

Planning Policy

From: Graham Lamb <G.Lamb@pegasusgroup.co.uk>
Sent: 14 September 2018 16:43
To: Planning Policy; Goodridge, Tim
Cc: Sebastian Tibenham
Subject: RE: Issues and Options Consultation for the next Local Plan - Representation by Peel Land and Property - Land at Bere Hill Farm Andover
Attachments: R001v4 - Issues Options Reps w App.pdf

Dear Sir/Madam,

Further to my email below please find attached representations submitted on behalf of Peel in respect of their land at Bere Hill Farm, Andover.

I look forward to your confirmation of receipt.

Kind regards,

Graham Lamb
 Associate Planner

Pegasus Group

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

1000
 T 01273 800000
 M 07770 000000

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester | Peterborough



Pegasus Group is the trading name of Pegasus Planning Group Ltd (07277000) registered in England and Wales.
 This email and any associated files, is intended for the exclusive use of the addressee only.



If you are not the intended recipient you should not use the contents nor disclose them to any other person.

If you have received this message in error please notify us immediately. We have updated our Privacy Statement in line with the GDPR; please [click here](#) to view it.

Please consider the environment before printing this email message.

The **PLANNING AWARDS 2018**
 Celebrating excellence in planning and placemaking

FINALIST

From: Graham Lamb
Sent: 14 September 2018 16:29
To: G.Lamb@pegasusgroup.co.uk
Cc: S

10137



TEST VALLEY LOCAL PLAN: ISSUES AND OPTIONS CONSULTATION

REPRESENTATION BY PEEL LAND AND PROPERTY

Date: 14th September 2018

Pegasus Reference: ST/GL/P18-1774/R001v4

Pegasus Group

T

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | East Midlands | Leeds | Liverpool | London | Manchester

PLANNING | DESIGN | ENVIRONMENT | ECONOMICS

© Copyright Pegasus Planning Group Limited. The contents of this document must not be copied or reproduced in whole or in part without the written consent of Pegasus Planning Group Limited.

CONTENTS

1. INTRODUCTION	2
2. SITE & SETTLEMENT CONTEXT	5
3. ANDOVER SETTLEMENT ANALYSIS.....	8
4. ECONOMIC GROWTH IN TEST VALLEY.....	15
5. VISION AND OBJECTIVES (CHAPTER 4).....	18
6. LIVING IN TEST VALLEY/ HOUSING POLICIES (CHAPTER 5)	19
7. WORKING IN TEST VALLEY/ EMPLOYMENT POLICIES (CHAPTER 6)	32
8. ENJOYING TEST VALLEY/ ENVIRONMENTAL POLICIES (CHAPTER 7).....	33
9. INFRASTRUCTURE IN TEST VALLEY (CHAPTER 8)	35
10. CONCLUSIONS	36
APPENDIX 1 – SITE LOCATION PLAN.....	37
APPENDIX 2 – LATEST INDICATIVE MASTERPLAN	38

1. INTRODUCTION

- 1.1 Pegasus Group are instructed by Peel Land and Property Ltd ('Peel') to make representations to the 'Issues and Options Consultation for the next Local Plan', which ran from 6th July to 14th September 2018.
- 1.2 We wish to state at the outset our support for this early Local Plan review, and the rationale given at paragraph 1.6 which confirms that this has been done to respond evolving local strategies and aspirations such as those set out in the Corporate Plan; and changes in national policy, not least the revised NPPF and the requirement to review plans every 5 years.
- 1.3 Very recent changes to National Planning Policy Guidance were also issued on 13th September 2018, including new/revised sections on the use of the standard methodology for assessing 'minimum' housing needs and Plan-Making. We have briefly reviewed this guidance and incorporated some comments in these representations where relevant. However, given the revisions were only issued yesterday, we would like to reserve Peel's right to make further comments in relation to the Local Plan and the relevance of the Revised NPPF/NPPG once we have had more time to absorb the latest guidance and considered its content, relevance and consequences for the Test Valley area.
- 1.4 We also welcome the invitation to provide comments on such a wide range of issues at an early stage in the process.
- 1.5 This suggests a proactive approach on behalf of the Council and should ensure a positively prepared plan that will meet emerging development needs in full, in line with the Revised NPPF.

Peels Land Interests & Proposed Development

- 1.6 Peel have legal control of 52.6 Ha (130 acres) of agricultural land at Bere Hill, to the south east of Andover, and are seeking to promote it for residential development through the emerging Local Plan process for approximately 700 units. This is subject to potential change further to other technical work.
- 1.7 The full extent of the site is illustrated below and on the Site Location Plan attached at **Appendix 1** and below at Figure 1.1. We also have provided the latest indicative masterplan at Appendix 2 and Figure 2.1 below, albeit this might be subject to change following a further technical review.

Figure 1.1 – Peel Ownership



- 1.8 Details of this site have previously been submitted to the 'call for sites' processes for the:
- **2014 SHLAA (Site ref: 198)** - for up to 1,000 units across a larger 111 Ha (274 acres) site; although it was not allocated within the adopted Local Plan (2016).
 - **2017 SHELAA (Site ref: 247)** - for up to 700 units, across the current 52.4 Ha (129 acres) site (of which 18.9 Ha (47 acres) was considered deliverable). This concluded that change in policy would be required to allow the site to come forward.
- 1.9 Accordingly, the site is being promoted on a similar basis to the 2017 SHELAA, but with more detail provided to respond to the emerging local plan review. As stated, previously the illustrative masterplan is subject to technical review and may change.

Representation Structure

- 1.10 The remainder of this report is structured as followed, with reference to the questions considered most relevant to Peel at this stage:
- In **Section 2** we describe the site, its surroundings and the latest proposed development in more detail;
 - In **Section 3** we provide a settlement profile of Andover and its position within the settlement hierarchy of Test Valley;
 - In **Section 4** we look at economic growth within Test Valley in recent years, and how this compares with the assumptions that underpinned the adopted plan and its evidence base;

- In **Section 5** we comment on 'Chapter 4- Vision and Objectives' addressing consultation questions 1 to 3.
- In **Section 6** we comment on 'Chapter 5- 'Living in Test Valley' addressing questions 4-25;
- In **Section 7** we comment on 'Chapter 6- 'Working in Test Valley' addressing questions 26-32;
- In **Section 8** we comment on 'Chapter 7- 'Enjoying Test Valley' addressing questions 33-43
- In **Section 9** we comment on 'Chapter 8- 'Infrastructure in Test Valley' addressing questions 44-46
- In **Section 10** we summarise and conclude our representations.

2. SITE & SETTLEMENT CONTEXT

The Site and Surroundings

- 2.1 As noted in section 1, and set out in more detail in Appendix 2, the site comprises 52.6 Ha (130 acres) of agricultural land at Bere Hill, adjoining the built-up area to the south of Andover, and designated as countryside in the adopted Local Plan (dated 2016) under policy COM2.
- 2.2 The site is bound by existing residential development to the north, the A303 Andover Bypass to the south, Andover Golf Club to the west, with open agricultural fields to the east (known as Bailiffs Bottom) which are being promoted, in part, for development by Gallagher Estates Ltd, with the Picket Twenty residential development and allocation beyond that.
- 2.3 In terms of access, the site connects with Micheldever Road to the north east and Old Winton Road to the north west; whilst there are two PROWs crossing the site (one running north south and one east west past the existing Bere Hill Farm) and one, Ladies Walk that traverses the northern boundary, and is lined with a thick stand of mature trees creating a key local recreation feature.
- 2.4 Whilst the land is slightly elevated from the main settlement to the north, topography within the site is relatively flat and perfectly developable for residential dwellings, and the thick tree stand around Ladies Walk provides a large amount of visual containment, screening the site from the key views southwards from the town, and preserving the effect of the 'Andover Bowl'. The tree cover towards the southern boundary of the site along the A303 has also matured and provides effective screening in this direction too.
- 2.5 The site is not in a Flood Risk Zone and is not subject to any statutory or local environmental designation. There are some sites of local nature importance (SINCs) and TPOS adjacent to the site, but these can be incorporated into the development without any impact. The agricultural land classification for the site is predominantly Grade 3a, however this is the case for all the land around Andover.
- 2.6 In heritage terms, whilst there is a Grade II Listed Iron Bridge immediately bordering the site to the north, this can be integrated with the development with minimal impacts, and there are no other Listed Buildings or other heritage designations within or adjacent to the site.
- 2.7 The site is located in a very sustainable location within 900m of Andover Town Centre, which includes five supermarkets, a range of other national retailers, a Leisure Centre, College and various office and employment developments. There are also 2 doctors surgeries on the edge of the Town Centre and a hospital within 2.5km.
- 2.8 Furthermore, there are two convenience stores within 350m of the site which are accessible by foot; whilst Walworth Business Park, a major employment area, is just 1km to the north east. In respect of education, Wolverdene Primary School is located 600m to the north of the site, and there is a total of 8 schools within 1.5km.

- 2.9 The nearest Railway Station to the site is Andover, which is approximately 2.2 km to the north west of the site and provides direct services to London and other major towns; whilst the bus stops on Leigh Road and Shepherds Row within 350m of the site, offer localised services between Andover and its suburbs.
- 2.10 The site therefore benefits from a highly sustainable location in relation to Andover's existing local facilities and services.

