes per year is achieved. The implications on those authorities, including Test Valley, where the 2016 projections depart from the national trend in terms of showing an increase, are not known, but it would not be unreasonable to assume that future adjustments to the standard method will translate to a higher need figure at the national level.

Unmet Need

- 3.10 Paragraph 60 of the Framework also requires that 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.
- 3.11 By way of example New Forest District Council (NFDC) has published a response to the current Issues and Options consultation (see Appendix 2). Within this NFDC decision it is explained that when applying the standard methodology, NFDC will not be able to accommodate the full extent of local housing need within its boundary. The Report considers that as part of the preparation of the Test Valley Local Plan that Test Valley Borough Council *"Should consider opportunities to deliver increased levels of housing to address unmet housing need arising from neighbouring areas."*

- 3.12 The shortfall at New Forest, based on the current standard method, is estimated to be in the region of 8,000 dwellings between 2016 and 2036 (400 dwellings per annum). Whilst it is not the case that Test Valley will be required to accommodate all of the projected unmet need currently identified in the New Forest, or other adjacent authorities, the message within the Framework is clear, that unmet need from neighbouring authorities should be taken into account in establishing the amount of housing to be planned for. This contribution to unmet need from neighbouring areas should be identified at the earliest opportunity to ensure the Test Valley Local Plan can identify and bring forward appropriate sites / locations for development.

4. QUESTION 5

Should the Local Plan Increase its housing requirement to help support economic growth? If yea, do you have any evidence to support this?

- 4.1 As set out at Paragraph 8 of the Framework, the economic objective to sustainable development is focused on building a strong, responsive and competitive economy. To achieve this local plans should ensure that sufficient land of the right type is available in the right places to support economic growth.
- 4.2 Paragraph 16 of the Framework is clear that Plans should be prepared positively, in a way that is aspirational but deliverable. Paragraph 80 of the Framework is clear that significant weight should be placed on the need to support economic growth, taking into account local business needs and wider opportunities for development. To achieve this planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.
- 4.3 The economic vision should be consistent with wider initiatives as set out in Local Enterprise Partnerships to ensure that the new Local Plan facilitates the delivery of economic growth and prosperity. It is noted that the current Corporate Plan for Test Valley (2015-2019) deals specifically with economic objectives and makes explicit reference to the EM3 Local Enterprise Partnership in pursuance of their strategic aim to "unlock Andover's latent economic potential. Consultation on the new Corporate Plan is underway and specific regard should be had to it once it is published, ensuring a holistic approach to wider economic objectives.
- 4.4 Paragraph 3.21 of the Issues and Options consultation document identifies that 42% of residents (24,993 people) in Test Valley work outside the Borough. Of all the workers within the Borough 40% (22,985 people) come from outside Test Valley. Set within this context, supporting economic growth will also provide opportunities to improve the self-containment of the Borough and individual towns, providing opportunities for residents to live and work in the same location, which will contribute to the wider objectives of achieving sustainable development.

5. QUESTION 6

Do you think the HMA boundary is broadly right? If no, how and why do you think it should be changed?

- 5.1 The current Housing Market Area is consistent with the evidence base prepared in support of the current local Plan, principally the Strategic Housing Market Assessment. This should be updated to ensure that the HMA boundary remains appropriate.

6. QUESTIONS 7 AND 8

Q7: Are there any approach to distributing development across the Borough that we should consider?

- 6.1 See response to Question 8

Q8: Do you have any comments on the approaches suggested above?

- 6.2 The Issues and Options consultation document sets out 5 options for the distribution of development across the Borough. The current development strategy is to concentrate development to the existing main settlements where services and jobs are most accessible. The spatial distribution of development in the current Local Plan is guided by a settlement hierarchy, which identifies the most sustainable towns and villages (based on their provision of facilities and ease of accessibility to services).
- 6.3 Andover and Romsey are identified as major centres as they have the widest range of facilities and this is reflected in the scale of growth proposed at each settlement as a component of the overall housing requirement. For Andover, the provision of 6,444 homes equates to circa 61% of the total housing requirement.
- 6.4 Andover remains the most sustainable settlement in the northern Test Valley Area and therefore should continue to be the most appropriate location for additional growth through the Local Plan Review. Paragraph 3.2 of the Issues and Options consultation document identifies that 65% of Test Valley's residents live in Andover and Romsey. In terms of affordability, paragraph 3.6 of the Issues and Options consultation document identifies that the inability to afford to buy housing without subsidies is highest amongst residents in and surrounding Andover (at 40.4%).
- 6.5 Paragraph 70 of the Framework confirms 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 towns or villages. In this context, given the role and function of Andover as the Borough's main settlement and its capacity to accommodate growth at the strategic scale, it is considered that the New Local Plan spatial distribution strategy should have, at its heart, an emphasis on new strategic allocations at Andover.
- 6.6 In doing so this will ensure that the Local Plan actively manages patterns of growth by focusing significant development at locations which are or can be made sustainable, building on opportunities to limit the need to travel and offering genuine choice of transport modes to access services and facilities.

- 6.7 The Finkley Down Farm Development Framework Document submitted as part of our representations to this Issues and Options consultation, demonstrates how strategic development can be accommodated at Andover. Specifically in the context of proposals as an extension to Augusta Park, land at Finkley Down Farm will promote and encourage sustainable transport choices due to the availability of public transport and pedestrian and cycleways. This will facilitate connections to key destination locations within the immediate locality and Andover Town Centre.
- 6.8 Integration of land at Finkley Down Farm to the Augusta Park development will ensure that additional development can take advantage of recently completed infrastructure improvements associated with the Augusta Park Development. In doing so, this will minimise disruption to users of the existing transport network in Andover and critically, it further encourages the non-use of the motor car from the outset.
- 6.9 Local Plan allocations are considered a central component of the Local Plan Review that will ensure a significant proportion of future growth requirements are delivered. The focus at the main towns in the Borough, specifically Andover, will provide continued support to the role and function of these settlements, and facilitate wider improvements to the infrastructure provision of the towns through the delivery of sustainable strategic development.
- 6.10 The focus on strategic allocations does not render wider opportunities for development redundant, in terms of directing growth at lower tier settlements. The delivery of strategic and non-strategic growth, reflecting the settlement hierarchy and role and function of settlements, are complementary and necessary to ensure that housing (and employment) growth is provided for throughout the Borough.
- 6.11 The 'community led distribution' is consistent with the Localism agenda and provides local communities with the opportunity to shape their surroundings. Paragraph 65 of the Framework confirms that strategic policies should set out requirements for designated neighbourhood areas, consistent with the overarching spatial strategy. It is acknowledged at paragraph 5.19 of the Issues and Options consultation document that not all parishes have chosen to take part in the community-led development process. Therefore a distribution strategy premised principally on a community-led approach has inherent risks to delivery. There is no certainty that parishes/communities will want to undertake or complete the neighbourhood plan process which poses risks to overall delivery.
- 6.12 A proportionate distribution to parishes is not supported on the basis that this would be a simple pro-rata split reflecting the population of settlements. This does not take into account the level of services and facilities at individual settlements or the capacity of such settlements to accommodate growth, in the context of preserving the quality and character of such settlements and their natural, historic and built environment.

- 6.13 The creation of garden villages provides opportunities to deliver significant levels of growth alongside the necessary infrastructure, set within the principles of 'garden villages'. As such, garden villages can provide a positive response to identified need. However, there are often significant delays resulting from the need to comprehensively plan for this scale of development and associated infrastructure. Garden villages have the potential to contribute to the wider strategic objectives and deliver significant levels of growth, as part of a wider spatial strategy that supports the role and function of existing settlements by directing growth at a scale commensurate with their existing position in the settlement hierarchy.

7. QUESTION 9

How should settlement boundaries be defined in the next Local Plan?

- 7.1 The geographical illustration of policies cannot be established in a supplementary planning document, as it is necessary for the location of settlement boundaries to be shown on the Local Plan Policies Map at the point of adoption. Therefore Settlement Boundaries should in an appropriate Development Plan Document, either through the Local Plan or subsequent DPD.
- 7.2 Drawing settlement boundaries around physical boundaries seems to be an appropriate starting point. There is likely however to be instances where physical boundaries are not the most appropriate, for example large areas of curtilage on the edge of settlements, and boundaries may need to be drawn through these. It is important that local knowledge is used when redrawing boundaries as setting and character of an area can be important to how limits of settlements are perceived. It is also important to recognise that when considering development proposals, other material considerations beside settlement boundaries should be taken into account including the form and character of the proposed development and its relationship to the wider area.

8. 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?

- 8.1 It is recognised within the Issues and Options consultation document (paragraphs 5.31 to 5.35) that house prices in Test Valley are more than 10 times average annual earnings. The current housing strategy seeks to deliver 200 affordable homes each year.
- 8.2 Paragraph 64 of the Framework confirms that where major development is proposed, planning policies and decisions should expect at least 10% of homes to be available for affordable home ownership, unless this would exceed the level of affordable housing required in the area.
- 8.3 The future policy requirements for affordable housing should be informed by an up to date assessment of housing need and a comprehensive analysis of the viability implications associated with future policy requirements.
- 8.4 It is noted that paragraph 3.6 of the Issues and Options consultation document refers to the 2014 Strategic Housing Market Assessment, which identified that 38.4% of Test Valley residents are unable to afford to purchase their own home, with the affordability issue at its highest in and surrounding Andover (at 40.4%).
- 8.5 The 2014 Strategic Housing Market Assessment should be updated to support the New Local Plan as it advances towards adoption. This will provide a sensitivity test to the current objective of 200 affordable homes per year and critically, identify those locations/areas within the Borough where the inability to afford to buy housing without subsidies is highest. This will provide direction and focus to policies in terms of the overall spatial distribution to ensure that housing need is met where it arises.
- 8.6 The approach of extant policy COM7 (Affordable Housing) is broadly supported in terms of providing flexibility to the application of the current 40% requirement, specifically in terms of taking into account the suitability of sites for affordable housing in terms of size, suitability and the economics of provision.
- 8.7 The Planning Practice Guidance confirms that Local Plans should set out contributions expected from development, to include setting out the levels and types of affordable housing provision. This should be informed by affordable housing need and a proportionate assessment of viability, that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy. Affordable housing requirements should be expressed as a single figure rather than a range. (Paragraph: 001 Reference ID: 10-001-20180724 – Rev Date: 24 07 2018).
- 8.8 The Local Plan should therefore be informed by a viability assessment and should not compromise sustainable development. Such assessment should ensure that policies are realistic and that the total cumulative costs of all relevant policies will not undermine deliverability of the plan.

- 8.9 With regards to affordable housing, the PPG is clear that this should be set at a level that takes account of affordable housing and infrastructure needs and allows for development to be deliverable, without the need for further viability assessments at the decision-making state. (Paragraph: 002 Reference ID: 10-002-20180724 Rev Date: 24 07 2018)
- 8.10 The PPG confirms that it is important to consider the specific circumstances of strategic sites and that plan makers should engage with landowners, developers and infrastructure and affordable housing providers to secure evidence on costs and values to inform viability assessments of specific strategic sites at the plan-making stage.

9. QUESTION 11

What should the trigger be for seeking affordable housing?

- 9.1 The trigger for affordable housing should be based on an assessment of the viability implications to include the cumulative impact of all policy requirements in the Local Plan.

10. QUESTION 13

How should we meet the requirement for Self Build Plots? Should it be part of sites over a certain threshold or separate sites?

- 10.1 The Self Build and Custom Housebuilding Act 2015 places a duty on Councils to keep a register of individuals and groups who are seeking to bring forward a self-build project. This register is intended to establish the demand for such plots within Test Valley.
- 10.2 The type of plots that are of interest should be specified in the Register, in order to understand the type / location of plots sought. It should be recognised that there is a significant difference between those who may wish to build their own home on a standalone plot on the edge of a rural settlement and a plot that forms part of a larger residential development. It is therefore essential that any future policy requirement is consistent with the evidence base and does not impose policy burdens that are not supported by appropriate evidence. This is consistent with paragraph 61 of the Framework.
- 10.3 The implications of imposing specific requirements for self-build plots as part of a larger development should also be assessed in terms of the potential impact on the overall viability, deliverability and place-shaping agenda. This is of particular relevance to future strategic allocations, as sites which will be critical to the overarching objectives to be set out in the New Local Plan. A future policy that encourages the provision of self-build plots, rather than impose a specific requirement, subject to the site specific circumstances would provide a more pragmatic and responsive policy framework within which appropriate self-build plots can be brought forward. This would be consistent with the National Planning Practice Guidance (Paragraph: 025 Reference ID: 57-025-201760728)
- 10.4 The practicalities of delivering self-build plots should also be considered. As a major national housebuilder, Taylor Wimpey take health and safety extremely seriously and implement strict health and safety procedures to ensure the safety of their staff, contractors and the public. There is genuine concern that it would be extremely difficult to manage and maintain these high standards with third parties working on their developments. Consequently, where self-build plots are required, the release of such plots should be carefully considered so as to not undermine the rigours health and safety procedures associated within the development of major sites.

11. 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 elder?

- 11.1 Within the Framework (Section 5: Delivering a sufficient supply of homes) it is explained that the local housing needs assessment (based on the standard method) should be articulated through Strategic Policies and within this context the size, type and tenure should be reflected in planning policies. This should include, but not be limited to, those who require affordable housing, families with children, older people with disabilities, service families, travellers, people who rent their homes and people who wish to build their own homes. It is considered that national requirements on space standards are the most appropriate. Using these ensures that if national policy changes the Local Plan will not become out of date.
- 11.2 At the strategic level it is therefore necessary for the needs of particular groups to be identified. The extent to which specific sites will be required to contribute to such needs will be dependent upon their scale, location and speed of delivery.
- 11.3 Strategic Sites are those which will deliver a significant proportion of planned development and as such their scale provides opportunities to deliver mixed and inclusive communities, set within the context of overall viability/deliverability, ensuring that the cumulative costs of all relevant policies does not undermine the deliverability of the site and Plan.
- 11.4 Specific allocations within the Local Plan, to provide for identified need, can provide a deliverable and pragmatic response as part of the wider strategy to address underlying need arising from within the Borough. This could include sites for specialist accommodation for the elderly and student development, in locations which are appropriate for their intended use, where they have good access to local services and facilities and will form part of an established community. The need for such provision should be clearly identified within the Local Housing Needs Assessment and future updates to the Strategic Housing Market Assessment. Such an approach can be complementary to delivery of such provision at larger strategic sites as a component of the planned development.