Proposed Development

- 2.11 Peel are promoting this site for allocation within the emerging Local Plan Review for approximately 700 units. The illustrative layout below presents the latest scheme for the site. Peel are carrying out a number of updated assessments which may influence the layout going forward.
- 2.12 This site and the proposed development will also be supported by a Full Development Framework, which will add further support for the suitability and deliverability of this site.

Figure 2.1 – Latest Illustrative Masterplan



- 2.13 The above masterplan focusses the development on the southern and eastern sections of the site to avoid the higher ground to the north west and to provide a generous buffer to Ladies Walk footpath and the Iron Bridge. This also ties in with the development proposed by Gallagher Estates on the land to the north east, and therefore offers an integrated design across the wider land.
- 2.14 Development is set across 44 development parcels with a net developable area of approximately 20 Ha (49 acres), giving net densities of 35 dph. The development will have a clearly legible hierarchy of streets providing connectivity and access to local facilities.

- 2.15 Primary vehicular access could be taken through the adjoining Bere Hill & Grange development or the Council owned land further south at Bailiffs Bottom, to connect with the A3093 to the east. Secondary and emergency access is proposed through Micheldever Road to north, with associated pedestrian and cycle connections to Ladies Walk and the wider footpath network.
- 2.16 A full consultant team has been appointed to investigate a range of environmental and technical matters, and further reports and detail will be submitted to the Council as the Local Plan review process progresses. These ongoing assessment and reports could result in the latest masterplan being amended over time. Any changes to the scheme at Figure 2.1 will be supported by technical justification.

3. ANDOVER SETTLEMENT ANALYSIS

Andover's role within Test Valley

- 3.1 Andover is the largest settlement within Test Valley, located in the north of the borough, and accounting for 36% of the Borough's population based on the 2011 census. It had an estimated population of 46,298 in 2015, which is expected to increase by 8.2% to 50,452 by 2020¹. Andover is also a major employment centre, with around 23,500 jobs supported in the area in 2015². There were around 59,000 jobs in Test Valley in 2015, meaning Andover accounts for 40.0% of employment in the Borough.
- 3.2 Andover has direct train access into London Waterloo and the A303 Andover Bypass also forms a direct road route to London via the M3, making it an attractive commuter location.
- 3.3 Andover is classed as a Major Centre in the Settlement Hierarchy of the adopted plan along with Romsey, which is less than half its size (estimated at 19,441 in 2015), albeit Romsey forms a wider urban area in the south of the borough with several smaller settlements classed as Key Service Centres (Chilworth, North Baddesley, Nursling & Rowhams and Valley Park); whilst the remainder of the borough is made up of small rural villages.
- 3.4 The Council employ a split housing requirement for Northern and Southern Test Valley and have done since the 1980's reflecting the different housing market areas, as Southern Test Valley, which comprises the urban area around Romsey and surrounding villages, has a close relationship with the South Hampshire sub-region and is included in the Partnership for Urban South Hampshire (PUSH) SHMA; whilst Northern Test Valley (i.e. the remainder of the borough further north) is more of a self-contained Housing Market Area centred around Andover.
- 3.5 The Adopted Local Plan directs 67% of housing growth to Northern Test Valley, of which 90% is apportioned to Andover itself (so approximately 60% of the borough total), based on job forecasts and to allow Andover to support new retail and leisure facilities.
- 3.6 This demonstrates that Andover is the dominant settlement and employment centre within Test Valley, and the only significant settlement within Northern Test Valley. It has a fast-growing population and as such it would seem the obvious focus for further growth.

Growth within Andover

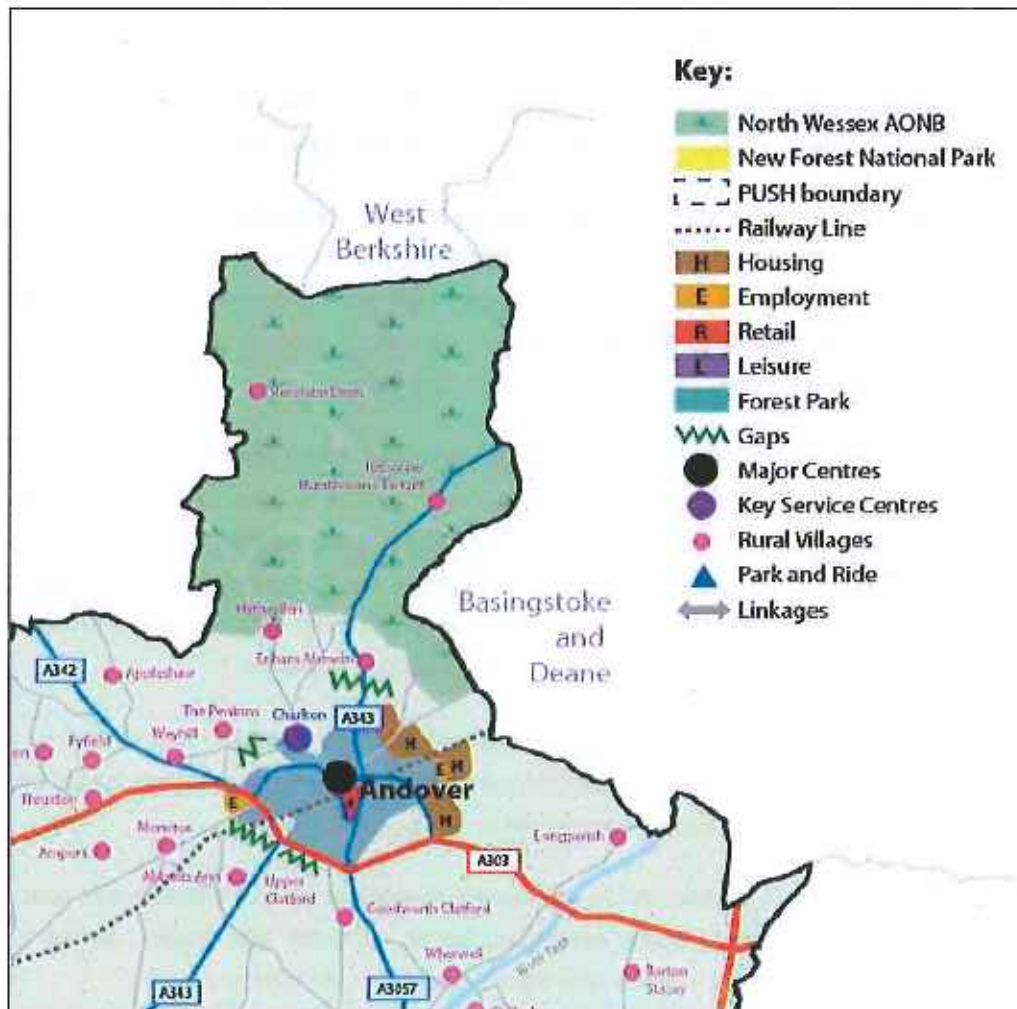
- 3.7 In terms of existing growth and development patterns within Andover, the key diagram from the Adopted Local Plan provides a useful overview of the existing position and expected growth up to 2029.

¹ Andover Town Profile (June 2017) Test Valley Borough Council 2015

² Office for National Statistics – Business Register and Employment Survey, 2015 – based on 4 wards of Andover used in section 4.

3.8 In headline terms this shows a large urban area, with the retail core slightly to the south of centre, the A303 bypassing the town to the south and the railway line running through the centre. The Key Service Centre of Charlton abuts the town to the north west, with several smaller rural villages just beyond to the west and south west (including Penton Mewsey and Upper Clatford), with fairly small levels of separation. There are protected local gaps to maintain separation to the south west, north west and north.

Figure 3.1 – Extract from Key Diagram – Adopted Local Plan 2011-2029



3.9 The land surrounding the urban area is designated countryside (under Policy COM2) with some Sites of Importance for Nature Conservation (SINCs) to the south, beyond the A303 and to the south east, beyond the existing residential development at Picket Twenty.

3.10 Beyond the Town Centre there are key employment locations at West Portway Industrial Estate and Andover Airfield Business Park to west and Walworth Business Park to the east. Andover Airfield Business Park is allocated under Policy LE9 for B1, B2 and B8 uses across approximately 48 Ha (119 acres); whilst an extension off 1.1 ha (27 acres) to Walworth Business Park is proposed for

B1(b), B1(c), B2 and B8 uses. These are both continuations of allocations from the previous 2006 Local Plan.