12. QUESTION 16

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?

- 12.1 It forms part of the 'social objective' that planning policies and decisions should support strong, vibrant and healthy communities, to include a range of homes that will meet the needs of present and future generations. Paragraph 61 of the Framework explains that local housing need assessments should identify the size, type and tenure of housing need for different groups within the community and that this should be reflected in planning policies.
- 12.2 Specific policies that require a mix of housing are therefore justified, in terms of a strategic policy, responding to relevant evidence. However, we would caution against overly prescriptive policies for individual sites/allocations. Development proposals should respond positively to identified need, informed by and having regard to local evidence, including a Strategic Housing Market Assessment. However, there should be appropriate flexibility within any future policy to ensure that strict adherence to the SHMA is not the basis upon which decisions are made. Where future development proposals can demonstrate compliance with wider objectives in terms of the delivery of mixed and inclusive communities, by providing a range of house types and sizes, in a manner that responds positively to identified need and is deliverable and viable in the context of the cumulative impact of all policies within the Local Plan, this should be sufficient.

13. QUESTION 18

Should the Council establish density standards in the Local Plan?

- 13.1 Paragraphs 122 to 123 of the Framework deal specifically with achieving appropriate densities, set within the overarching objective that planning policies and decisions should support development that makes efficient use of land. Paragraph 122 sets out criteria which should be taken into account, including: the identified need for different types of housing and the availability of land; the need to maintain the prevailing character and setting; and the importance of securing well-designed, attractive and healthy places.
- 13.2 Paragraph 123 of the Framework deals specifically with circumstances where there is an existing shortage or anticipated shortage of land. In such circumstances local planning authorities should consider the use of minimum density standards. It is not considered that such circumstances would exist within Test Valley and therefore the use of minimum density standards is unlikely to be necessary.
- 13.3 It is noted that paragraph 5.30 of the current Local Plan states that the density of individual proposals should be informed by the character of the site and its surroundings and be sympathetic to it. This is considered to be an appropriate approach and ensures that individual proposals provide an appropriate overall density, including a range of densities within the development area, which is suitable and appropriate to its physical context and wider setting.

14. QUESTION 19

Do you think we should establish internal space standards for future homes?

- 14.1 Section 12 of the Framework is concerned with achieving well-designed places, with paragraph 127(f) confirming that planning policies and decisions should create places that are safe, inclusive and accessible and which promote health and well-being, within a high standard of amenity for existing and future users. Footnote 46 of the Framework confirms that policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified.
- 14.2 It is considered that national requirements on space standards are the most appropriate. Using these ensures that if national policy changes the Local Plan will not become out of date
- 14.3 The National Planning Practice Guidance explains that where a need for internal space standards is identified, local planning authorities should take into account the need for such standards, the viability implications and the timing for the implementation of such standards.
- 14.4 Therefore should it be the case that the New Local Plan will impose internal space standards, this should be supported by an appropriate evidence base. The use of internal space standards is considered to represent an overly prescriptive policy burden on new development and implies that a single standard is appropriate for all types of development. There is also the concern that in setting a minimum standard this may result in a scenario whereby such standards become the norm at the expense of larger and more generous properties.

15. QUESTION 20

Do you think we should establish standards for accessible, adaptable and wheelchair user dwellings?

- 15.1 Paragraph 61 of the Framework requires local planning authorities to plan for the housing need of different groups in the community, which includes those people with disabilities. Where there is an identified need for such properties, planning authorities should make use of the Government's optional technical standards for accessible and adaptable housing.
- 15.2 The Planning Practice Guidance (Paragraph: 007 Reference ID: 56-007-20150327 Revision date: 27 03 2015) confirms that based on their housing needs assessment it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings) of the Building Regulations.
- 15.3 Local Planning authorities, through the Local Plan, should clearly state what proportion of new dwellings should comply with these standards. This should be based on up to date evidence and considered in the overall context of viability for sites, taking into account the cumulative impact of all policies within the Local Plan.
- 15.4 We question whether it is appropriate for planning policy to impose standards which are a matter for Building Regulations.

16. QUESTION 23

Do you agree that we should have a specific policy on health and wellbeing? What sort of issues do you think it should cover?

- 16.1 It is difficult to understand how a specific policy on health and well-being can be constructed which would make it distinct from other policies to be contained within the Local Plan. Section 8 of the Framework (Promoting healthy and safe communities) identifies healthy, inclusive and safe communities as those which:
- Promote social interaction, through the creation of mixed-use developments, with strong neighbourhood centres, and easy pedestrian and cycle connections between neighbourhoods and developments with active street frontage;
 - Provide safe and accessible developments, reducing crime and disorder with clear and legible pedestrian and cycle routes, and high quality open space;
 - Enable and support healthy lifestyles, through the provision of green infrastructure, sports/recreation facilities, high quality open space, allotments and layouts that encourage walking and cycling.
- 16.2 Health and well-being forms part of the holistic planning process whereby individual sites / development locations, through the masterplanning process, respond to and deliver high quality developments that incorporate the objectives / principles as set out above. This will reflect site specific circumstances and the opportunities presented by individual developments as part of the overall critical mass, but also their ability to integrate and connect with neighbouring communities / infrastructure.
- 16.3 The delivery of healthy and safe communities is the collective sum of individual elements of the masterplanning / design and planning process. We therefore question whether a specific policy on health and wellbeing would be necessary, given that this forms part of the overall strategic objectives in terms of delivering sustainable development and the objectives of the Framework when read as a whole.

17. QUESTION 26

Should we allocate more land to enable more choice and flexibility to the market?

- 17.1 It is understood that the current Local Plan allocates 20.5ha of land for employment development. The scale and location of additional land required through the Local Plan Review will need to be identified through updates to the existing evidence base. The continued protection of existing employment locations alongside policies which support their intensification / expansion (where appropriate) is likely to form an important part of the employment strategy going forward.
- 17.2 The role and function of individual settlements should play an important factor in the locational requirements for additional employment land, ensuring that the Borough's main settlements continue to provide the economic hub for the plan area. This should be supported by appropriate increases in housing and improvements to infrastructure to support the continued growth of the boroughs' main towns.

18. QUESTION 33

Should we continue to retain the principle of Local Gaps? Should we define specific boundaries or a more generalised policy which aims to avoid coalescence?

- 18.1 The purpose of Local Gaps is defined in current policy E3, with the two principal objectives being to ensure that development does not diminish the physical and/or visual separation; and, development would not individually or cumulatively compromise the integrity of the gap.
- 18.2 Should Local Gaps be retained as a policy tool in the New Local Plan, such designations should be justified, based on appropriate and robust evidence. This should identify land that performs an important role in protecting the setting and separate identity of settlements and to avoid coalescence. Informed by assessments that consider land-uses, settlement character, landscape character, environmental and historic designation and public routes providing views in and out of the countryside and an understanding of the vulnerability of settlements to coalescence. This should also include the extent of existing development and separation distances between urban areas and outlying settlements.

19. QUESTION 34

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

- 19.1 Paragraphs 99 to 101 of the Framework explains the justification and approach to Local Green Space, which can be designated through the local or neighbourhood plan. When designating Local Green Space this should be consistent with the local plan objective of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should be capable of enduring beyond the plan period. In this regard it would be appropriate to consider Local Green Space designations alongside other strategic land use policies to ensure there is consistency in approach and any such designations do not prevent the wider objectives of the Local Plan in terms of accommodating sufficient land for new homes, jobs and infrastructure over the Plan period.
- 19.2 Where a Neighbourhood Plan is being prepared post adoption of the Local Plan, there is nothing in the Framework which would prevent local communities from designating land as a Local Green Space, provided it is consistent with the Local Plan. The designation of Local Green Spaces in the Local Plan therefore does not prevent Neighbourhood Plans from also promoting land for such designation.
- 19.3 Given that once designated, Local Green Spaces will enjoy the same level of protection as the Green Belt, it is critical that the strategic aspirations/objectives of the Local Plan are not constrained by such designations in the period up to the point of adoption of the Local Plan.

20. QUESTION 35

Should the next Local Plan continue to promote water efficiencies from new developments?

- 20.1. Current policy E7 (Water Management) sets out policy requirements to ensure the efficient use of water. Paragraph 149 of the Framework requires plans to take a proactive approach to mitigating and adapting to climate change, which includes measures related to water supply so as to ensure the future resilience of communities and infrastructure.
- 20.2. Even though the question refers to water efficiency, paragraphs leading to it (Page 24/25) discuss both water supply and water quality. It states that *'the water quality of water bodies within the Borough is generally moderate to good based on the most recent assessment by the Environment Agency'*. Furthermore, it states that *'It will be important to ensure this position does not deteriorate, and where possible, opportunities are taken for improvement'*.
- 20.3. Therefore, the promotion of policies within the Local Plan to improve potable water efficiency within all new developments and policies to protect the water quality of local water bodies from potential runoff from new developments can be considered as very pragmatic. These Local Plan policies should aim to promote appropriate measures, taking into account site specific circumstances, technical considerations and overall viability, in order to achieve a reduction of potable water consumption and the use of sustainable urban drainage systems (SUDS) minimise the surface water discharges from new development sites into local water bodies.

21. QUESTION 38

Should the Local Plan encourage energy efficiency when constructing new development?

- 21.1 Specific energy requirements for new housing development are a matter for Building Regulations. There are no optional standards set out in national guidance. We question whether any such policy to "encourage" energy efficiency is necessary given the need for new development to adhere to Building Regulations requirements. The concern would be that such policies may require an applicant to comply with an energy efficiency standard that exceeds that required by Building Regulations which would not be justified. It is not the role of planning policy to perform this function.

22. QUESTION 39

How can we improve design quality within the Borough?

- 22.1 Paragraph 12 of the Framework confirms that high quality places is fundamental to what the planning and development process should achieve and it reiterates the Government's position that good design is a key aspect of sustainable development.
- 22.2 There is a requirement in the Framework (para 125) for plans, at the most appropriate level, to set out a clear design vision and expectations. In doing so this will provide applicants with certainty about what is likely to be acceptable. The Framework does not state that such expectations must be set out in the Local Plan. Whilst it is possible for Local Plans to perform this function, para 126 of the Framework notes that this could also be addressed in supplementary planning documents.
- 22.3 It is considered that it would be too prescriptive of the Local Plan to set out specific policy requirements related to design. A single policy is unlikely to provide an appropriate basis that accounts for the local distinctiveness throughout the Borough, reflecting local character and vernacular etc. The concern would be that a single policy would impose a "one size fits all" approach that would fail to respond to the individual character of locations/settlements within Test Valley.

23. QUESTION 40

Should the Local Plan be specific on the type of open space to provide or should it take account of existing provision/future requirements?

- 23.1 Where sites are proposed to be allocated, specific policies / templates which set out the nature of open space (including recreation) requirements should form part of the allocations process. This should be informed by, and have regard to, existing provision (including proximity and quality) and future requirements. The scale and nature of such provision should be commensurate with the scale of development proposed. Where new developments can support enhancements to existing provision in close proximity to occupiers of the new development, this should be considered as a potential option as part of the overall open space requirements. This would be particularly relevant whereby a brand new resource may threaten / undermine an existing provision.
- 23.2 The provision of open space (including recreational) will form a key component of the objective to promote healthy and safe communities. The delivery of such provision should strike an appropriate balance between meeting this objective and ensuring that any future requirements are informed by an up to date assessment of need/demand and a comprehensive analysis of the viability implications associated with future policy requirements.

24. QUESTION 42

Should alternative open space for mitigation be provided as part of new developments or should land be specifically allocated, or a combination.

- 24.1 It is not clear whether Question 42 relates to scenarios whereby development would result in the loss of existing open space and or if it relates to open space provision to be provided as part of a proposed development. The current Local Plan recognises that open spaces should be provided as an integral part of the design and layout of development and such an approach is supported in terms of delivering high quality development that supports the health and wellbeing agenda and achieving sustainable patterns of development.
- 24.2 Where a proposal would result in a loss of existing provision, the nature of mitigation required will be dependent on the nature of the loss, and the potential mitigation strategy, in terms of on-site or off-site provision, and should be assessed on a site by site basis. Set with the overarching objective and such proposals not resulting in a net loss of existing provision.

25. QUESTION 44

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

- 25.1 Paragraph 103 of the Framework is clear that the planning system should actively manage patterns of growth and recognises that significant development should be focused on locations which are or can be made sustainable. Sustainability forms a key principle in the design of the development, with the objective to reduce the need to travel in the first instance and then to promote and encourage sustainable transport choices.
- 25.2 Where development proposals can integrate with existing sustainable transport options and provide genuine transport choices to reduce dependency on the private car, such options should be considered for growth through the Local Plan Review. Access to safe and convenient pedestrian and cycle routes, as well as the ability of new development to internalise movements by providing an appropriate mix of uses to serve day to day needs, will also support the wider strategy to promote more sustainable transport within individual settlements.

26. QUESTIONS 45 AND 46

Q46: How do you think the Council should be making provision for parking within new development?

26.1 Paragraph 105 of the Framework confirms that if a local parking standards are to be established, policies should take into account:

- a. The accessibility of the development;
- b. The type, mix and use of development;
- c. The availability and opportunities for public transport;
- d. Local car ownership levels; and
- e. The need to ensure adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

26.2 The current method of calculating parking standards appears to be empirical and prescriptive in nature. It is considered that the evidential basis for any future parking standards should be consistent with paragraph 105 of the Framework, where there is a clear emphasis on parking standards being appropriate to the type and location of development and the availability and opportunities for public transport. To impose a "one size fits all" standard would be at odds with the Framework.

26.3 Paragraph 8.13 of the Issues and Options document also notes that the number of electric cars is increasing and that future parking standards should take this into account. There is therefore some consistency with Paragraph 105 of the Framework (e). However, the cost implications associated with charging points, in terms of the impact on the overall viability of development should be identified within the Local Plan evidence base to ensure that any such requirements do not impact on the ability to develop sites viably, when considered in the context of the cumulative policy requirements. Furthermore, the ability of the infrastructure network to support charging points, whether rapid charging or "trickle charge", should be fully understood in order to determine the extent to which any future policy requirements are technically feasible and financially viable, both for infrastructure providers but also in terms of the obligations placed on new development.