3.11 In terms of housing, growth is focussed to the east of Andover with two allocations at:

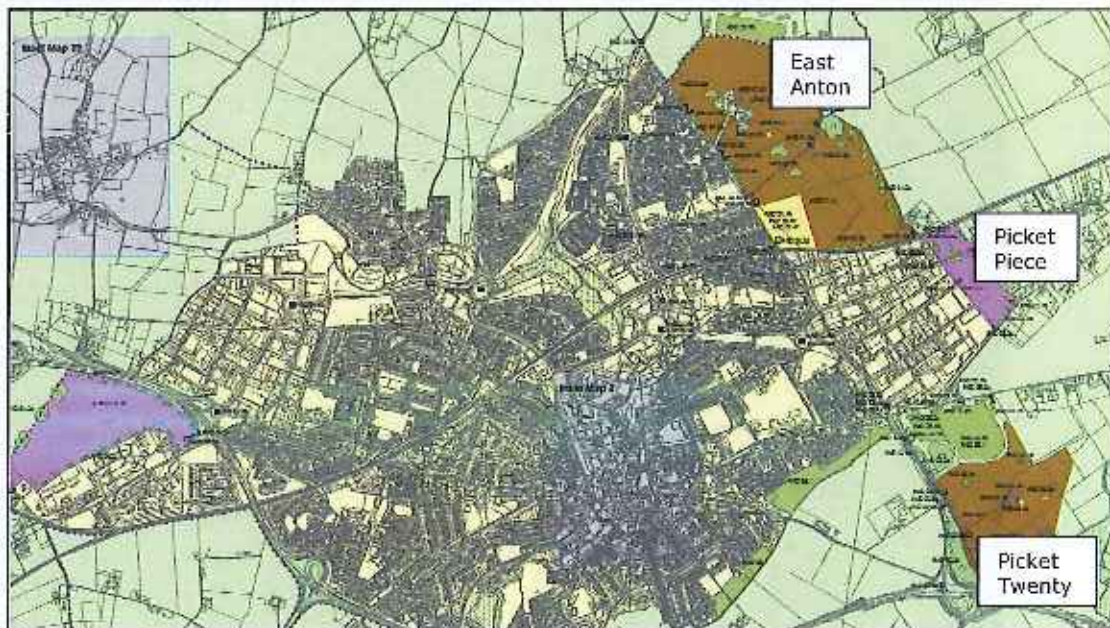
- **Picket Piece (Policy COM6)** – 400 dwellings and associated facilities;
- **Picket Twenty (Policy COM6A)** - 300 dwellings and associated facilities (extension to existing Picket Twenty Development);

3.12 There is a further mixed-use allocation within Andover Town Centre 'George Yard/ Black Swan Yard' (Policy LE14) which is proposed for retail, offices and up to 100 residential units. The remainder of the housing requirement in Northern Test Valley is to be delivered via committed developments, SHLAA sites and windfall developments.

3.13 As with the employment allocations, the pattern of housing growth to the east of Andover was largely established by the previous 2006 Local Plan, which ran until 2011, and allocated 3,700 across the following two sites (shown on the proposals map below):

- **East of Icknield Way/ East Anton (AND.01)** – 2,500 dwellings together with a range of associated facilities.
- **Picket Twenty (AND.02)** – 1,200 dwellings together with a range of associated facilities.

Figure 3.2 – Proposals Map- 2006 Local Plan



Current Housing Commitments in Andover

- 3.14 Based on the last two adopted plans, there are three significant residential developments east of Andover and we assess these in more detail below:

Picket Twenty – Persimmon Homes

- 3.15 This site has been brought forward by Persimmon Homes, who obtained outline consent for 1,200 homes back in 2008 (Ref: TVN.09275) and have been delivering steadily since then at approximately 120 units per year, with the 2017 Interim Five Year Housing Supply Statement ('2017 5YHLS Statement') confirming that there were 113 of 1,202 dwellings remaining in October 2017 with completion expected in 2018/2019.
- 3.16 A further additional phase of 14 units (Ref: 16/01461FULLN) was granted in December 2016 and is being built out. This suggests an overall total of 1,216 dwellings in Picket Twenty.
- 3.17 The development includes a local centre with an operational primary school, nursery and community centre. A large area of open space and playing fields, known as Harewood Common is located to the north, on an area of higher ground.

Fig 3.3 - Picket Twenty development



- 3.18 Persimmon Homes are also bringing forward the Picket Twenty extension, after gaining outline consent for 520 further dwellings in January 2018 (Ref: 16/03120/FULLN). It is understood that

this is expected to deliver at the same rate as the existing development and should therefore be complete by 2025, although this could be sooner based on current build out rates.

- 3.19 There is a further committed development to the north of Picket Twenty on land at Harewood Farm for 180 dwellings (Ref: 14/00774/OUTN) which gained outline consent in 2015, albeit a revised scheme is currently under consideration. Both were submitted by Mr M Raymond, and there is no housebuilder connected at present. The 2017 5YHLS Statement expects the site to begin delivering in 2019/2020 over a period of 4-5 years.
- 3.20 Overall this development is expected to deliver a total of 1,925 dwellings against a plan requirement of 1,500 dwellings, a surplus of approximately 425 dwellings.

Picket Piece –David Wilson Homes

- 3.21 Wates developments achieved outline consent for 530 units on this site in June 2011 (Ref: 10/00242/OUTN & APP/X3025/A/10/2140962) following an appeal. This has been built out in phases by David Wilson Homes through several Reserved Matters consents.

Fig 3.4 – Picket Piece development



- 3.22 According to the 2017 5YHLS Statement there were 108 of 529 dwellings remaining in October 2017 with completion expected in 2018/2019. Overall this development is expected to deliver a total of 529 dwellings against a plan requirement of 400 dwellings, a surplus of approximately 129 dwellings.

East Anton – Taylor Wimpey

- 3.23 Taylor Wimpey gained outline consent for 2,500 dwellings and associated employment, schools, local centres and other developments, back in 2008 (Ref: TVN.09258).

- 3.24 This has been built out in phases, and according to the 2017 5YHLS Statement, 1,503 dwellings have been completed with 997 remaining. These are projected to deliver at 160 a year and as such should be complete by approximately 2024.
- 3.25 Outline consent for a further 350 units was granted in 2015 on surplus land which had previously been set aside for a secondary school (Ref: 12/02497/OUTN).
- 3.26 Another 20 units were also granted consent as part of the development of the Northern Local Centre within East Anton (Ref: 15/00729/FULLN) and these were built out during 2017.
- 3.27 So overall this development is expected to deliver a total of 2,870 dwellings against a plan requirement of 2,500 dwellings, a surplus of approximately 370 dwellings.

Fig 3.5 - East Anton development



Other Developments

- 3.28 There are a number of other smaller developments within Andover which are included contained within the 5-year supply, but the majority are already under construction or expected to be completed in 2018/2019.
- 3.29 Allocation LE14 'George Yard/ Black Swan Yard' does not have permission yet and is not expected to begin delivering until 2023/24.

Housing Delivery Summary

- 3.30 This section has demonstrated that Andover has seen substantial housing delivery in recent years, with commitments over and above those planned for in the adopted plan, with this delivery expected to continue in the next 5 years, a fact that is reflected in the strong 5-year supply position put forward by the Council (who claim a 7.23 year supply at October 2017).
- 3.31 These accelerated delivery rates also suggest a buoyant housing market area with strong demand for new build homes, both for existing residents and people moving to the area.
- 3.32 That said, the trajectory in the Local Plan does show a reduction in delivery towards the end of the plan period (dropping from 409 in 2022/23 to 186 and below from 2025/26 onwards) and could leave the Council in a vulnerable position on five-year supply unless additional land is identified.

Summary and Conclusions

- 3.33 This section has demonstrated that Andover is the key settlement within Test Valley and has been the major focus for growth in successive Local Plans, and this has resulted in housing delivery in excess of Local Plan targets in recent years suggesting a robust and dynamic housing market within the town with the capacity for further growth.
- 3.34 It is clear from the plans presented that growth has focussed towards the east of the settlement in recent years, with the East Anton, Picket Piece and Picket Twenty delivering over 1,900 units already with a further 3,400 committed in the next 6-7 years.
- 3.35 In spatial distribution terms, East Anton and Picket Piece are connected to the main urban area to the north west and west respectively. However, Picket Twenty is slightly disconnected from the settlement, with the separation actually provided by the Peel land at Bere Hill, alongside the adjacent Gallagher's and Council land.
- 3.36 In light of the Picket Twenty development to the east, and the containment provided by the A303 to the south, the Bere Hill land represents an obvious infill opportunity and the next logical location for growth in Andover, and we revisit this in section 6.

4. ECONOMIC GROWTH IN TEST VALLEY

4.1 Before we consider the emerging development needs within Test Valley up to 2036, it is worth looking at recent economic trends and how these compare with the assumptions that underpinned the adopted Local Plan, and the evidence base that supported it, including the 2013 SHMA.

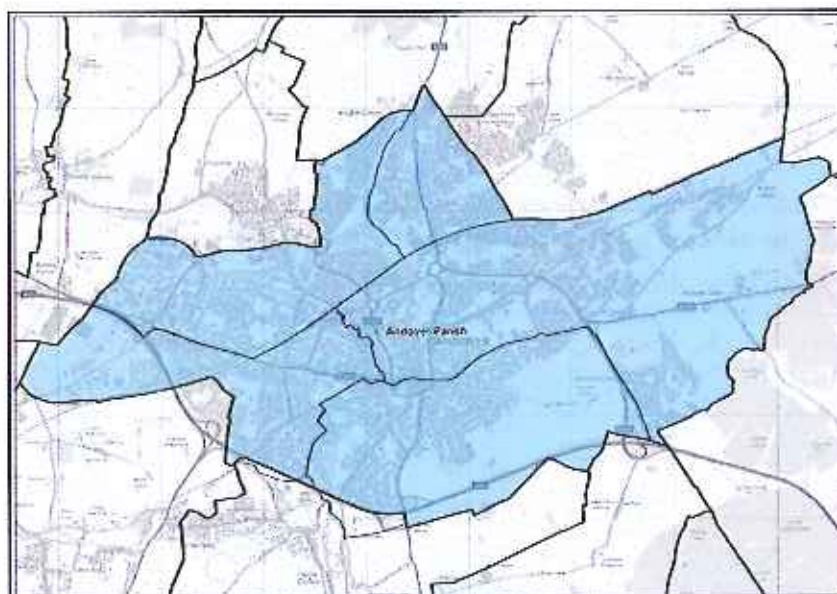
Employment Trends in Test Valley

4.2 Data published by the Office for National Statistics (ONS) allow for analysis of past trends. However, as a result of changes to the methodology used in producing the data, it is not possible to look at trends over a continuous period, therefore, the following timeframe has been analysed to allow for this fact:

- **2009-2015:** Jobs data published as part of the Business Register & Employment Survey (BRES) by ONS, which replaced the ABI.