26.4 To be consistent with the Framework (paragraph 106) maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary,

Q46: Do you agree with the Council's current approach or are there changes would like to see made?

See response to Question 45

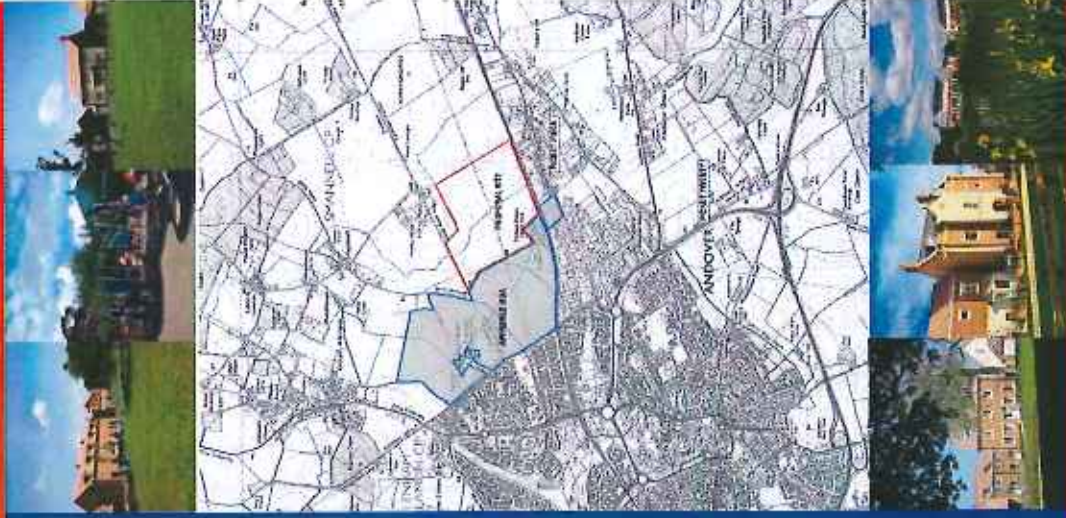
APPENDIX ONE – FINKLEY DOWN FARM DEVELOPMENT DOCUMENT

Land at Finkley Down Farm, Andover

Development Framework Document

Submitted on behalf of Taylor Wimpey UK Ltd

September 2018



**Taylor
Wimpey**

Boyer

E&A
Consulting Engineers Ltd
Sustainable Development Specialist

CSA
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waterman

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1. Introduction

1.1 This Development Framework Document (September 2018) has been prepared in support of the promotion of Land at Finkley Down Farm through the Local Plan Review. Its purpose is to explain the sustainability and deliverability of the site for residential development as an extension to the East African (Augusta Park) Major Development Area (MDA).

1.2 The new Local Plan for Test Valley will set out the Council's vision and objectives for the Borough, together with locations for development including strategic site allocations and development management policies, necessary to deliver the strategy over the plan period to 2036.

1.3 Land at Finkley Down Farm has been promoted previously through the Test Valley Strategic Housing Land Availability Assessment (SHLAA). The land is now identified in the 2018 Strategic Housing & Economic Land Availability Assessment (SHELAA), site reference: "SHELAA"66".

1.4 A comprehensive development strategy, comprising circa 1,500 new homes, a primary school, and significant areas of new landscape parkland, playing fields and allotments is proposed. The illustrative Masterplan demonstrates how development at Finkley Down Farm can connect and integrate successfully with the Augusta Park development.

1.5 In order to assess the credentials of the site and prepare the development proposals, Taylor Wimpey UK Ltd has appointed a consultant team to undertake the work associated with the promotion of this site. The project team comprises:

- **Boyer Planning**
- **CSa Environmental: Masterplanning, Landscapes, Ecology and Archaeology**
- **C&A Consulting Engineers: Highways, Flood Risk, Surface Water and Foul Water Drainage.**
- **Waterman: Noise and Air Quality.**

1.6 As summarised in this Development Framework Document, the site surveys and investigations undertaken to date demonstrate that there are no overriding constraints to development that would prevent the site from being considered suitable for development as a Strategic Allocation through this Local Plan review process.

1.7 This Development Framework Document is an update to previous versions submitted to the Council¹ and has been prepared as a live document, such that it will evolve and be updated in support of the promotion of the site through the various stages in the preparation of the New Local Plan.

1.8 The June 2018 Local Development Scheme (Figure 1) identifies the key stages and timetable for the preparation, submission and adoption of the new Local Plan. It is envisaged that the promotion of this site and the evolution of design proposals will align with the plan-making timetable, providing the evidential basis and justification for inclusion as an allocation within the Local Plan.

1.9 We welcome the opportunity to work closely with Test Valley Borough Council to develop the proposals. This process of engagement will ensure that the wider strategic objectives of the new Local Plan can be achieved, in a manner that facilitates sustainable development at this site. At the same time, supporting the growth agenda for the Borough and specifically the role and function of Andover, we are therefore pleased to submit this Development Framework Document in response to the 2018 Issues and Options consultation.

1.10 The Development Framework Document should be read in conjunction with our separate Representations submitted on behalf of Taylor Wimpey in response to consultations on the emerging Local Plan.



Figure 1: Test Valley Local Development Scheme (June 2017).



View looking east across the site from western boundary.

2. Site and Context

- 2.1 This section sets out the development site in the context of its immediate surrounds and explains the potential to integrate the future development with existing and consented neighbourhoods as a logical, coherent and sustainable extension to Andover.
- 2.2 Andover is recognised as the most sustainable settlement in the Northern Test Valley Area, and therefore the most appropriate location to allocate new housing. At the Borough-wide level, Andover, along with Romsey (Southern Test Valley), is classified as a top tier 'Major Centre' and acknowledged in the current Local Plan as being a settlement with the widest range of services and facilities.
- 2.3 Andover has seen planned expansion from its roots as a historic market town, including development at the Andover Major Development Area at East Anton, as identified in the 2006 Local Plan. More recent allocations are identified to the east of Andover on land at Picket Piece (Policy COV6) – 400 dwellings, and land at Picket Twenty (Policy COV6A) – 300 dwellings.
- 2.4 Andover's role as a focus for growth within the Borough, and specifically within the Northern Test Valley Area, is reflected in the current Local Plan whereby approximately 91% of planned development is directed towards the town. At the Borough-wide level, the current Local Plan spatial strategy directs approximately 61% of the overall housing requirement to Andover.
- 2.5 Notwithstanding the focus of development at Andover, the Issues and Options Consultation (para 3.6) notes that the inability to afford to buy housing without subsidies is highest amongst residents in and surrounding Andover (at 40.4%).
- 2.6 The National Planning Policy Framework (paragraph 70) confirms that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new development or significant extensions to existing towns or villages.
- 2.7 It is within this context that land at Finkley Down Farm is promoted as a suitable location to be included in the Local Plan Review as a Strategic Allocation.

Site Description

- 2.8 Land at Finkley Down Farm is comprised of predominantly agricultural land and occupies an area of approximately 65 ha, at the north eastern edge of Andover, to the south of Finkley Road (Figure 2).
- 2.9 The centre of Andover, together with its railway station, is approximately 3 km to the west. Neater to the land, on the eastern edge of the town, are various other facilities including employment areas, retail and secondary schools.
- 2.10 The southern boundary of the site is defined by a railway embankment with trees and scrub alongside the route of the London Waterloo to Exeter railway line. The land is dissected east to west by the route of a high voltage electricity power line. Wallworth Industrial Estate is located to the south east beyond the railway line.
- 2.11 Picket Piece and the associated Local Plan allocation is located adjacent to the southern boundary, on the south side of the railway line. The settlement of Smarnell lies approximately 1km to the north. The boundary of the North Wessex Downs Area of Outstanding Natural Beauty ('AONB') lies approximately 200m to the north east beyond Finkley Manor Farm.
- 2.12 The wider landscape, to the north and east of the site is characterised by an undulating landform, which is bisected by a number of shallow dry valleys and ridgelines which tend to follow a north to south alignment, leading from the high chalk ridge of the Downs at the northern edge of Andover.
- 2.13 The site has a distinctly domed landform with a minor ridge line crossing the site in a south westerly direction leading from Finkley Manor Farm to the north east. Finkley Down Farm Park is located in the south west corner of the site. The farm comprises a collection of farm buildings, parking areas and small fields used for animal grazing.
- 2.14 There are a number of public footpaths which run beyond Smarnell Road to the north and connect to the wider countryside. A restricted byway runs alongside the western boundary of the site. FPG runs to the north of the site beyond Smarnell Road and also cuts across the north west corner of the site.

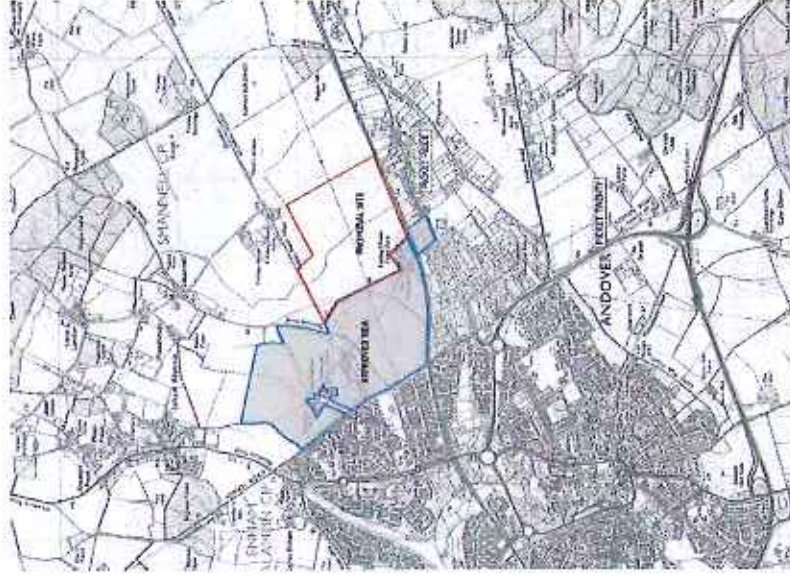


Figure 2: Site location

3. The Proposals

- 3.1 It is envisaged that development proposals will comprise up to 1,500 new homes, a primary school, significant areas of new landscape parkland, playing fields and allotments.
- 3.2 The illustrative masterplan (Figure 5) demonstrates how current proposals can be accommodated within the site and critically, how the design scheme will integrate with Augusta Park.
- 3.3 **A Sustainable Access & Movement Strategy**
Sustainability forms a key principle in the design of the development, with the objective to reduce the need to travel in the first instance and then to prioritise and encourage sustainable transport choices.
- 3.4 Development as an extension to Augusta Park promotes and encourages sustainable transport due to the availability of public transport and pedestrian and cycleways, facilitating connections to key destination locations within the immediately locality and Andover town centre.
- 3.5 This integration will support a scale of development commensurate with the role and function of Andover and ensure that additional development at Finkley Down Farm can take advantage of recently completed and planned infrastructure improvements delivered by the Augusta Park development.
- 3.6 The ability to take advantage of the accessibility improvements delivered by the Augusta Park development will minimise disruption to users of the existing transport network in Andover. Critically, with such infrastructures already in place, it further encourages the non-use of the motor car from the outset.
- 3.7 It is considered that there are no overriding highways, transportation or accessibility constraints that would prevent land at Finkley Down Farm from achieving a well-connected and sustainable development opportunity.