4.3 Trends have been reviewed for Test Valley, alongside the South East region and Great Britain. Employment trends in the Andover Parish area have also been analysed. As the parish geography is not available in the BRES, a best fit approach has been used to define Andover. Data for four wards has been compiled to estimate figures for Andover: Harroway, Millway, Winton and St. Mary's Ward³. Part of Alamein Ward also falls within the north of the parish area. However, it has not been included in the analysis as only around a quarter of Alamein ward falls within Andover. Figure 1.1 presents Andover Parish area – split by the four wards.

Figure 4.1: Map of Andover Parish Area



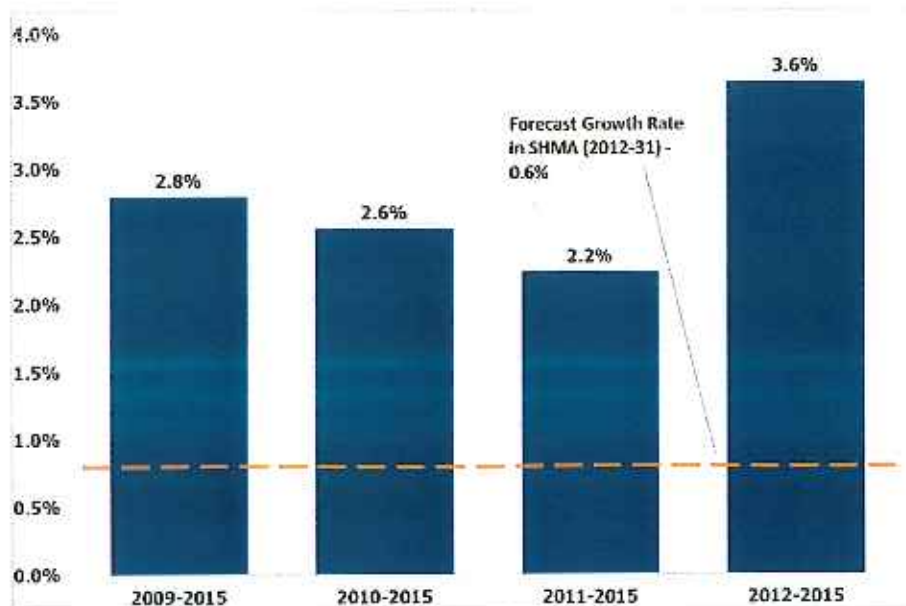
³ For the 2009 – 2014 time period the ward geography is based on 2009 CAS Wards. Between 2015 and 2016, the geography is based on Census Frozen Wards. The geographical areas do not change between the two, allowing comparison.

- 4.4 Between 2009 and 2015, Test Valley saw total employment increase by 9,000, equating to an annual growth of 2.8%. This was higher than the regional level of growth (1.2%), and national trends (1.0%). Employment growth in Andover over the six years was lower than the District, but still high at 2.3% per annum (3,000 jobs overall).

Employment Growth Assumptions

- 4.5 One of the main documents underpinning Test Valley’s Local Plan is the 2013 Strategic Housing Market Assessment (SHMA)¹, which provides long-term estimates of both housing need and demand between 2012 and 2031. On jobs growth, the SHMA projects an increase of 7,300 jobs in the District over the 19-year period (from 60,700 jobs in 2012, to 68,000 jobs in 2031). This equates to 384 jobs each year, or 0.6% growth per annum.
- 4.6 Figure 3.2 shows the annual growth rates in Test Valley between 2009 and 2015. For comparison purposes, it also includes the growth rate of 0.6% resulting from the forecast jobs growth in the SHMA. As already noted, between 2009 and 2015 the annual employment growth in Test Valley was 2.8%, more than four times the projected growth rate in the SHMA. The rate decreases to 2.6% when looking at the time period from 2010 to 2015 and drops to 2.2% between 2011 and 2015, although this is still over twice the SHMA’s projected growth rate. The annual employment rate increased considerably to 3.6% per annum between 2012-15. Each of the average annual rates of increase are considerably higher than the SHMA’s employment growth scenario of 0.6% per annum.

Figure 4.2 - Annual growth in jobs in Test Valley, 2009-2015



Source: ONS-Business Register & Employment Survey

¹ Test Valley Borough Council 2013 Strategic Housing Market Assessment: Justin Gardner Consulting, January 2014.

- 4.7 Andover follows a similar trend to Test Valley in terms of employment growth rates. The annual growth rate was 2.3% between 2009 and 2015, remaining the same between 2010 and 2015. Between 2011 and 2015, the annual jobs growth in Andover dropped slightly to 2.2%, before increasing to 3.0% between 2012 and 2015. Again, each of these annual growth rates are higher than the SHMA's annual employment growth target of 0.6%.
- 4.8 If the area continues to see faster levels of jobs growth, this is likely to put increased pressure on boosting housing supply. Without new homes, there is a risk that Test Valley and Andover have insufficient dwellings for people moving to the area for work.

5. VISION AND OBJECTIVES (CHAPTER 4)

Q1: What is good about living and/or working in Test Valley?

- 5.1 It is clear from the socio-economic profile provided within section 3 of the Issues and Options document that this is a relatively affluent area with a strong local economy, reflected in above average house prices, and levels of home ownership, employment, income and education; both in the regional and national context.
- 5.2 The early review of the Local Plan also suggests a proactive and responsive local authority as noted in our introduction, suggesting that there are many positives to living and working in Test Valley.

Q2: What could be improved about living and/or working in Test Valley? And...

Q3: What should the Local Plan aspirations be for the next 20 years?

- 5.3 Whilst the majority of socio economic indicators noted in section 3 are positive, there are others which raise concerns, not least affordability, which is acute in Andover (with 40.4% of residents unable to afford housing without subsidies); and an ageing population which is well above the Hampshire average (at 43 elderly people per 100 working age by 2024, compared to the average of 39) and will increase pressure on local services and lead to imbalances in the local labour market in the future if it is not addressed.
- 5.4 One obvious way to address both these issues is to boost the supply of housing and ensure that this is aligned with employment needs going forwards to 2036. Increasing housing provision reduces affordability pressures by increasing supply of both market and affordable housing, and provides wider choice in the market to attract younger economically active residents to rebalance the local economy.
- 5.5 It is clear from the previous section that housing and employment needs within the adopted Local Plan are not aligned as the housing requirement within the plan was based on a jobs growth figure of just 0.6% per annum, whereas actual job growth across the period 2011-2015 was considerably faster at 2.2%.
- 5.6 Therefore a key Local Plan aspiration for the next 20 year should be to ensure that housing and employment needs are fully aligned otherwise this could stunt the economy, lead to unsustainable commuting patterns and generate imbalances in the housing and labour market.

6. LIVING IN TEST VALLEY/ HOUSING POLICIES (CHAPTER 5)

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

- 6.1 Paragraph 60 of the Revised NPPF confirms that local plan submitted after 24th January 2019, as this one will be, should use the Governments Standard Method for calculating housing need unless exceptional circumstances justify an alternative approach.
- 6.2 In the case of Test Valley this has led to a reduction in need, from 588 dpa in the adopted plan to 569 dpa (based on the 2014 projections), a reduction of 3.3%.
- 6.3 However, it is important to note that Paragraph 11 of the Revised NPPF confirms that for plan-making, the presumption in favour of sustainable development means that:
- Plan should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change; and
 - Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas...
- 6.4 As such, the Standard Methodology figure must be treated as the minimum starting point for housing delivery. The Council then needs to consider and take account of a number of important factors including:
- Can the neighbouring authorities within (and perhaps outside) the housing market area accommodate their own housing requirements as calculated by the standard methodology? If not, the NPPF obligates the Council to determine if Test Valley could suitably accommodate them?
 - Would simply achieving the standard methodology figures provide for a sufficiently flexible plan that would meet the needs of the area or should additional capacity be built into the plan? This could take a range of forms such as the identification of additional sites, back up sites, or strong and practical monitoring and review policies.
 - Would the use of the standard methodology lead to a 'positive' plan being prepared and one that meets the needs of all forms of development?
- 6.5 For instance, if there was evidence that demonstrated that the use of the Standard Methodology would not allow the Local Planning Authority to meet forecast or planned jobs growth in the area, or would lead to unsustainable commuter or migration patterns, there would be a strong case to suggest the plan would not meet the objectives and presumption in favour of sustainable development and could therefore be rendered unsound.
- 6.6 In short, the Standard Methodology figures only represent one piece of evidence in relation to the preparation of a sound development plan and represents a 'minimum' figure as confirmed by

paragraph 11 and paragraph 60 of the Revised NPPF. Many other considerations and evidence can and will impact on the final housing requirement figure set out in a Local Plan.