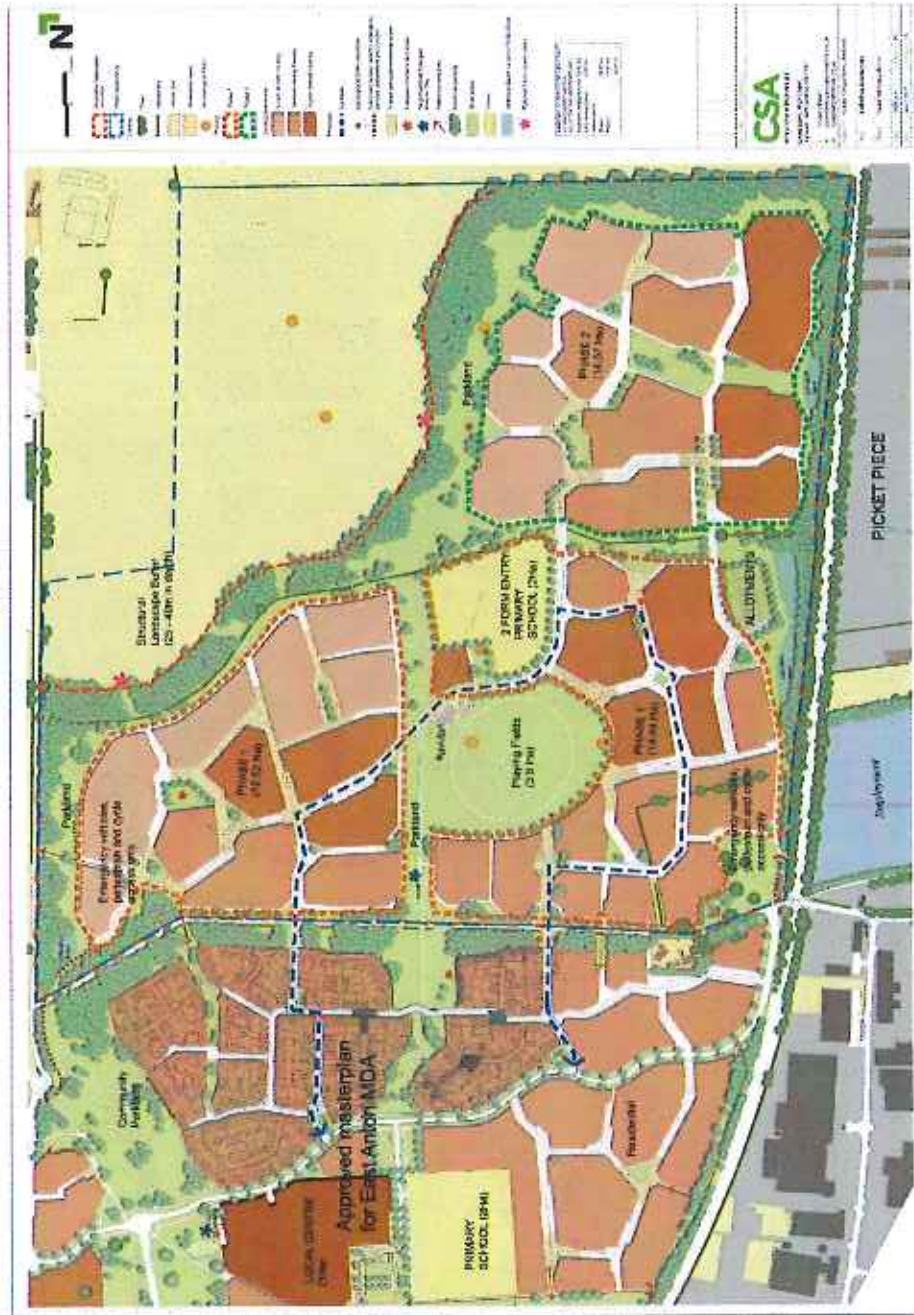


Figure 5: Finkley Down Farm Illustrative Masterplan

The Highway Network

- 3.8 The town of Andover has good connectivity to the wider area with strategic highway links to Newbury and Winchester via the A34, and south Hampshire and the coast via the A303, M3 and M27. The A303 borders the town to the south and effectively forms the southern half of a ring road around the town centre. The northern section of the ring road is formed by the A3083, A3057 and the A343.
- 3.9 The main agricultural access to the land is currently from Finkley Road which runs along the northern boundary. Vehicular access will be integrated with the adjacent Augusta Park development with two primary accesses linking into the recently constructed spine road (Finkley Farm Road), providing connections onto Smanell Road and the A343 Newbury Road to the west and via Finkley Arch onto North Way and onwards to Walsworth Road to the south. (Figure 5)
- 3.10 Secondary accesses on both the northern and southern ends of the joint boundaries are also proposed, which will provide access for emergency vehicles and pedestrian and cyclists only. (Figure 5)
- 3.11 The main highway network surrounding the site comprises the Augusta Park spine road which runs through the new development connecting the existing highway network via Smanell Road and Viking Way to the east and a north-south spine road connection (Ickstead Way to Walsworth Road). The Augusta Park spine road will also provide access to the local centres and primary schools to be provided as part of this consented development.
- 3.12 The highway works, both on site and off site, associated with Augusta Park have been completed, with the exceptions of the proposed Finkley Arch which will provide improved access between Finkley Farm Road and the employment centre to the south via North Way and Walsworth. In addition, improvements to the slip roads at the A303/A3053 site expected to be completed by the spring of 2019.
- 3.13 The locations of all highway improvement schemes associated with the Augusta Park Development and which schemes have been completed to date are shown at Figure 6.
- 3.14 Development at Finkley Down Farm will therefore benefit directly from new, high quality connections to the surrounding highway network resulting from the infrastructure recently delivered or planned as part of Augusta Park.

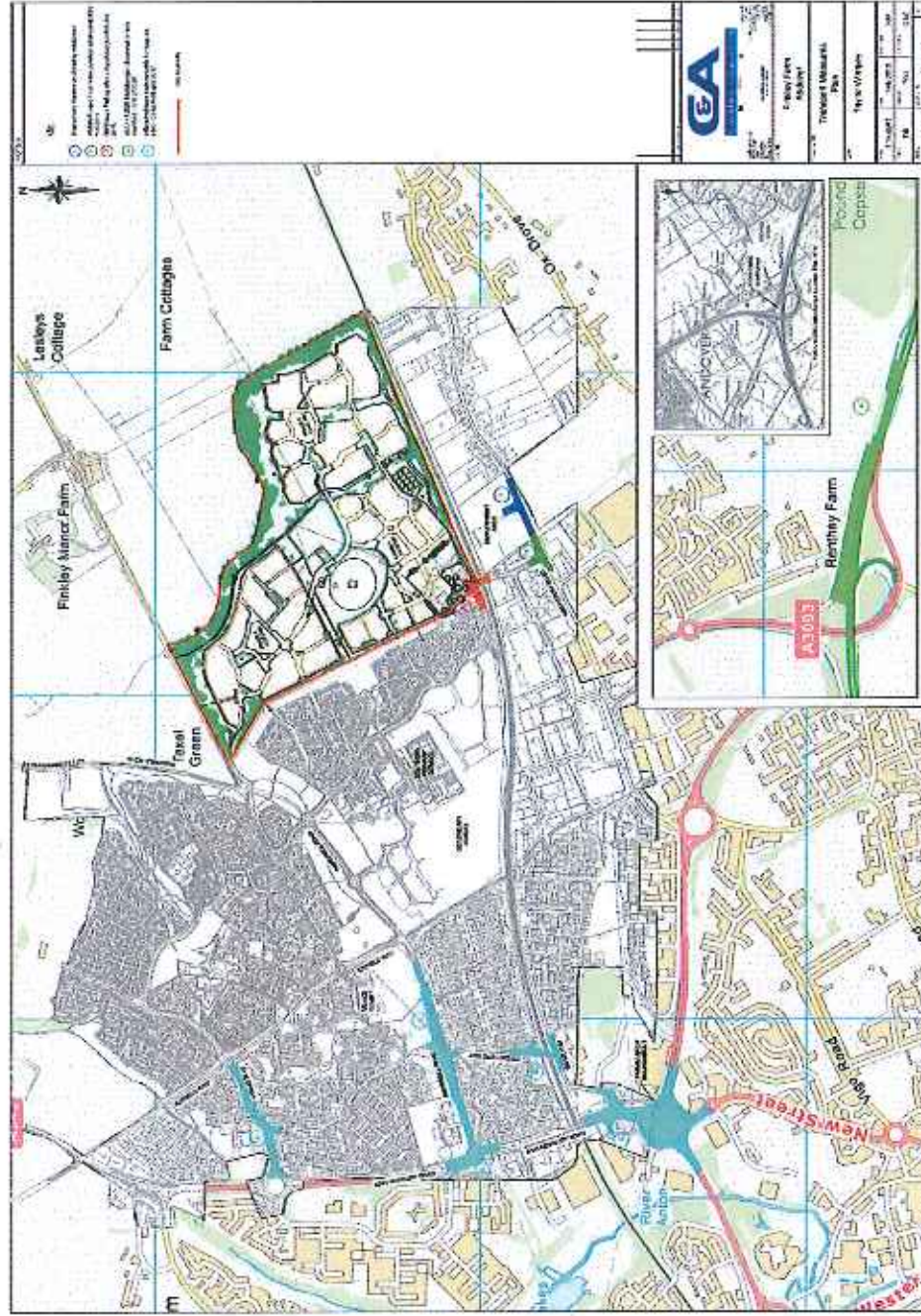


Figure 6: Transport Measures Plan

Walking and Cycling

- 3.15 The immediate network for pedestrians and cyclists from the proposed site will comprise the new infrastructure delivered by the Augusta Park development and the existing provision on the surrounding roads.
- 3.16 This represents a generous and comprehensive route network which will provide continuous and direct access to key destinations within Andover.
- 3.17 The provision provided within the Augusta Park development, comprising 2.0m wide footways and 3.0m wide footway/cycleways connecting residential areas, will support the containment of travel within the development. The ability to connect to the network associated with Augustus Park, and the existing wider network, will ensure that good accessibility to local services is achieved.
- 3.18 These links have been safeguarded in terms of standard within the construction of Augustus Park to ensure bus and cycle access can be safely maintained.
- 3.19 Figure 7 provides further details as to the off-site pedestrian and cycle infrastructure and shows the current provision including that detailed as part of the Augusta Park development. The key elements of these recent off-site pedestrian and cycle improvements are the connections along Smartell Road to the A343 Newbury Road and connection through to North Way, to Wallworth Road.
- 3.20 In this context, development at Finkley Down Farm will integrate fully to this enhanced network, resulting in direct and attractive links which encourage walking and cycling, both within the development area and on to the wider network and key destinations in Andover.

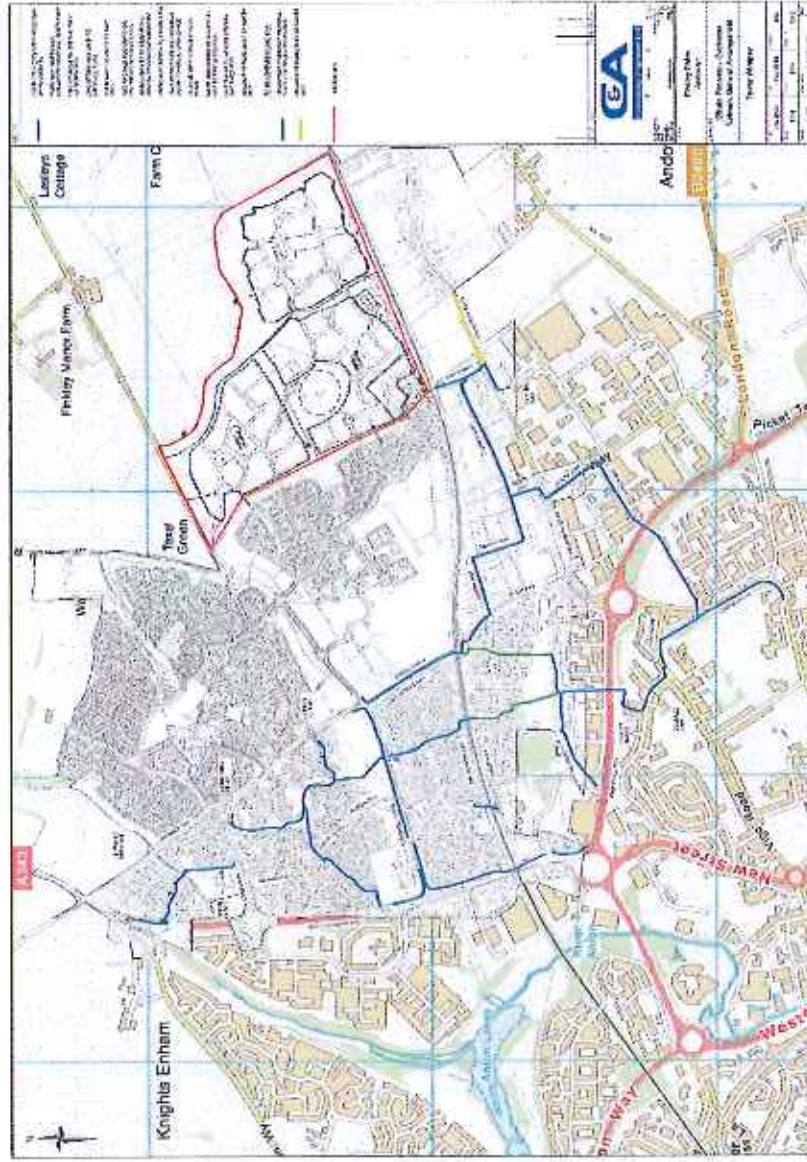


Figure 7: Off-site Footway / Cycleway Network General Arrangement

Development Proposals and Key Masterplan Principles

- 3.27 The precise quantum of development will be refined as the masterplanning process evolves, to reflect further site surveys/investigations, as well as engagement with the Local Planning Authority, other stakeholders and the local community.
- 3.28 In doing so, this will ensure that the masterplan appropriately responds to the site specific circumstances and ensure that future development reflects wider strategic requirements, including the provision of open space, as well as the need for physical and social infrastructure improvements.
- 3.29 An important consideration in the evolution of the masterplan will be the Test Valley Local Plan Review, specifically the proposed Vision and Objectives, to ensure that development at this site delivers growth in a manner that is supportive and consistent with these wider objectives.
- 3.30 As the Local Plan Review progresses this Development Framework Document will evolve in parallel in order to demonstrate the extent to which development at this site can provide a suitable and deliverable strategic development option to be identified in the Local Plan.
- 3.31 Current proposals (see Figure 5) demonstrate indicatively how development can be satisfactorily accommodated based on the following principles:
- The creation of an extension to the new community at Augusta Park comprising circa 1,520 new dwellings, 2Ha primary school site, playing fields, allotments and open space.
 - To provide a range of housing densities (30-40 dwellings per hectare), with lower density development located at the edge of the site boundaries with the open countryside. Higher densities will be concentrated along the route of the principle spine road and overlooking the playing fields. Filled development could be accommodated at the southern boundary, adjacent to the railway line, where it will mitigate noise from passing trains.
 - The creation of two new vehicular access points at the western land boundary connecting the land with development at Augusta Park.
 - To provide a new area of parkland at the mid-point of the western boundary, creating a green corridor to link the proposed playing fields at the eastern boundary with the Local Centre in Augusta Park.

- The provision of pedestrian/cycle connections to Augusta Park to ensure that both development areas are fully integrated.
- To provide a site for a new 2 form entry primary school alongside the principal bus route, with the school playing fields located alongside the boundary with the adjoining parkland.
- To provide playing fields and a pavilion building at the eastern land boundary to supplement those at the northern end of Augusta Park.
- To provide substantive areas of open space for informal recreation in the form of new parkland and a network of green corridors.
- To locate new play areas within open space as part of a coordinated play strategy.
- To retain significant trees and hedgerows within areas of open space.
- To retain, protect and improve existing habitats for the benefit of wildlife.
- To provide a significant landscape buffer, incorporating areas of parkland and new woodland planting alongside the boundaries with the open countryside in order to screen development and integrate the land into the setting of the wider area.
- To retain locations of potential archaeological interest within pockets of open space.
- To provide an integrated network of sustainable drainages that utilises existing geological conditions.

Benefits

3.32 Housing supply: The provision of approximately 1,500 dwellings will make an important and significant contribution to meeting the housing need for the Borough, and specifically for Northern Test Valley. It will provide certainty of supply for the long-term in a manner that is consistent with the role and function of Andover as the main settlement in the Borough.

3.33 Sustainable communities: The development will create an integrated extension to the new community at Augusta Park with additional facilities (e.g. 2Ha primary school site, playing fields, allotments and open space) that will benefit both the new residents and enhance the availability of choices and enjoyment to Augusta Park and existing community residents.

3.34 Housing mix: The proposals provide opportunities to accommodate a range of house types and sizes, responding positively to identified need, supporting the housing delivery of all sections of the community, including the provision of affordable housing. Thereby facilitating the achievement of a safe, mixed and vibrant community that is well integrated with existing neighbourhoods.

3.35 Open space and recreation: Current proposals incorporate playing fields and a pavilion building at the eastern boundary, along with substantial areas of open space for informal recreation in the form of new parkland and a network of green corridors. New play areas will be located within open space as part of a coordinated play strategy, with potential for allotments to be provided at the southern boundary.

3.36 Ecology: The scheme will as far as possible seek to retain, protect and improve existing habitats for the benefit of wildlife. This will include the retention of significant trees and hedgerows within areas of open space and the provision of a significant landscape buffer, incorporating areas of parkland and new woodland planting, alongside the boundaries with the open countryside.

3.37 Economic: Housing development is a key component of economic growth and the scale of development will deliver significant economic benefits throughout the construction and operational phases. Further details will be set out in due course, but it is considered that the significant economic benefits, in terms of new expenditure and job creation, as well as providing an economic workforce to support the established employment base within the town, will ensure that the economic objective of sustainable development can be delivered.

Delivery

3.38 Development at Finkley Down Farm provides a unique opportunity to provide for growth throughout the plan period, with development phased to ensure the delivery of necessary infrastructure commensurate with housing growth.

3.39 The precise delivery trajectory will be confirmed in due course. However, an indicative trajectory was set out in the October 2017 Call for Sites submission is as follows:

- 0-5yrs (2017-2022): 280 dwellings (total)
- 6-10yrs (2022-2027): 960 dwellings (total)
- 11-15 years (2027-2032) – 1,500 dwellings (total)

4. Overview of Technical Reports

Landscape

- 4.1 A Landscape Overview Report has been prepared in order to identify any landscape constraints to development at Finkley Down Farm, the findings of which are summarised below.
- 4.2 The site is not covered by any statutory or non-statutory designations for landscape character or quality. The boundary of the North Wessex Downs AONB lies approximately 200m to the north east of the land, immediately beyond Finkley Manor Farm. The North Wessex Downs AONB is a nationally designated landscape for its scenic beauty and has the highest level of protection as set out in the National Planning Policy Framework.
- 4.3 The wider landscape, to the north and east of the site is characterised by an undulating landform, which is bisected by a number of shallow dry valleys and ridgelines which tend to follow a north to south alignment leading from the high chalk ridge of the Downs at the northern edge of Andover.
- 4.4 The landscape has a well vegetated feel resulting from the proliferation of woodland blocks which are a conspicuous feature on the higher ground towards to the AONB.
- 4.5 The landscape of the Finkley Down Farm land however is relatively undistinguished comprising principally of two large arable fields. It is largely void of vegetation and has a weak landscape structure although there are a number of significant hedgerows contained at the land boundaries and at the mid-point of the land.
- 4.6 To the south, the boundary is defined by the London to Exeter railway, with development at Picket Piece extending the existing urban envelope alongside the length of the southern boundary.



View looking east across the Site from restricted byway 753 at the western site boundary



View looking south across the Site from restricted byway 753 at the northern site boundary



4.7 The Landscape Overview Report includes viewpoints from around the site as shown at Figure 9.

4.8 Views from the built up area of Andover to the west are largely unavailable owing to the topography and intervening development, however there are views from the recent development at Augusta Park.

4.9 Development at the site will impact on views from Finkley Road, however this is limited to the section of the road west of Trinley Wood. In views from vantage points along the road development will be visible as the existing urban envelope is pushed eastwards, however these views will be seen in context, with surrounding development at Watworth Industrial Estate, Picket Piece and Augusta Park currently visible in the backdrop.

4.10 Views from the south tend to be limited to the ridges at Tinker's Hill and Bere Hill. In views from the public open space at Ladies Walk to the south west, the site can be discerned over the roof tops of the new homes at Augusta Park. Accordingly, although development at the site will be discernible it will not materially impact on the character of views from this receptor.

4.11 There are opportunities for views from vantage points in Picket Piece to the immediate south of the site, between breaks in the existing urban fabric. In views from these vantage points, development will be readily perceptible within the adjoining landscape north of the railway line. Notwithstanding this, development at the site would form part of a wider urban expansion on the eastern edge of Andover, alongside development in Augusta Park, and existing and future development within Picket Piece.

4.12 The outline visual assessment identifies that opportunities to view the site from the ACNB to the north / south and the countryside to the east are limited by the undulating topography and proliferation of woodland blocks.

4.13 Accordingly, it is considered that the visual impacts on the countryside, in particular the setting of ACNB will be limited. Impacts of the proposed development can be further mitigated by the inclusion of a landscape buffer, including planting at the northern and eastern site boundaries.

Site Topography

4.14 The land has a distinctly domed landform with a minor ridge line crossing the land in a south westerly direction leading from Finkley Manor Farm to the north east.

4.15 The landform falls either side of the ridge, from a highpoint of approximately 55 AOD to 30 AOD and 75 AOD at the north western and south western boundaries respectively.

Public Rights of Way

4.16 There are a number of footpaths which run beyond Smarmel Road to the north and connect to the wider countryside. FP763 is a restricted byway and runs alongside the western land boundary. FP713 runs to the north of the land beyond Smarmel Road and also cuts across the north west corner of the site.

Tree Preservation Orders

4.17 There are a number of trees at the south western corner of the site in Finkley Down Farm Park which are subject to Tree Preservation Order TVBC.833 (as shown at Figure 10).

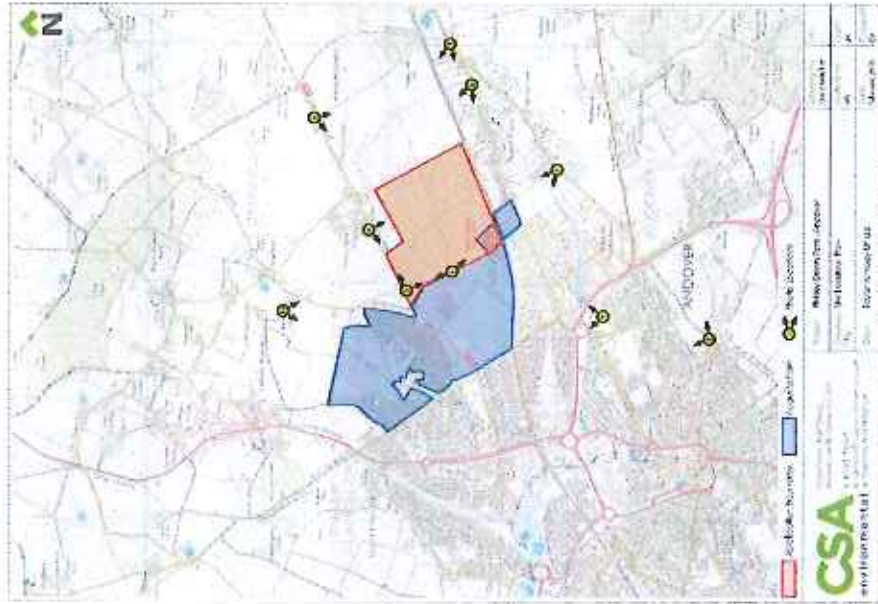


Figure 9: Photo viewpoint plan



Figure 10: Location of Tree Preservation Orders

Listed Buildings / Scheduled Ancient Monuments

4.18 There are a Listed Buildings and Scheduled Ancient Monuments to the north, east and west of the site. These include several listed buildings within the settlement of Smannell to the north, whilst to the east, a farmhouse and two Roman features (a Roman house and Devil's Ditch) are listed, which are also designated as Scheduled Ancient Monuments. To the west, East Arnon Manor and Farm and a number of associated buildings / structures are Grade II listed (Figure 11).

District Landscape Character Areas

4.19 At a district level, landscape character has been assessed through the Test Valley Community Landscape Project (TVCLP) which was published in 2004. The site is identified as being located within LC110 Open Chalklands and LCA10F Chalk Downland. The defining characteristics of which are set out in the Landscape Character Report.

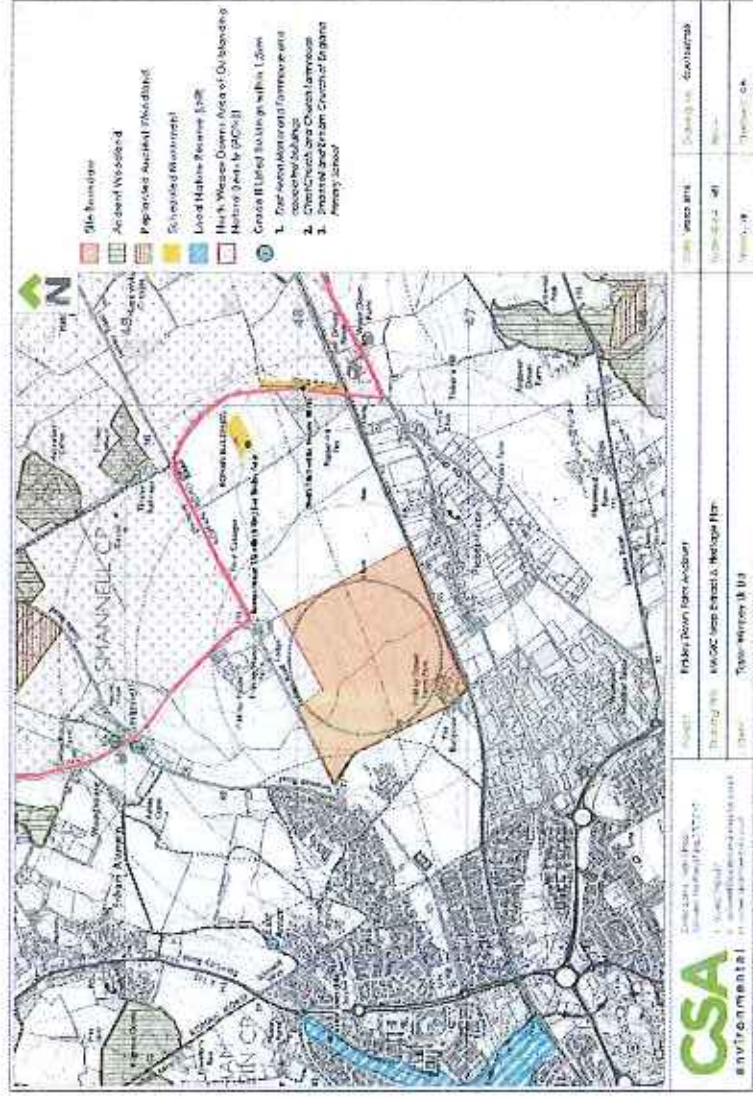


Figure 11: MKGIC Map Extract & Heritage Plan

4.20 Volume 2 of the TVCLP considers the landscape strategy and guidelines for each of the Character Areas. It describes the Andover Chalk Downland as a fragmented and open landscape with exposed views of the edge of Andover.

4.21 The TVCLP sets out the following objectives:

- Seek opportunities to mitigate impact of new development and integrate into the landscape by the planting of new hedgerow and woodland;
- Protect significant local vistas from visual intrusion;
- Reinforce the edge of Andover through careful design and appropriate landscape planning;
- Development to respond to local characteristics; and
- Seek opportunities to restore landscape features and create a strong landscape structure within the settlement edge of Andover.

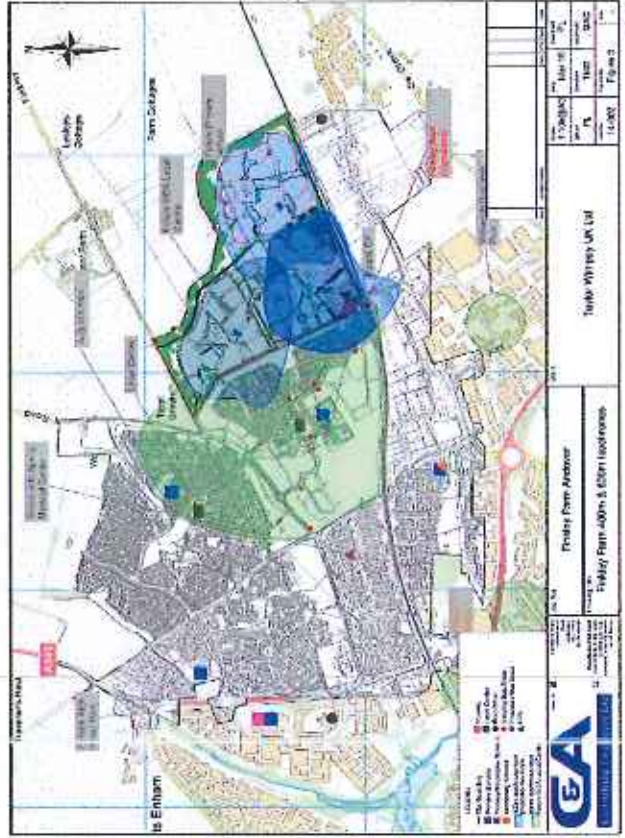
4.22 The current masterplan proposal for the site responds to the guidance set out in the TVCLP in the following ways:

- The proposal allows for the creation of significant areas of new native woodland, hedgerows and parkland in order to mitigate landscape impacts on the wider countryside;
- Development of the site will not impact on any significant local vistas;
- The masterplanning process indicates that a significant woodland buffer can be created alongside the northern and eastern site boundaries, which will provide a robust raw edge to the settlement;
- All significant vegetation can be retained and will be supplemented with significant areas of new landscape.

4.23 It is therefore considered that a landscape led design strategy, articulated in the current version of the masterplan, will ensure that development proposals will be in accordance with the objectives of the TVCLP.

Access to Services and Facilities

- 4.24 A Transport and Access Strategy has been prepared which concludes that Land at Finkley Down Farm is well located to access a wide range of services and facilities. This will support the key design principles of reducing the need to travel in the first instance and then to promote and encourage sustainable transport choices.
- 4.25 New development at Augusta Park includes a variety of new services and facilities, including primary schools, local centres (including supermarket shopping) and recreation / sporting facilities which will be accessed via the new spine road.
- 4.26 In this context the proposed layout will incorporate the provision of a network of direct and attractive links into the Augusta Park infrastructure to encourage walking and cycling. Figure 12 provides 400m and 800m walking isochrones which confirm that the majority of the site is within walking distance of the southern Augusta Park local centre and primary school. This, coupled with the proposed primary school on-site, will assist in encouraging sustainable walking and cycling trips to local facilities.