6.7 Upon first review, we note that the very recent changes to the NPPG, issued yesterday on 13th September, back up our above interpretation of the NPPF in this regard. Indeed, under the Housing Needs Assessment section, the following points are raised

- 002 – The standard method set out below identifies a minimum annual housing need figure. It does not produce a housing requirement;
- 003 – The standard methodology is not mandatory and alternative approaches can be used but they are likely to be scrutinised more closely at examination (but noting the above that must be an alternative to the minimum);
- 027 - The total need for affordable housing will need to be converted into annual flows...An increase in the total housing figure included in the plan may need to be considered where it could help deliver the required number of affordable homes.

6.8 Under the question 'When might a higher figure than the standard method need to be considered?', the NPPG states the following at Paragraph: 010 Reference ID: 2a-010-20180913

'The government is committed to ensuring more homes are built and are supportive of ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides the minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore there will be circumstances where actual housing need may be higher than the figure identified by the standard method.

*Where additional growth above historic trends is likely to or is planned to occur over the plan period, an appropriate uplift may be considered. This will be an uplift to identify housing need specifically and should be undertaken prior to and separate from considering how much of this need can be accommodated in a housing requirement figure. Circumstances where this may be appropriate include, **but are not limited to:***

- *where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. Housing Deals);*
- *where strategic infrastructure improvements are planned that would support new homes;*
- *where an authority has agreed to take on unmet need, calculated using the standard method, from neighbouring authorities, as set out in a statement of common ground;*

In addition authorities should also consider:

- *previous delivery levels. Where previous delivery has exceeded the minimum need identified it should be considered whether the level of delivery is indicative of greater housing need; and*
- *recent assessments of need, such as a Strategic Housing Market Assessments (SHMA). Where these assessments suggest higher levels of need than those proposed by a strategic policy-making authority, an assessment of lower need should be justified.'*

- 6.9 It is also noted that paragraph 60 states the standard methodology should be utilised to determine the minimum number of homes needed - 'unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and signals'.
- 6.10 Bearing in mind the standard methodology figure is a minimum figure, and noting the aforementioned guidance in the NPPG (as quoted above), it is clearly not logical to assume that 'exceptional circumstances' have to be demonstrated to justify the use of a higher Local Plan figure. Indeed, the Government's objectives are to boost housing supply and any authority that can sustainably deliver more homes will undoubtedly be welcomed.
- 6.11 The exceptional circumstances test, therefore, must apply to any authority which chooses to justify and deliver a lower housing needs requirement as its starting point for the Local Plan preparation. Notwithstanding this, we consider there are compelling reasons and some exceptional circumstances that would warrant Test Valley opting for a higher housing need requirement, which we address under Question 5.
- 6.12 Peel also have some fundamental concerns with the standard methodology as a whole. Notably, the standard methodology removes additional economic growth and instead pegs the housing requirement to past trends and development patterns. At its starkest, this significantly accentuates existing inequalities across certain geographies, such as the north/south divide, but it can also be witnessed, and lead to disparities, at more local levels too.
- 6.13 The standard methodology is also based on a top down assessment stemming from the government's national target of 300,000 homes per year, based on the 2014 projections. Notably, the 2014 projections were the latest available at the time in November 2017 and supported total growth of 266,000 dpa, so 10% short of the 300,000 figure. In short, the methodology is retro-fitted.
- 6.14 It is pertinent to note that the government have now acknowledged this issue. At the outset of the NPPG section entitled 'Housing Need Assessments', the following statement is made:

'The government is aware that lower than previously forecast population projections have an impact on the outputs associated with the method. Specifically it is noted that the revised projections are likely to result in the minimum need numbers generated by the method being subject to a significant reduction, once the relevant household projection figures are released in September 2018.'

In the housing white paper the government was clear that reforms set out (which included the introduction of a standard method for assessing housing need) should lead to more homes being built. In order to ensure that the outputs associated with the method are consistent with this, we will consider adjusting the method after the household projections are released in September 2018. We will consult on the specific details of any change at that time.

*It should be noted that **the intention is to consider adjusting the method** to ensure that the starting point in the plan-making process is consistent in aggregate with the proposals in Planning for the right homes in the right places consultation and continues to be consistent with ensuring that 300,000 homes are built per year by the mid 2020s."*

- 6.15 Whilst we have not yet seen or reviewed how the government intends to change the methodology, it seems likely that the basic methodology and inputs will stay the same (i.e. government projections with adjustments for affordability market signals and some form of cap) and that the caps and adjustments will simply be increased to meet the higher requirement. If this is the case, it will clearly exacerbate existing trends and accentuate inequalities even further. However, we will need to see what the Government propose, and we will respond accordingly.
- 6.16 What is clear is that there is still some uncertainty relating the standard methodology and the approach to be used. Therefore, we do not believe Test Valley should fundamentally rely on the standard methodology until the issues set out above are addressed, and we reiterate again, that even when it is utilised it must be treated as a minimum requirement and is simply the starting point for determining the number of homes a Local Plan must provide. It does not represent a cap and its use does not automatically result in a sound plan where all development needs are met.
- 6.17 Based on past and anticipated employment growth within the area, we believe there are compelling and sound reasons within Test Valley that would support an uplift from the standard methodology to support economic growth and these could be regarded as representing 'exceptional circumstances', notwithstanding our comments above. Moreover, Test Valley would be an ideal location to address any shortfalls or mismatch between the standard methodology approach and the government's overall target for 300,000 home are built per year.

Q5: Should the Local Plan increase its housing requirement to help support economic growth?

If yes, do you have any evidence to support this?

- 6.18 It is our strong view that the emerging Local Plan should increase its housing requirement to support economic growth.
- 6.19 Firstly, the economic analysis within section 4 has demonstrated that actual jobs growth within Test Valley since the adopted plan period began in 2011 has outstripped anticipated growth by some distance (2.2% compared to 0.6% from 2011-2015).

- 6.20 The adopted housing target of 588 dpa was an employment based figure (based on a range of 570-590 dpa) which was specifically intended to support jobs growth across the plan period (rather than a demographic or migration based figure). Given it clearly hasn't done this over the first 4 recorded years of the plan period then it should be increased for the emerging plan period to ensure that housing and employment needs are aligned going forward.
- 6.21 Indeed, it is extremely important that there are sufficient new dwellings to accommodate people moving to the area for work and to provide choice in the market. Failure to do could lead to unsustainable commuting patterns, with people forced to travel long distances to work, and may eventually stifle employment growth if businesses are struggling to attract sufficient local staff.
- 6.22 Secondly, we note that the adopted Local Plan focuses 90% of North Andover's housing growth is on Andover itself to allow Andover to support new retail and leisure facilities, to maintain its role as a Major Centre and limit people travelling out of the borough for their shopping and leisure needs. Clearly an increase in the housing requirement will help to support additional retail and leisure jobs, both directly by providing housing for new workers, and indirectly with the increased footfall and expenditure that new residents will generate for local shops and leisure services.
- 6.23 As such we recommend the Council increase its emerging housing requirement from 588 to support existing levels of job growth and the vitality and viability of the Town Centre in accordance with paragraphs 80 and 85 of the Revised NPPF.

Q6: Do you think the HMA boundary is broadly right? If not, how and why do you think it should be changed?

- 6.24 The existing HMA boundary was considered appropriate in the 2013 SHMA and endorsed by the Inspector in his report in January 2016, and we have not seen any more up to date evidence confirming its level of containment or any other measure.
- 6.25 That said, this position should be reviewed and evidence as part of the emerging plans as housing market areas do change, and housing needs should always be assessed in relation to relevant Housing Market Area (NPPG - 2a-008-20140306); and we reserve the right to provide further comments once evidence has been produced.

Q7: Are there any other approaches to distributing development across the Borough that we should consider? /Q8: Do you have any comments on the approaches suggested above?

- 6.26 This section of the Issues and Options document provides a summary of the existing/ adopted approach, which concentrates 'development to existing main settlements where services and jobs are most accessible' before settling out five alternative 'high-level' options:
- Community led distribution;
 - Proportionate distribution to parishes;
 - Local Plan Allocations;

- New Village; and
- Mixed approach.

6.27 We provide initial comments on each of these options before setting out our preferred approach, with reference to existing development patterns we identified in Andover as set out in section 3.

Community led distribution

6.28 The principle of Community led distribution is admirable and would certainly meet the requirements of the Localism Act; however in reality allowing communities to set their own housing requirements is unlikely to deliver significant levels of residential development, particularly in an area such as Test Valley with a number of small rural parishes, many of which are acknowledged to have low levels of sustainability. This is due to a lack of suitably located and sized sites and a general resistance/ opposition to housing growth amongst many such communities (indeed the consultation itself notes that some parishes have chosen not take part in the process).

6.29 That said, there may be some communities who are seeking additional growth to support the vitality of their communities, either through increased patronage of local facilities or the rebalancing the local population/ workforce, in line with paragraph 78 of the Revised NPPF, and this is to be welcomed as a part of any emerging strategy; although as noted this is unlikely to deliver significant growth and would need to be combined with other approaches.

Proportionate distribution to parishes

6.30 The principle of proportionate distribution has some logic to it, and will clearly work well for the largest and most sustainable settlements such as Andover and Romsey; however there will be other settlements with relatively large populations, but with constraints on growth, where meeting the proportionate needs would lead to development on unsustainable sites, contrary to the NPPF. As such, it is our view that population size should be used as a guide to ensure that sites are proportionate to the size of the settlement they are in, rather than driving where sites are located.

Local Plan Allocations

6.31 Our analysis of recent existing housing delivery within Andover, and discussions with Officers, suggests that allocations in the last two Local Plans have been very successful in delivering significant and high quality residential developments, over and above planned targets, and along with supporting services and community uses.

6.32 As such we would recommend that the Council allocate further sites in the Emerging Plan.

New Village

6.33 Garden Communities are clearly a priority for the current government and whilst they are not specifically mentioned in the Revised NPPF, an updated Garden Communities prospectus was issued

in August 2018 which seeks further applications for garden settlement status to supplement the 23 pilot schemes already planned.

- 6.34 We are supportive of the principle of Garden Settlements however feel that such an approach unlikely to be appropriate in Test Valley for a number of reasons. Firstly the government are prioritising Garden Towns of 10,000 units + and are only considering smaller Garden Villages that are strong in other aspects. Whilst we are recommending an increase to the housing requirement figure in the emerging plan we do not anticipate the housing shortfall will be such that a settlement of this scale will be required, and consider that the majority of the emerging requirement can be made up through extensions to existing sustainable settlements such as Andover.
- 6.35 Secondly, there is no obvious location for such a settlement, given these are meant to be freestanding but with good road and transport links; where Test Valley is characterised by large well connected urban areas to the north and south of the borough with a loose network of village in between focussed along the main roads.
- 6.36 Thirdly, it is unclear how such a settlement would align with the Council's economic aspirations which are focussed on maintaining and reinforcing Andover's role as a key employment and retail centre, as clearly a new settlement elsewhere in the authority would compromise this and provide competition.

Mixed approach

- 6.37 We would agree that the preferred approach should be a hybrid of the above options as set out below:

Preferred Approach to Distribution

- 6.38 Overall we would recommend a continuation of the current strategy, focussing development on existing main settlements such as Andover, through additional allocations, supplemented with community led distribution via Neighbourhood Plans in those parishes that want to see growth. This will ensure the most sustainable settlements receive the most growth, whilst also supporting rural communities and therefore fully accords with the NPPF.
- 6.39 Whilst we do not propose a housing requirement figure at this stage, this is likely to be over 600 dpa, to take account of the economic uplift required to support jobs growth. When this is extended beyond the adopted plan period to 2036 (7 years) this will generate a need for at least 4,200 additional dwellings, and if this is combined with any shortfall generated in the latter years of the adopted plan period (if supply dips after 2025 as expected), then this could increase to between 4,500 and 5,000 dwellings.
- 6.40 Even if multiple communities follow Neighbourhood Plan this is still going to require several thousand additional units coming through allocations in the main settlements, such as Andover.

Further Allocations in Andover

- 6.41 Section 3 sets out the levels of housing growth and distribution in Andover based on the last two adopted plans, which focussed on the east of the settlement, with the Picket Twenty development leaving an obvious Infill parcel comprising the land at Bere Hill Farm, alongside the adjacent Gallagher Estates site to the east (Bere Hill & The Grange) and the Council land to the south east.
- 6.42 This site is well connected with the Town Centre and is contained by existing development and the A303 to the south; whilst Section 2 demonstrates this is a deliverable site with a willing landowner, and no unsurmountable technical constraints preventing development.
- 6.43 One key factor which has influenced the location of the existing allocations and is not evident from overhead plans is topography, as the town of Andover sits within a bowl surrounded by higher land around the 90m contour, and the Council have previously resisted any development above this contour line to maintain views in and out of the town. This is reflected in the existing allocations which have avoided development on the higher ground (with Picket Twenty siting it's open space and playing fields on the higher ground). However this has also led to Picket Twenty being a little disconnected from the main settlement and Town Centre.
- 6.44 It is our strong view that Bere Hill Farm site can be developed without any landscape impacts on the wider town. This is mainly due to the containment provided by the tall and thick stand of trees around Ladies Walk to the north of the site. Ladies Walk is sited at the rim of the Andover Bowl and screens views into the site from the town to the south ensuring that development will be well contained, preserving the feel of the wider bowl.
- 6.45 In terms of where else new development in Andover might be directed, section 3 outlined how there are number of smaller rural villages to the west and south west of the town (including Penton Mewsey and Upper Clatford), with fairly small levels of separation, with protected local gaps between some of these, limiting growth potential in some directions.
- 6.46 The Sustainability Appraisal in the adopted plan (from the Reg 19 stage, November 2013) also assessed general areas for growth, splitting them into 7 broad areas of search (along with two areas outside Andover).

Fig 6.1 - Sustainability Appraisal of Broad Areas around Andover

Table 30: Summary of the Performance of the Broad Areas of Search for Northern Test Valley
 (Needs to be read in conjunction with associated commentary, contained within Appendix 9)

Broad Area of Search	Criteria												
	1. Flooding & groundwater	2. PDL	3. Soil and geology	4. International biodiversity	5. Biodiversity	6. Character	7. Heritage	8. Communities	9. Housing need	10. Economy	11. Leisure & culture	12. Accessibility	13. Deliverability
Andover (and Charlton)	+/-	+	+	+	+	+	+/-	++	+	++	++	+	+/-
North of Andover	+	-	+/-	+	+	+/-	+/-	+	+	+	+	+/-	+/-
North East of Andover	+	-	+/-	+	+	+/-	+/-	+	+	+	+	+/-	+/-
North West of Andover	+	-	+/-	+/-	+/-	-	-	+	+	+	+	+/-	+/-
South of Andover	++	-	+/-	+	+/-	-	+/-	+	+	+	+/-	+	+/-
South East of Andover	++	-	+/-	+	+/-	+/-	+/-	+	+	+	+	+/-	+/-
South West of Andover	+	-	+/-	+/-	+/-	-	+/-	+/-	+	+	+	+/-	+/-
Edge of Ludgershall	+	-	+/-	+/-	+	-	+/-	+/-	+	+	+/-	+/-	+/-
Stockbridge	-	-	+/-	+/-	-	-	-	+	+	+	+/-	-	+/-

Key to the Symbols:

Performs very well	++
Performs well	+
Mixed performance	+/-
Performs less well	-
Performs poorly	-
Depends on implementation	-
Uncertain	?
No Effect	0

Note: The symbols of performance should not be considered in isolation, they represent a broad indication that need to be read in conjunction with the commentary contained within Appendix 9.

- 6.47 By applying a comparative scoring system to these rankings (from 1= performs poorly; to 5= performs very well) it demonstrates that the land South of Andover, which includes the land at Bere Hill, scores well (44), finishing third behind Andover and Charlton (52- which presumably scores well as it is a separate Key Service Centre) and South East of Andover (45), which includes Picket Twenty.
- 6.48 Accordingly, the site outscores North East Andover (43) which includes Picket Piece and East Anton.
- 6.49 This suggests that land to the south of Andover should have been considered in the previous plan, and should definitely be considered in the emerging plan.
- 6.50 It is acknowledged that the Bere Hill Farm site score less favourably in the individual site assessments later on in the Sustainability Appraisal, however it is our strong view it should be considered for allocation alongside the adjacent Council land and Gallagher's site as a sustainable urban extension and should therefore be scored as part of a wider allocation.
- 6.51 Another benefit of the Bere Hill Farm site is that it presents an opportunity for a lower density aspirational development, due to its leafy attractive setting, which would integrate well with the existing Picket Twenty development which is dominated by smaller 2-3 bed starter homes, offering a step up on the housing ladder for Picket Twenty residents and offering choice and mobility in the local market.
- 6.52 As such we respectfully request that the Bere Hill Farm site be considered for allocation on the basis of the above.

Q9: How should the settlement boundaries be defined in the next Local Plan?

- 6.53 As noted in the supporting text at paragraph 5.28, settlement boundaries should be drawn along clear physical boundaries, based on existing buildings and curtilages.

Q10: Do you think we should continue with seeking up to 40% of new homes to be affordable, or should we change the percentage?

- 6.54 It is important that any prescriptive affordable requirement should be based on up to date evidence and should be subject to detailed viability testing at a range of scenarios. Without such evidence at this stage it is impossible to say if the 40% requirement is still appropriate.
- 6.55 In respect of viability we would highlight representations made by Peel to the NPPF consultation in Spring 2018, that any policy costs to be applied to development should provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 6.56 It would also be worth considering a variable affordable requirement based on different market locations to provide flexibility and maintain viability across the borough.

Q11: What should the trigger be for seeking affordable housing?

- 6.57 We consider the existing 15 unit threshold to be reasonable, as no evidence has been presented to suggest that this is compromising affordable delivery currently.

Q12: Should we allow market housing on rural affordable exception sites?