Ecology

- 4.33 The site comprises two large arable fields bounded by hedgerows and fencing as shown on the Updated Habitats Plan (Figure 14).
- 4.34 An ecological appraisal of habitats within the site was undertaken in October 2011. The 2011 study included a review of existing biological information for the site and its environs, as well as a site visit to record the broad habitat categories present, along with any other ecological features of note. The report recommended further survey work for badgers, bats, dormice and amphibians.
- 4.35 As part of the update to the understanding of the baseline conditions, CSA Environmental was instructed by Taylor Wimpey UK Ltd in 2018 to undertake an Update Ecological Appraisal. The purpose being to confirm whether the site conditions are consistent with the 2011 Ecological Appraisal.
- 4.36 By understanding the ecological conditions of the site, including opportunities for enhancement and the need for additional investigation and survey work, this will ensure that the masterplanning process accurately reflects and responds to the ecological circumstances, ensuring a positive and net gain in ecological conditions.
- 4.37 The habitats currently present within the site are generally common and widespread, with the greatest ecological interest associated with outgrown, native species hedgerows present at boundaries, which should be retained and protected wherever possible.
- 4.38 The 2018 Ecological Appraisal concludes that there are no overriding constraints to development at the site and provides recommendations for ecological enhancement measures that could be delivered as part of the proposed development.
- 4.39 The main findings and recommendations of the 2018 Ecological Appraisal are summarised below.

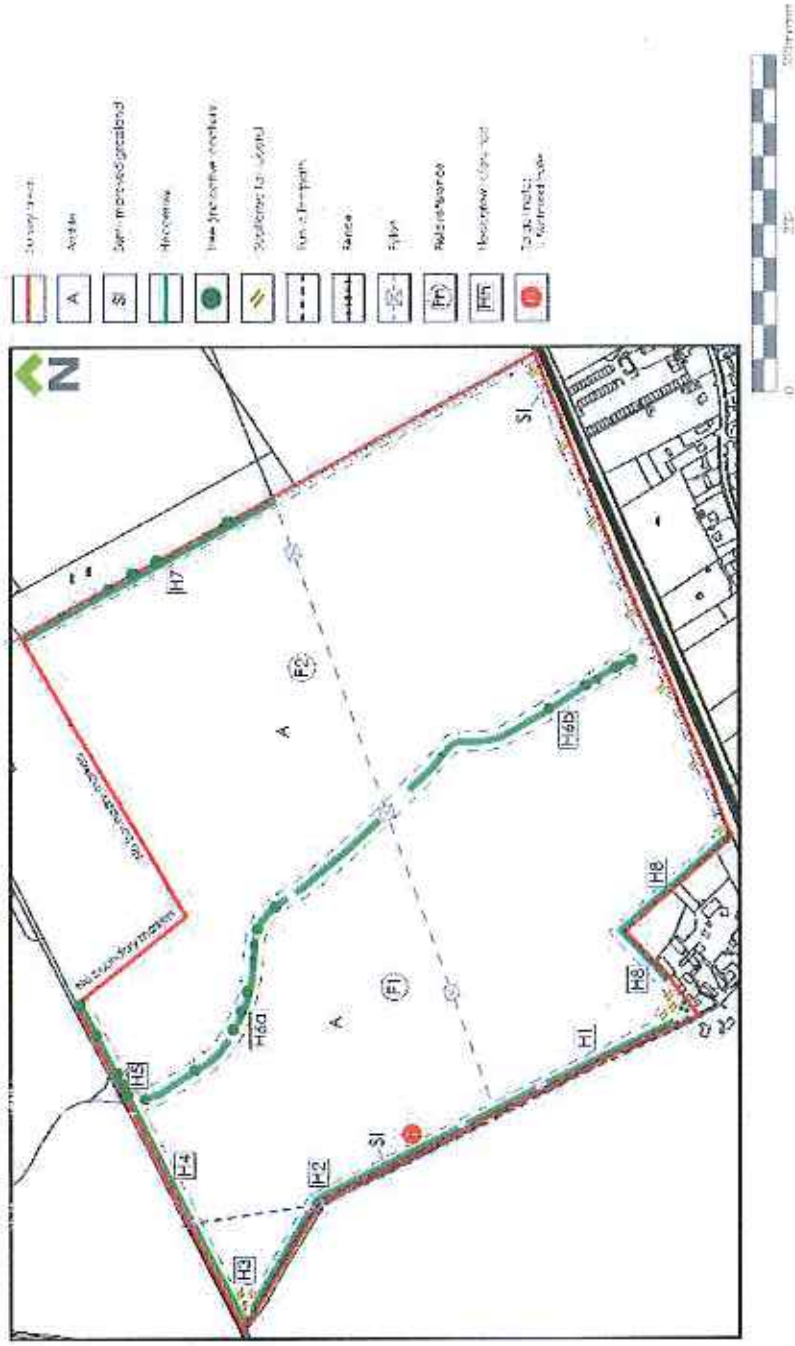


Figure 14: Updated Habitats Plan

Nature Conservation Designations

Statutory

4.40 There are no statutory designations covering any part of the site and it is confirmed that there are no international or national statutory designations within 10km and 3km of the site respectively.

4.41 One local statutory designation has been identified within 3km of the site: Anton Lakes LNR (c.1.3km west of the site). This LNR comprises a mosaic of habitats following the site's previous use for gravel extraction. Water-bodies, chalk grassland and an area of wet fen meadow are present at the LNR.

4.42 Owing to the distance and poor habitat connectivity between the Anton Lakes LNR and the site, and with consideration of its special interest features and their vulnerabilities, it is considered that development of the site is unlikely to cause significant effects to this local statutory designation.

Non-Statutory

4.43 There are 29 non-statutory designations identified within 2km of the site, with two of these being present within 1km: Churchill Way, London Road Verge, Andover Site of Importance of for Nature Conservation (SINC); (c.0.3km south-west of the site) and A3093 Churchhill Way Road Verge of Ecological Importance (RVEI) (c.0.8km south-west of the site).

Table 3: Statutory and Non-Statutory Designations within search radii

Site Name & Designation	Distance & Direction from Survey Area	Special Interests or Qualifying Features
Local Designations within 3km Anton Lakes LNR	c.1.3km west	Mosaic of habitats created following the site's previous use for gravel extraction. Habitats include water-bodies, chalk grassland and wet fen meadow. The site supports a range of flora and fauna including great crested newts, pondless stibetius, otter, water vole and water vole. <i>Arvicola amphibius</i>
Non-Statutory Designations within 10km Churchill Way, London Road Verge SINC	c.0.3km south-west	An area of grassland which has become poor quality through 'improper' management but retains elements of relic unimproved grassland to enable recovery.
A3093 Churchhill Way RVEI	c.0.8km south-west	Road verge supporting calcareous flora

Ancient Woodland

4.44 There is no designated Ancient Woodland covering any part of the site or immediately adjacent land. No trees on or adjacent to the site are listed on the Ancient Tree Inventory.

Ecological Appraisal Conclusions and Recommendations

4.45 The Appraisal has confirmed, or identified significant potential for, the following ecological constraints:

- Hedgerows
- Rare/notable arable flora
- Roosting, as well as foraging/dispersing bats
- Breeding birds
- Badgers
- Dormice

4.46 Notwithstanding, the 2018 Ecological Appraisal concludes that there are no overriding constraints to development of the Site which have been identified. However, in order to ensure adherence to national and local planning policies, the following opportunities for ecological enhancement have been identified.

- Aquatic habitat creation to provide new aquatic opportunities and increase biodiversity.
- Incorporation of native plants and those of wildlife importance in to the landscaping strategy to provide foraging opportunities for birds, invertebrates and bats.
- Improve connectivity of green infrastructure with new hedgerow planting and infill planting.

- Provision of new bat roosting and bird nesting opportunities through the erection of purpose-built bat/bird boxes on retained trees and new buildings within the proposed development.

4.47 Based on the ecological constraints identified, further surveys of these habitats and species, to confirm their status and distribution, and identify the nature of their use of the Site, are recommended to inform an evidence-based Ecological Impact Assessment of the proposed development. These are set out at Table 2.

Table 2: Recommendations for further ecological investigation / surveys

Ecological Feature	Further Work	Applicable timescales
Hedgerows	Hedgerow assessments of all hedgerows on site	June / July
Rare/notable arable flora	Botanical survey of arable field margins	Two visits in spring and summer (May to July)
Bats	Preliminary ground-based roost assessment of on-site trees	Any time
	Walked transects and periods of automated static monitoring	Consultation to be undertaken with the local authority to determine scope of surveys
Dormice	Nest tube presence/absence survey	Tubes to be set in March/April with at least five checks between May – November
Badgers	Comprehensive badger survey	February to April or September to October
Birds	Removal of habitat outside of bird nesting season	September to February
	Tree assessments for barn owls	Any time
	Breeding bird surveys	March to July

4.48 The scale of the site presents real opportunities to deliver ecological enhancements, based on up to date investigations and surveys as recommended within the 2018 Ecological Appraisal.

4.49 The conclusions and recommendations of current and additional specific surveys will be incorporated into the masterplanning process, such that the proposed development site has an overriding positive and lasting impact on the ecological circumstances of the site.

Archaeology

4.50 An assessment of the potential effects of the proposed development on buried archaeology has been undertaken in order to consider to ensure the site specific circumstances are understood and reflected in the masterplan. A summary of this Desk Based Assessment is provided below.

4.51 East Anton has been considered to be the site of a Roman small town known as *Leucomagus*, located at the junction of two Roman roads known as *Ironfield Way* and *Portway* approximately 750m to the west of the Site. Although archaeological investigations have identified dispersed late Iron Age and Roman activity, no evidence of Roman town has been forthcoming and the *Leucomagus* designation is considered to be almost certainly incorrect.

4.52 The landscape around Andover and East Anton appears to have been densely settled in the Roman period although the evidence for a well-organised and established society in the Iron Age and the absence of any significantly large Roman villas or garrisons, suggests either the landscape was already highly organised in formal land holdings or the area had not become particularly Romanised following the invasion. In other areas, various Roman finds of pottery, coins and building materials indicate the presence of possible farmsteads.

Previous Archaeological Investigations within the Site (Figure 15)

4.53 Site investigations have identified two scheduled monuments, located approximately 950m to the east (Figure 15 No.1 and No. 2). There is also a grade II listed buildings within the vicinity of the closest of which being the East Anton Manor and East Anton Farmhouse and associated outbuildings, located approximately 550m to the west (Figure 15, No.3).

4.54 Other listed buildings are identified as follows:

- Christ Church and Church Farmhouse, approximately 320m to the north (Figure 15, No. 4);
- Brinnell and Eatham Church of England Primary School, approximately 1km to the north (Figure 15, No.5);
- Woodhouse Bakery, approximately 1.1km to the north (Figure 15, No.6; and,
- The former Enham Alamein Museum and Estate Office, approximately 1.5km to the north-west (Figure 15, No.7).

4.55 A large area extending up to the western boundary of the Site was the subject of an archaeological desk based assessment in 1998 (ASE 1998). This was followed by a fieldwalking survey in 2001 which covered a very extensive area extending into the western part of the Site over part of a known cropmark (Figure 16).

Known archaeology sites within the development site (Figure 16)

4.56 Several archaeological assets are recorded within the site on the Hampshire AHR as follows:

- Bronze Age round barrow (Figure 16, No.9);
- Potential Bronze Age round barrow (Figure 16, No.10);
- Firdspot of seven gold Iron Age Coins (Figure 16, No.11)
- Cropmarks of an extensive settlement of potential Iron Age / Romano-British date (Figure 16, No.12)

4.57 It should be emphasized that the AHR database is consistently being updated and as such it should not be interpreted as a definitive list of all surviving archaeological remains.

Known archaeological sites close to the development site (Figure 17)

4.58 There are also numerous other archaeological assets recorded close to the site. The Archaeological Desk Based Appraisal provides a detailed list of such assets, which includes:

- A ring ditch with a central cremation pit and later prehistoric settlement (Figure 17, No 15)
- Cropmark of a ring ditch and possible settlement (Figure 17, No. 17);
- Finkley Manor Farm which is first documented in AD 1236 (Figure 17, No. 24)
- Finkley House landscape park which is post 1810 in date (Figure 17, No. 25)
- Site of World War II anti-aircraft battery (Figure 17, No. 26).



Figure 15: Site location and designated heritage assets



Figure 16: Recorded Heritage Assets within the Development Site



Figure 17: Other Recorded Heritage Assets

Archaeological Assessment and Conclusions.

4.59 The site is known to contain archaeological remains of varying significance. These consist of the following:

- the remains of up to three Bronze Age barrows. Several other barrows are located close to the Application Site indicating that the area was extensively used for Bronze Age burial;
- the cropmarks of a potential settlement of late Iron Age and Romano-British date. Archaeological fieldwalking in 2001 recovered a significant concentration of fine cracked flint and late Iron Age/Romano-British pottery from this cropmark. Seven Iron Age gold coins have also been recovered here. Other cropmarks within the Application Site could well be associated with this settlement;
- a Roman road known as The Porwey bounds the Application Site to the north and several Romano-British sites are known in close vicinity; and
- a sinuous field boundary which bisects the Application Site is of at least late 18th century date and the western boundary of the Application Site is bounded by a hedged trackway of probable early-mid 19th century origin. These features form part of the historic landscape and the former (along with other hedgerows) could be considered important under the Hedgerow Regulations of 1997 as it forms part of a pre-1845 field system.

4.60 The Archaeological Desk Based Assessment notes that as significant archaeological remains could be impacted upon by development, it is clear that additional archaeological fieldwork will be required. This could take the form of a geophysical survey followed by trial trenching.

4.61 If archaeological features are proven to exist and they cannot be preserved in-situ, they may have to be the subject of mitigation in the form of archaeological excavation.

4.62 Therefore, as part of the masterplanning and design process it will require consultation with the Heritage Team of Hampshire County Council, the archaeological advisors to Test Valley Borough Council, in order to agree an appropriate archaeological strategy.

4.63 The detailed archaeological evaluation will ensure that it is possible to ascertain which, if any, areas of the site contain significant archaeology.