- 6.58 We support the provision of market housing on rural exception sites where this facilitates the delivery of affordable units, as this accords with paragraph 77 of the Revised NPPF.
- 6.59 We also note that this is the sort of development that might be supported in the smaller parishes through the community led distribution/ Neighbourhood Plan process.

Q13: How should we meet the requirement for Self-Build plots? Should it be as part of sites over a certain threshold or separate sites?

- 6.60 The supporting text (para 5.37) confirms that demand for self-build plots is low in Test Valley, and therefore any prescriptive or threshold requirement would not be appropriate.
- 6.61 Accordingly, we would recommend a flexible policy that allows for the requirement to be met through dedicated sites or as part of wider market housing developments,

Q14: Should we establish a policy that covers dwellings in the countryside which are of exceptional quality?

- 6.62 This issue is already covered by paragraph 79 of the Revised NPPF and does not need to be duplicated unless it provides more detailed criteria on what the Council considers to constitute 'exceptional quality'.

Q15: Should the Council change its approach and set out a requirement that certain sites should provide for the needs of such groups as the elderly?

- 6.63 Before deciding on an approach or considering any sites, the Council will need to prepare a new SHMA to confirm exactly what its elderly requirements are. Moving forward it should identify dedicated sites for elderly care where possible alongside a flexible policy targeting a level adaptable housing within market housing developments.
- 6.64 The Council will also need to give careful consideration as to how evidence of elderly need is translated into any policy requirement, as elderly needs can vary greatly with some requiring new purpose built accommodation; but many others preferring to stay within their existing 'family home' and adapt it over time as required. As such it is unlikely that elderly needs will need to be met in full with purpose built or even adaptable housing.

Q16: Should we include a policy requires a mix and type of housing, or should the housing market inform what mix and type of housing to build?

- 6.65 Any policy on mix and type of housing should be based on up to date evidence, with flexibility to change over time, and to allow exceptions for more specialist or site specific developments where it is not practical to deliver a wide mix of uses (i.e. a park home development, or PRS apartment scheme)

Q17: Should we restrict the size of replacements and extensions to dwellings in the countryside to keep a range of dwellings?

- 6.66 Rural communities should be supported in line with paragraph 78 of the Revised NPPF and as such should not have onerous restrictions placed on them when extending or replacing their homes, particularly if this is their place of work.

Q18: Should the Council establish density standards in the Local Plan?

- 6.67 Paragraph 123 of the Revised NPPF does encourage Councils to employ minimum density standards in Town Centres and areas that are well served by public transport to ensure the efficient use of land.
- 6.68 That said there is no evidence of land being used inefficiently in Test Valley (indeed we are aware that the Picket Twenty development is at a very high density), so prescriptive standards are unlikely to be required, but target densities in accessible areas should suffice.

Q19: Do you think we should establish internal space standards for future homes?

- 6.69 The NPPG did introduce a Nationally Described Space Standard (para 56-018-20150327) within the Housing Technical Standards in March 2015; however this can only be applied if the Council provide evidence of the following:

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.*

6.70 There is no suggestion from the existing evidence base to suggest substandard spaces are an issue in Test Valley, so we would suggest this is unnecessary at this stage.

Q20: Do you think we should establish standards for accessible, adaptable and wheelchair user dwellings?

6.71 Peel fully support the provision of housing for older people and accept that there is a need for such housing in Andover, with the Issues and Options document noting an aging population and massive projected growth in over 85s.

6.72 As with the space standards, the NPPG introduced optional standards for wheelchair accessibility within the Housing Technical Standards, in line with Building Reg requirements; however these can only be applied if evidence is gathered on the following:

- *the likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*
- *the accessibility and adaptability of existing housing stock.*
- *how needs vary across different housing tenures.*
- *the overall impact on viability.*

6.73 Clearly the SHMA will need to be updated to consider the above and whether to seek the optional standard.

6.74 One thing to reiterate is that evidence of an elderly population does not necessarily translate through to a requirement for adaptable dwellings, as many will prefer to adapt their existing home; whilst others will choose to move to dedicated and specialised extra care facilities.

6.75 In addition, the added costs for building adaptable homes are often underestimated and can seriously undermine viability in certain locations.

Q21: Should the Local Plan set out a definition of rural worker? And if so what should it include?

6.76 We have no comments on this matter at this stage but Peel reserve the right to make comments in the future.

Q22: How do you think we should best meet Gypsy, Traveller and Travelling Showpeople's needs?

6.77 Such needs should be met through the identification of specific dedicated sites in line with the guidance within the Planning policy for traveller sites (August 2015).

6.78 The 2016/2017 AMR confirms that 4 net additional gypsy pitches were provided in the monitoring year and noted that the position was improving which is positive.

Q23: Do you agree that we should have a specific policy on health and wellbeing? What sort of issues do you think it should cover?

6.79 Peel welcome Council's aspiration to support health and wellbeing, in line with section 8 of the NPPF; but would suggest that this is a strategic objective and underlying aspiration within all policies, rather than through a specific policy which could end up being vague and ineffective.

Q24: Should some types of facilities and services be given more protection than others?

6.80 We have no comments on this question at this stage but we reserve Peel's right to make comments in the future.

Q25: Should we continue to protect all existing community facilities and services?

6.81 It is our view that existing community facilities and services should only be protected where they are occupied or there is robust evidence that they will be reoccupied in a reasonable timeframe and/or are still suitable and viable for the permitted use.

7. WORKING IN TEST VALLEY/ EMPLOYMENT POLICIES (CHAPTER 6)

Q26: Should we allocate more land to enable more choice and flexibility to the market?

7.1 In short yes, allocating additional employment land to that required provides choice, flexibility and mobility in the employment market allowing businesses to move premises more easily and to grow and innovate.

7.2 This has been particularly important in recent years as employment requirements are changing all the time with technology and other innovations, particularly in areas such as logistics.

Q27: What are your views on promoting smaller workspaces within the Borough?

7.3 The number of small businesses is clearly continuing to grow and therefore the Council must respond to this and plan for smaller workspaces.

Q28: What provisions or controls should be made relating to people working from home?

7.4 Working from home should be encouraged as it carries sustainability benefits, by saving on car journeys, and as such it should not be controlled or restricted, particularly as there is limited evidence on existing 'work from home' patterns.

Q29: Should the Council continue to encourage retail uses within primary frontages or should a more flexible approach be taken with a greater range of uses being allowed?

7.5 We have no comments on this question at this stage, but we reserve Peel's right to make comments in the future.

Q30: How should we best continue seeking apprenticeships?

7.6 We have no comments on this question at this stage, but we reserve Peel's right to make comments in the future.

Q31: What should be included in any tourism policy in the next local plan?

7.7 We have no comments on this question at this stage, but we reserve Peel's right to make comments in the future.

Q32: Should there be measures to support tourism proposals, and if so, what?

7.8 We have no comments on this question at this stage, but we reserve Peel's right to make comments in the future.

8. ENJOYING TEST VALLEY/ ENVIRONMENTAL POLICIES (CHAPTER 7)

Q33: Should we continue to retain the principle of Local Gaps? Should we define specific boundaries or a more general policy which aims to avoid coalescence?

- 8.1 Peel support the principle of local gaps where they are used to avoid coalescence and preserve gaps of local landscape importance; rather than as an arbitrary means to limit development.
- 8.2 We understand from discussions with the Council that these are valued by locals within Test Valley for genuine landscape and separation purposes and as such we support their retention.

Q34: Should the Local Plan identify and designate Local Areas of Green Space or should this be undertaken via Neighbourhood Plans?

- 8.3 It is our view that this should be done through Neighbourhood Plans or within development proposals unless there is specific evidence that such areas are under threat.

Q35: Should the next Local Plan continue to promote water efficiency from new developments?

- 8.4 We agree that the Council should promote water efficiency within new developments and that this should be done through the Building Regulations Regime, as set out in the Housing Technical Standards March 2015; noting that the optional water standard of restricting use from 125 to 110 litres/person/day can only be used where there is clear evidence of local need.

Q36: Should we identify suitable sites for renewable energy, including onshore wind, in the Local Plan?

- 8.5 We have no comments on this question at this stage, but we reserve Peel's right to make comments in the future.

Q37: If so, which area of the Borough would be appropriate and for which types of technology (e.g. wind turbines, solar photovoltaic panels)?

- 8.6 We have no comments on this question at this stage, but we reserve Peel's right to make comments in the future.

Q38: Should the Local Plan encourage energy efficiency when constructing new development?

- 8.7 Peel are fully supportive of energy efficiency in new developments, but would reiterate the Council's own supporting text at paragraph 7.15 which confirms that sustainable construction standards are best dealt with via the Building Regulations Regime and that this will be subject to review later this year, so it would be worth monitoring the outcome of that before deciding how to proceed.

Q39: How can we improve design quality within the Borough?

- 8.8 Design quality can be improved through early and positive engagement between applicants, the planning authority and local community, to clarify expectations and reconcile local and commercial

Interests, and paragraph 128 of the NPPF confirms that applicants who engage in this way should be looked upon more favourably.

- 8.9 Therefore if Test Valley follow this approach it should help secure early engagement by applicants and better designed schemes.
- 8.10 The supporting text at paragraph 7.18 also notes an Important point which seems to have been dropped from the Revised NPPF, that Local Plans promote local distinctiveness but should not impose particular architectural styles.