4.64 Should any such archaeology be worthy of preservation in situ the size of the site will allow the masterplan, when designed and finalised, a substantial degree of flexibility to accommodate public open spaces over areas where significant archaeology has been identified. Otherwise all archaeological remains will be appropriately excavated, recorded and the results published to ensure preservation by record.



Figure 48: view towards earthwork complex looking north-east



Figure 49: view of former trackway represented by a double hedge looking north.

Preliminary Flood Risk Review Incorporating Sustainable Urban Drainage

4.65	<p>In support of the promotion of the site a Preliminary Level 1 Flood Risk Assessment (FRA) incorporating Sustainable Urban Drainage (SuDS) has been prepared.</p>	<ul style="list-style-type: none"> The minimal threat of flooding from overland flow during extreme flood events will flow unrestricted away from residential development via the road corridors and dry swale networks to the proposed retention/infiltration basins/ponds at the low-lying catchment boundaries; and 	4.77	<p>In order to mitigate against the risk from localized overland flooding to the proposed development and to reduce the risk of off-site flooding from the development, the proposed sustainable drainage management train provides flood storage and source control in the form of porous paving, pre-cellular storage, dry swales and retention/infiltration basins/ponds.</p>
4.66	<p>This assessment has been produced in accordance with the NPPF, together with The Flood & Water Management Act 2010. In addition, attention has been paid to the National Planning Practice Guidance (NPPG) and policies within the extent Test Valley Local Plan. It also utilises the approved FRA for Augusta Park.</p>	<ul style="list-style-type: none"> The on-site surface water sewer network can be designed to cater for the 1 in 50-year storm event providing off-line storage in the form of SuDS to attenuate/initialise run-off generated during flood events up to and including the 1 in 100 years plus 42% climate change. 	4.78	<p>Sustainable drainage techniques will be maximized across the development, providing an interlinked 'green' SuDS management train including soakaways, porous paving and/or cellular storage at source, dry swales through the built form, before discharging into retention/infiltration ponds/basins, prior to discharging into the ground via infiltration techniques.</p>
4.67	<p>The NPPF adopts a risk-based approach to determine the suitability of developments which are located within the floodplain (Flood Zones 2 & 3). The key component of this approach is the application of the Sequential Test which aims to divert development to areas of a lower probability of flooding.</p>	<p>SuDS Strategy</p> <p>As a consequence of the proposed development the current drainage regime will be affected by increasing impermeable surfaces and therefore increasing the rate, volume and potential concentration of surface water run-off.</p>	4.79	<p>The introduction of the swales and infiltration basins/ponds will also provide water quality treatment and valuable ecological corridors. Dry swales will convey both minor and major storm events, providing some storage and infiltration, and will interconnect with the attenuation/infiltration ponds/basins that will provide the majority of major storm event storage.</p>
4.68	<p>The proposed development site is located outside the fluvial floodplain in Flood Zone 1 (low probability), thereby having an annual probability of flooding of less than 0.1% (or less than 1 in 1,000) from fluvial sources.</p>	<p>It is therefore necessary to provide mitigation measures to offset the potential impact. It is proposed that surface water discharges to the sub-sewers (chalk) will be limited to the calculated greenfield run-off rates and treated via a SuDS management train.</p>	4.80	<p>The Preliminary Flood Risk Assessment demonstrates that the proposed development can safeguard against the risks of flooding for its lifetime. The assessment concludes that flood risk to the development is minimal based on the whole site being located within Flood Zone 1.</p>
4.69	<p>The proposed development is for residential development and therefore, is consistent with the appropriate uses for Flood Zone 1.</p>	<p>A preliminary SuDS scheme is shown at Figure 20, with specific details set out in the TUD report.</p>	4.81	<p>Furthermore, the development proposals maximize the use of sustainable urban drainage in line with best practice.</p>
4.70	<p>Accordingly the proposed development satisfies the Sequential Test.</p>	<p>A small part of the site, in the north-western corner, falls within the groundwater Source Protection Zone 2 (see Figure 21). The Environment Agency's Position Statements on Groundwater Protection, sets out the required approach for dealing with developments located within groundwater source protection zones and particularly where as in this case, surface water run-off will be discharged to ground.</p>	4.82	<p>The comprehensive SuDS system will reduce suspended solids, heavy metals and hydrocarbons from the runoff and to provide the necessary water quality treatment prior to discharge into the ground, which will ensure compliance with the Environment Agency's Position Statements.</p>
4.71	<p>The Preliminary FRA demonstrates that the site generally poses a low risk to future users of the site. This is based on the following:</p>	<p>The comprehensive SuDS system will reduce suspended solids, heavy metals and hydrocarbons from the runoff and to provide the necessary water quality treatment prior to discharge into the ground, which will ensure compliance with the Environment Agency's Position Statements.</p>	4.83	<p>Furthermore, the development proposals maximize the use of sustainable urban drainage in line with best practice.</p>
4.72	<p>The proposed development for residential development and therefore, is consistent with the appropriate uses for Flood Zone 1.</p>	<p>The comprehensive SuDS system will reduce suspended solids, heavy metals and hydrocarbons from the runoff and to provide the necessary water quality treatment prior to discharge into the ground, which will ensure compliance with the Environment Agency's Position Statements.</p>	4.84	<p>Furthermore, the development proposals maximize the use of sustainable urban drainage in line with best practice.</p>
4.73	<p>The proposed development for residential development and therefore, is consistent with the appropriate uses for Flood Zone 1.</p>	<p>The comprehensive SuDS system will reduce suspended solids, heavy metals and hydrocarbons from the runoff and to provide the necessary water quality treatment prior to discharge into the ground, which will ensure compliance with the Environment Agency's Position Statements.</p>	4.85	<p>Furthermore, the development proposals maximize the use of sustainable urban drainage in line with best practice.</p>
4.74	<p>The proposed development for residential development and therefore, is consistent with the appropriate uses for Flood Zone 1.</p>	<p>The comprehensive SuDS system will reduce suspended solids, heavy metals and hydrocarbons from the runoff and to provide the necessary water quality treatment prior to discharge into the ground, which will ensure compliance with the Environment Agency's Position Statements.</p>	4.86	<p>Furthermore, the development proposals maximize the use of sustainable urban drainage in line with best practice.</p>
4.75	<p>The proposed development for residential development and therefore, is consistent with the appropriate uses for Flood Zone 1.</p>	<p>The comprehensive SuDS system will reduce suspended solids, heavy metals and hydrocarbons from the runoff and to provide the necessary water quality treatment prior to discharge into the ground, which will ensure compliance with the Environment Agency's Position Statements.</p>	4.87	<p>Furthermore, the development proposals maximize the use of sustainable urban drainage in line with best practice.</p>
4.76	<p>The proposed development for residential development and therefore, is consistent with the appropriate uses for Flood Zone 1.</p>	<p>The comprehensive SuDS system will reduce suspended solids, heavy metals and hydrocarbons from the runoff and to provide the necessary water quality treatment prior to discharge into the ground, which will ensure compliance with the Environment Agency's Position Statements.</p>	4.88	<p>Furthermore, the development proposals maximize the use of sustainable urban drainage in line with best practice.</p>



Figure 20: Preliminary Surface Water Drainage Strategy

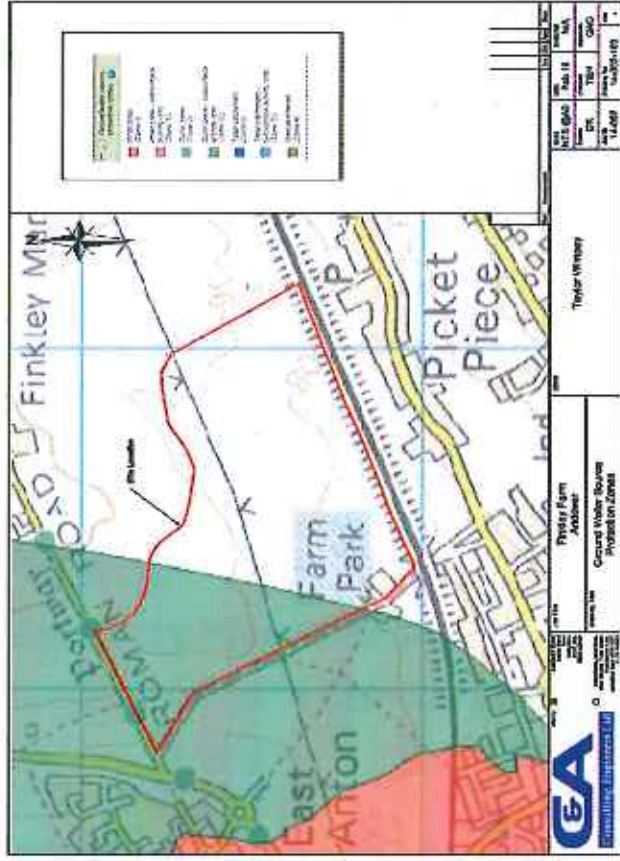


Figure 21: Ground Water Source Protection Zones

Foul Water Drainage

4.52 A Preliminary Foul Water Drainage Review has been produced to assist in the preparation site masterplan and the associated strategy has been designed following initial discussions with the Environment Agency and Southern Water plc.

4.53 The final foul water drainage strategy will be designed in accordance with, and will be constructed to, the requirements of Sewers for Adoption 7th Edition Standards, or any updates to such standards applicable at the time. Figure 22 shows the proposed strategic foul water drainage plan.

Existing Site Conditions

4.54 As farm land the site does not benefit from any existing sewerage infrastructure, however a significant infrastructure network has been constructed on the Augusta Park development, including a pump station near the Finkley Arch railway bridge and gravity sewer networks within the development site.

4.55 Upon completion the Augusta Park development will comprise 3,055 dwellings. Prior to the construction of Augusta Park Taylor Wimpey funded the upgrade of the existing public sewerage network and confirmed that the Fullerton Waste Water Treatment Works was capable of servicing 3,250 dwellings.

4.56 The topography of the site allows for a traditional gravity sewerage network to be employed on the site. The site is not at risk of fluvial flooding or ground water flooding.

4.57 The housing density proposed at this site will vary between 30 and 40 units per hectare and this has been used for all calculations with a foul flow of 4,000 litres/dwelling/day as per Sewers for Adoption.

4.58 The proposed development may require an off-site Sewer Requisition under the provisions of Section 95 of the Water Industry Act 1991 (as amended); further investigation will be required as the promotion of the site advances through the Local Plan Review process. However, it is noted that there is capacity within the existing network for 215 dwellings and the Augusta Park development has been designed to accommodate all of the proposed extension.



Figure 22: Preliminary Foul Water Drainage Strategy

4.59 Existing Southern Water plc infrastructure in the area of Andover has been upgraded as part of Southern Water's wider infrastructure improvement plan. The upgrade should provide suitable capacity at Fullerton Waste Water Treatment Plant as well as the serving network to take further flows from the proposed development.

4.90 The foul drainage network will be offered to Southern Water plc for Adoption under the provisions of Section 104 of the Water Industry Act 1991 (as amended).

4.91 Taking the above into account it is considered that the site can be adequately drained utilizing existing or currently proposed infrastructure.

Foul Drainage Design Philosophy

4.92 The drainage will be split into development phases zones, or networks, these can be separated into strategic and non-strategic foul sewers.

4.93 The strategic foul sewers will serve as a main spine through which all foul flows will travel in order to reach the Augusta Park infrastructure which will be adopted by Southern Water plc prior to any development at Finkley Down Farm. These strategic sewers will have spurs provided for connection to the individual (non-strategic) land parcels.

4.94 The number of dwellings each foul sewer has been designed to cater for reflects the proposed current masterplan and proposed densities of each development parcel, taking into account topography, use and the masterplan layout.

4.95 The maintenance of the foul water drainage infrastructure adopted by Southern Water under the provisions of Section 104 of the Water Industry Act 1991 will become the responsibility of Southern Water plc.

Noise

- 4.96 A Noise Exposure Assessment has been prepared which presents the results of environmental noise surveys undertaken in order to measure the prevailing background noise levels and to determine the sites suitability for development.
- 4.97 An environmental noise survey was undertaken at three locations at the northern, southern and western boundaries of the site (Figure 23), in order to obtain representative noise levels due to the observed noise sources around the site, and based on accessibility and consultation with the principal health officer of Tost Valley Borough Council.
- 4.98 Noise surveys were carried out between the 7th and 8th February 2016 during the daytime (07:00 to 23:00), and night-time (23:00-07:00). The prevalent noise source during the survey period was noted to be rail traffic with distant road noise also audible.
- 4.99 The results of the noise survey indicate that the southern and northern site boundary would exceed recommended noise levels as set out in relevant standards.



Figure 23: Noise Monitoring Locations

4.100

As such mitigation measures have been recommended within the Noise Exposure Report to ensure that a good level of amenity for residents could be achieved, such mitigation is likely to include:

4.101

Landscape buffer: due to the proximity of the rail line to the southern boundary (approximately 5m at the nearest point) a landscape buffer is recommended to be introduced for the southern boundary of the site. In doing so, this will ensure that the increased distance from the rail line and the nearest dwelling would adequately attenuate noise. The Noise Exposure Report recommends a minimum distance of 20m for this buffer.

4.102

Site Layout: Dwellings that are constructed nearer to noise sources would provide acoustic screening for dwellings to the interior of the development. By ensuring that bedroom windows do not face directly on to the rail line (for example ensuring south facing gable end walls of the southern-most properties, or orientating bedroom windows north), noise levels would be significantly reduced.

4.103

Design of buildings: With regards to dwellings that would face the rail line, it is recommended that habitable rooms face away from the noise source. Where this is not practically possible, the glazing and ventilation strategy of that facade should provide adequate levels of noise attenuation.

4.104

Subject to such mitigation the Noise Exposure Report concludes that a good level of amenity could be obtained for all future residents and as such, the entirety of the proposed development site would be suitable for residential development in terms of the exposure to noise, ensuring that a good level of residential amenity is achieved through the masterplanning process.



Figure 24: Daytime Noise Contour Plan



Figure 25: Night-time Noise Contour Plan

Air Quality Assessment.

Utilities

- 4.105 An Air Quality Assessment has been prepared to assess the likely air quality conditions at the proposed development site.
- 4.106 Following a review of monitoring and statutory air quality reports, the Air Quality Assessment identifies concentrations of NO₂, PM₁₀ and PM_{2.5} at the Site are significantly below the respective Air Quality Strategy Objectives in recent years.
- 4.107 Based on these concentrations, the future concentrations for the future residential users of the Development is not a constraint to the Site for residential and educational uses.
- 4.108 Based on the size of the Development it is anticipated that it would generate vehicles above the Environmental Protection UK Institute of Air Quality Management guidance of when an air quality assessment is required.
- 4.109 Notwithstanding, the development site is not located in an area of concern to air quality. The Development would be designed to ensure that sustainable modes of transport, such as walking and cycling, are encouraged. Given the current air quality conditions at the Site, the increase in daily vehicles resulting from the Development is not considered significant.
- 4.110 As such the likely effect of the operational Development on local air quality would not be significant and the potential impact from the operation of the Development on local air quality is not considered to be a constraint to the proposals.
- 4.111 All other utilities can be provided by suitable upgrades to the East Anston MDA infrastructure which is currently under construction. Importantly all of these utilities are being provided by one utility company (GTC) for ease of up grading, with the exception of the water supply, which is being undertaken by Southern Water plc who as the incumbent Water Authority will need to supply the Development.
- 4.112 This would be undertaken by extending the existing network within the East Anston WDA and if necessary offsite reinforcement. Discussions are ongoing with Southern Water on this matter.

APPENDIX TWO – NEW FOREST DISTRICT COUNCIL COMMENTS

RESPONSE TO TEST VALLEY BOROUGH COUNCIL ISSUES AND OPTIONS CONSULTATION FOR THE NEXT LOCAL PLAN

1. PURPOSE OF REPORT

- 1.1 To agree the Council's response to the Test Valley Borough Council's 'Issues and Options' consultation relating to the preparation of its Local Plan review. The closing date for comments is 14th September 2018.

2. BACKGROUND

- 2.1 Test Valley Borough immediately adjoins the New Forest District and includes a small area of the New Forest National Park. Test Valley Borough Council (TVBC) adopted its current Local Plan covering the period 2011 – 2029 in January 2016. The Borough Council is at an early stage in undertaking a review of its Local Plan and is consulting on an "Issues and Options" document between 6 July and 14 September 2018. The document does not contain any initial policies or proposals, but seeks views on key issues which will help shape the preparation of its new local plan which will cover the period up to 2036.

3. KEY ISSUE

- 3.1 The key issue for New Forest District Council regarding the Test Valley Local Plan review relates to addressing objectively assessed (housing) need (OAN).
- 3.2 This Council's Local Plan Review has been prepared under the previous National Planning Policy Framework (2012). The Council's view is that its proposals to plan for 10,500 dwellings (525 dwellings per annum) meet the housing need during the plan period, using a methodology for calculating OAN in accordance the NPPF 2012 and its accompanying guidance. To reach this figure 1500 new homes are proposed within the Green Belt within the plan area.
- 3.3 On 27 November 2017, New Forest District Council wrote to Test Valley Borough Council and while not at that stage seeking assistance from neighbouring authorities in addressing 'unmet' housing need arising in the Council's Plan Area, asked the following:

".. in the event that this methodology is confirmed and considered an appropriate basis for establishing OAN for New Forest District, we need you to consider what assistance your authority may be able to offer to help meet the housing need we are unable to address in our plan area. This could be for a very significant number of dwellings (est. 5,000-6,000)..". (Full letter in Appendix 1)

The letter also asked whether there is any non-Green Belt land within Test Valley administrative area which would be available and suitable to address unmet housing needs of New Forest district as an alternative to the release of Green Belt land. The response letter indicated an inability to assist.

- 3.4 For Local Plans submitted to the Secretary of State after 24th January 2019, the new standard method of calculating the minimum annual local housing need figure has now been introduced by the revised NPPF published in July 2018. Using the standardised revised methodology (at September 2017) the Government estimated that the 'indicative assessment of housing need based on the new formula' (2016 – 2026) for New Forest District would be 965 dwellings per annum (while acknowledging that 86% of the district is land area covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Special Scientific Interest). The consequence of the introduction of the new standardised methodology in July 2018, is that the assessed housing need figure for New Forest District (including the National Park) increases by a further 400 dwellings per annum.
- 3.3 Given the extensive work this Council has undertaken to establish capacity for new residential development within the Plan Area outside the National Park, this Council has strong evidence to support its view that there is no realistic prospect that this Council would be able to further increase housing provision within its Plan Area above that proposed in its Local Plan Review Submission document. It is anticipated that there is likely to be a 'shortfall' of housing provision within New Forest District (District Council and National Park Authority Planning Authority Areas) of some 8000 dwellings between 2016 and 2036 (400 dwellings per annum).
- 3.4 The National Planning Policy Framework, paragraph 60 states that "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." Accordingly, as a neighbouring authority this Council is in a position to give early notice to Test Valley Borough Council, that in preparing its local plan review, Test Valley Borough Council should explore capacity within their plan area to address unmet housing needs arising beyond their administrative boundary (in New Forest District) in addition to addressing housing needs arising from within their plan area.

4. ENVIRONMENTAL IMPLICATIONS

- 4.1 Accommodating new development has an impact on the environment. It is important that those impacts are minimised or mitigated by locating development in the most sustainable locations.

5. FINANCIAL, EQUALITY & DIVERSITY and CRIME & DISORDER IMPLICATIONS

- 5.1 None

6. RECOMMENDATION

- 6.1 It is recommended that Test Valley Borough Council be informed that New Forest District Council:
- i. Welcome the early opportunity to comment on the matters to be considered by Test Valley Borough Council in its review of the Local Plan for the Borough; and
 - ii. Advise Test Valley Borough Council that under the new methodology for housing need assessments introduced by Government in July 2018, this District will not be able to accommodate the full extent of local housing need within its boundary and considers that as part of the preparation of the Test Valley Local Plan

review, Test Valley Borough Council should consider opportunities to deliver increased levels of housing to address unmet housing need arising from neighbouring areas.

8. PORTFOLIO HOLDER DECISION

I agree to the recommendations of this report that in relation to the Test Valley 'issues and options' consultation.

Signed: _____

Date: 20 August 2018

For further information contact:

Name: Louise Evans
Title: Policy and Strategy Service Manager
E-mail: _____
Tel: _____

Background Papers:

Published documents¹

Date on which notice given of this Decision – Monday, 20 August 2018

Last date for call-in – Tuesday, 28 August 2018

¹ <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/local-development-framework/issues-and-options-consultation-for-the-next-local-plan>

Appendix 1: Letter from Chief Executive New Forest District to Test Valley Borough Council (and other Authorities)

Chief Executive

Bob Jackson

My Ref: BJ/LE/DL

Your Ref:

Date: 27 November 2017

The Chief Executives of:
Southampton City Council
Test Valley Borough Council
Eastleigh Borough Council
Winchester City Council
Fareham Borough Council
Christchurch and East Dorset Councils
Bournemouth Borough Council
Borough of Poole
Wiltshire Council

Dear Colleague

NEW FOREST DISTRICT (OUTSIDE THE NATIONAL PARK) LOCAL PLAN REVIEW 2016 -2036

New Forest District Council is reaching an advanced stage in the preparation of its Local Plan Review, which will cover the period from 2016 to 2036. The geographical area of plan coverage is New Forest District Council's area excluding the area within the National Park.

In reviewing the Local Plan, the most significant issue this Council has had to address is achieving a step change in housing growth compared with previous regional planning policies for development restraint in this area. The Council's position is that it wishes to plan positively to address the need for new housing development within its planning area as far as it is able to do so. With the evidence base nearing completion we are now in a position where it has become clear the extent to which the housing needs of the plan area can be met.

From an early stage in our plan preparation we have been aware of the potential difficulties of addressing the full extent of 'objectively assessed (housing) needs' within a plan area that is subject to very significant environmental and planning constraints, including Green Belt. This issue, along with other cross-boundary issues, has been discussed at various officer liaison meetings with other local authorities, including your authority, within our shared housing market areas from an early stage of plan preparation. Most recently, I am grateful for your authority's participation in a series of meetings with my officers and officers from the National Park Authority to informally discuss the work undertaken within New Forest District and National Park to establish the levels of new housing development that could be delivered within the District to 2036. At these meetings, in respect of New Forest District outside of the National Park, we informed your officers that this Council expected to be able to make provision for around 10,000 new dwellings between 2016 and 2036. To provide for this level of housing development, the District Council will include proposals to release land from the Green Belt for housing development in its plan. However, even with the release of Green Belt land for development, the provision figure represented a shortfall against the assessment of 'objectively assessed need' in the New Forest Strategic Housing Market Assessment published in 2014. (This shortfall would be in the order of some 2750 dwellings in relation to New Forest District outside the National Park). We therefore had expected to have to make a formal request to your Council for assistance in meeting a potential shortfall of housing supply within our Plan Area.

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However, over the past few weeks we have been able to review our position. The Council (again with the New Forest National Park Authority) has commissioned an updated assessment of Objectively Assessed Housing Need (OAN) for the area (October 2017). On the basis of the analysis carried out, it is concluded that the OAN is for 521 dwellings per annum (over the period 2016 to 2036) in the New Forest District outside the National Park; a total of 10420 dwellings over the twenty year plan period. (This study can be viewed on the Council's web site at: <http://www.newforest.gov.uk/CHttpHandler.ashx?id=35575&p=0>). With the further and more detailed assessment of potential site allocations we are currently undertaking, and on the assumption that the 2017 assessment of OAN for the District and National Park is accepted as an appropriate methodology for assessing OAN for this area (and an appropriate basis for establishing the housing requirement of the Local Plan Review), there is now the prospect that this Authority will be in the position of submitting a Local Plan which is on target to address the identified level of housing need within its plan area. This being the case there would not be a need, under the Duty to Co-operate, for this Authority to seek assistance from your Authority in meeting unmet housing requirements arising from our Plan Area.

There are however, two caveats to the above position. As you will be aware, in September 2017 the Government consultation paper "Planning for the right homes in the right places" proposed a new standardised methodology for assessing OAN for housing. While the consultation paper recognised that available data does not allow local housing needs to be calculated using the standard method where local planning authorities do not align, such as in areas with National Parks, it nonetheless published a calculation for New Forest District estimating that under the proposed new formula there would be a requirement for 965 dwellings per annum in New Forest District between 2016 and 2026, a very significant increase. We consider there are significant issues relating to the proposed methodology. However, in the event that this methodology is confirmed and considered an appropriate basis for establishing OAN for New Forest District, we need you to consider what assistance your authority may be able to offer to help meet the housing need we are unable to address in our plan area. This could be for a very significant number of dwellings (est. 5,000-6,000). As we have already stated above, in seeking to plan for a target of 521 dwellings per annum, this Authority will have already maximised the extent to which housing provision can be made in this district without causing significant adverse environmental impacts.

Further, as stated earlier in this letter, the Council is proposing a number of sites within the Green Belt for housing development, which will in total accommodate around 1400 dwellings. It needs to be recognised that the Government have reiterated its intention to maintain existing strong protections for the Green Belt, and has clarified that Green Belt boundaries should be amended only in exceptional circumstances when local authorities can demonstrate that they have fully examined all other reasonable options for meeting their identified housing requirements. The White Paper published in February 2017, 'Fixing our broken housing market' stated in para.1.39 that: "...authorities should amend Green Belt boundaries only when they can demonstrate that they have examined fully all other reasonable options for meeting their identified development requirements, including:exploring whether other authorities can help to meet some of the identified development requirement." We therefore need to ask your Authority to consider whether there is any non-Green Belt land within your administrative area which would be available and suitable to address unmet housing needs of New Forest district as an alternative to the release of Green Belt land.

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This letter has focused on the issue of Local Plan housing provision. However, I am aware that our officers have also been collaborating on a number of other cross-boundary issues, dealing with matters such as mitigation of the impacts of development on European nature conservation sites, especially the New Forest Natura 2000 site and River Avon water quality issues, and infrastructure. I hope that our authorities will be able to prepare a Statement of Common Ground regarding these matters.

I would welcome your Authority's comments on this letter and, in particular:

- a.) Your views on this Council promoting a strategy based on the Objectively Assessed Housing Need Study 2017 by JG Consulting, which includes an assessment that the objectively assessed housing need figure for this plan area should be 521 dwellings per annum over the period 2016 to 2036.
- b.) Your views on the potential assistance your Authority may be able to provide in terms of helping to address 'unmet housing needs' from this area, either to avoid the release of Green Belt land for development, or to address a housing requirement set higher than 521 dwellings per annum, for example by application of the proposed national standardised methodology.

I would appreciate a response to this letter by 20th December. If it would help, please do not hesitate in contacting myself or my Local Plan Team if you would like to discuss this letter further before responding.

Yours sincerely

/

Bob Jackson
Chief Executive

RESPONSE TO TEST VALLEY BOROUGH COUNCIL ISSUES AND OPTIONS CONSULTATION FOR THE NEXT LOCAL PLAN

1. PURPOSE OF REPORT

- 1.1 To agree the Council's response to the Test Valley Borough Council's 'Issues and Options' consultation relating to the preparation of its Local Plan review. The closing date for comments is 14th September 2018.

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review, Test Valley Borough Council should consider opportunities to deliver increased levels of housing to address unmet housing need arising from neighbouring areas.

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Signed:

Date: 20 August 2018

For further information contact:

Name: Louise Evans
Title: Policy and Strategy Service Manager
E-mail: '
Tel: (

Background Papers:

Published documents¹

Date on which notice given of this Decision – Monday, 20 August 2018

Last date for call-in – Tuesday, 28 August 2018

¹ <https://www.testvalley.gov.uk/planning-and-building/planningpolicy/local-development-framework/issues-and-options-consultation-for-the-next-local-plan>

Appendix 1: Letter from Chief Executive New Forest District to Test Valley Borough Council (and other Authorities)

The Chief Executives of:
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Test Valley Borough Council
Eastleigh Borough Council
Winchester City Council
Fareham Borough Council
Christchurch and East Dorset Councils
Bournemouth Borough Council
Borough of Poole
Wiltshire Council

Chief Executive

Bob Jackson

My Ref: BJ/LE/DL

Your Ref:

Date: 27 November 2017

Dear Colleague

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Yours sincerely

Bob Jackson
Chief Executive