Q40: Should the local plan be specific on the type of open space to provide or should it take account of existing provision/future requirements?

Q41: Should we continue to set a per dwelling or per hectare standard for recreational open space on residential developments? Or, should the Council require the provision of recreational open space on residential developments to be based on the needs set out in the Playing Pitch Strategy?

- 8.11 Any open space requirements in new developments must be based on up to date evidence of need. This is particularly relevant for the Council in Test valley, as we understand they look to adopt and manage all open space within private developments and therefore will want to ensure that they are only managing land that is needed and well used.
- 8.12 Specific open space requirements (i.e. for outdoor sports etc.) should be based on needs set out within the Playing Pitch Strategy and met within the local area wherever practicable, while more general public open space requirements can be met through a standard per dwelling or hectare requirement, as long as this has flexibility built in depending on the nature of the site.

Q42: Should alternative open space for mitigation be provided as part of new developments or should land be specifically allocated, or a combination?

- 8.13 If the site is of sufficient size with sufficient interconnected habitats, then open space for mitigation can be provided within the site, however if the site is small or otherwise constrained then an off-site solution/mitigation should be considered.
- 8.14 It should be noted that in the case of Bere Hill Farm, initial Ecological Assessments indicate no significant ecological or biodiversity constraints on the site. Furthermore, the site is of a scale and location, with adjoining countryside and areas of open space, that any mitigation can be provided within the site.

Q43: (Heritage) Is there anything additional which the Council should be taking account of?

- 8.15 We have no comments on this question at this stage, but we reserve Peel's right to make comments in the future.

9. INFRASTRUCTURE IN TEST VALLEY (CHAPTER 8)

Q44: How can the Council promote more sustainable forms of transport such as walking, cycling and public transport?

- 9.1 The Council could promote more sustainable forms of transport by encouraging connectivity improvements (to footpaths, cycle links and bus services) within and between development proposals. Indeed, the land at Bere Hill Farm offers potential connectivity between the existing Picket Twenty development to the south east and the Town Centre via Micheldever Road and Old Winton road. An alternative way to find such improvements is through Travel Plan contributions.

Q45: How do you think the Council should be making provision for parking within new development? And...

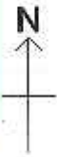
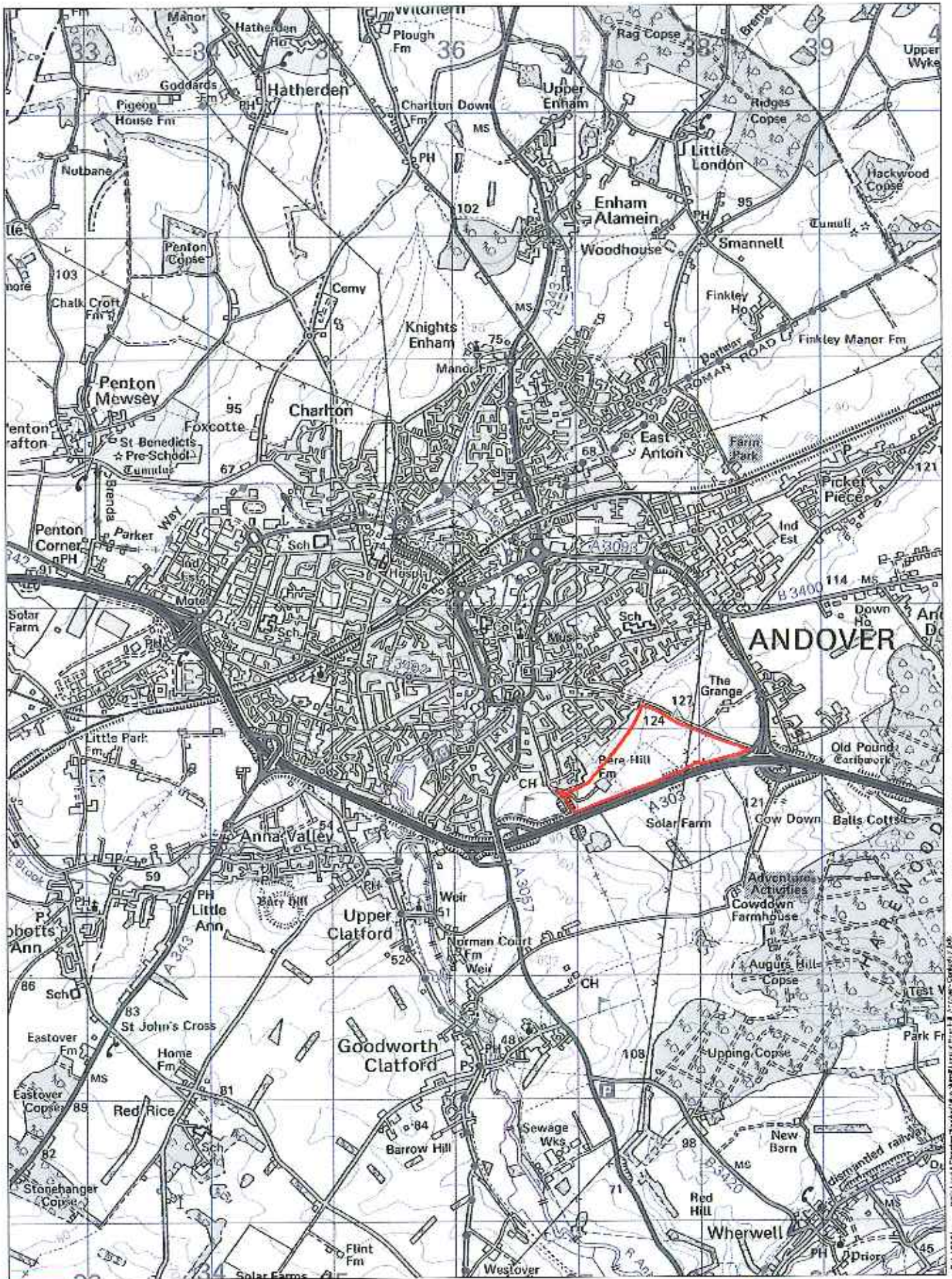
Q46: Do you agree with the Council's current approach or are there changes you would like to see made?

- 9.2 Whilst we raise no specific objections with the current standards, we would highlight that paragraph 105 of the Revised NPPF requires local parking standards to take account of:
- a) the accessibility of the development;*
 - b) the type, mix and use of development;*
 - c) the availability of and opportunities for public transport;*
 - d) local car ownership levels; and*
 - e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.*
- 9.3 Whilst the type and mix of development is taken into account in the current standards, it is unclear whether the other criteria have been considered, particularly the accessibility of the development and availability of public transport, as this clearly has a major bearing on the amount of parking required or that should be encouraged within developments. As such we would ask that clarification on this, and potentially a variation in the standards for each type of development dependant on the sustainability of the location/ settlement.
- 9.4 We would also highlight paragraph 106 of the revised NPPF which confirms that maximum parking standards should only be used where there is clear and compelling justification.

10. CONCLUSIONS

- 10.1 Peel welcomes the opportunity to provide comments to the Council at such an early stage of the process and commend their open and proactive stance on reviewing the Local Plan so quickly.
- 10.2 This representation has demonstrated that the Bere Hill Farm site is an available, suitable and deliverable site which forms an obvious infill opportunity to the south east of Andover, given it is surrounded by existing development and the A303 Andover bypass.
- 10.3 It has also shown how Andover is the primary settlement within Test Valley with capacity for significant further growth, whilst additional economic analysis has shown that jobs growth in Test Valley is exceeding that planned for in the adopted Local Plan.
- 10.4 This suggests that the housing requirement within the emerging plan should be increased to align with this level of jobs growth, which exceeds the standard methodology, which actually leads to reduced need in Test Valley, albeit this is acknowledged to be a starting point.
- 10.5 In terms of the distribution of the emerging housing requirement, it is our view that growth should be focussed on allocations in the existing main settlements such as Andover, as this is clearly the most sustainable location, with a large Town Centre and access to the national rail network. Such growth should be supplemented by community led growth through Neighbourhood Plans to support the vitality of rural services.
- 10.6 Within Andover, the Bere Hill Farm site (and adjacent land) becomes the next obvious choice for allocation, given it scores reasonably well in the sustainability appraisal due to its direct connections with the Town Centre and containment by existing development and the A303.
- 10.7 Whilst there are wider topography issues in this location in the Andover Bowl, these can be overcome through sensitive masterplanning, working with the existing Ladies Walk recreation feature which screens the site from views for the town.
- 10.8 As a final point, it is also pertinent to note that the Council's current evidence contained within the SHELAA dismisses the site on the basis that the currently adopted Local Plan does not allocate the site for development. It therefore dismisses the site as not being in accordance with the Development Plan. No other technical reasons are provided. Given the Council are formally and rightfully reviewing the Local Plan, now represents the correct time in which to reconsider the site's suitability and deliverability for residential development in order to meet the future needs of the Borough and Andover.
- 10.9 In light of the above, this report and representations will be supported by a comprehensive Development Framework in due course, which will provide more detail to demonstrate the site's suitability and deliverability. We therefore respectfully request that the Council considers this site for allocation in the emerging Local Plan and ensure the site is objectively assessed in any future evidence base review accordingly.

APPENDIX 1 – SITE LOCATION PLAN



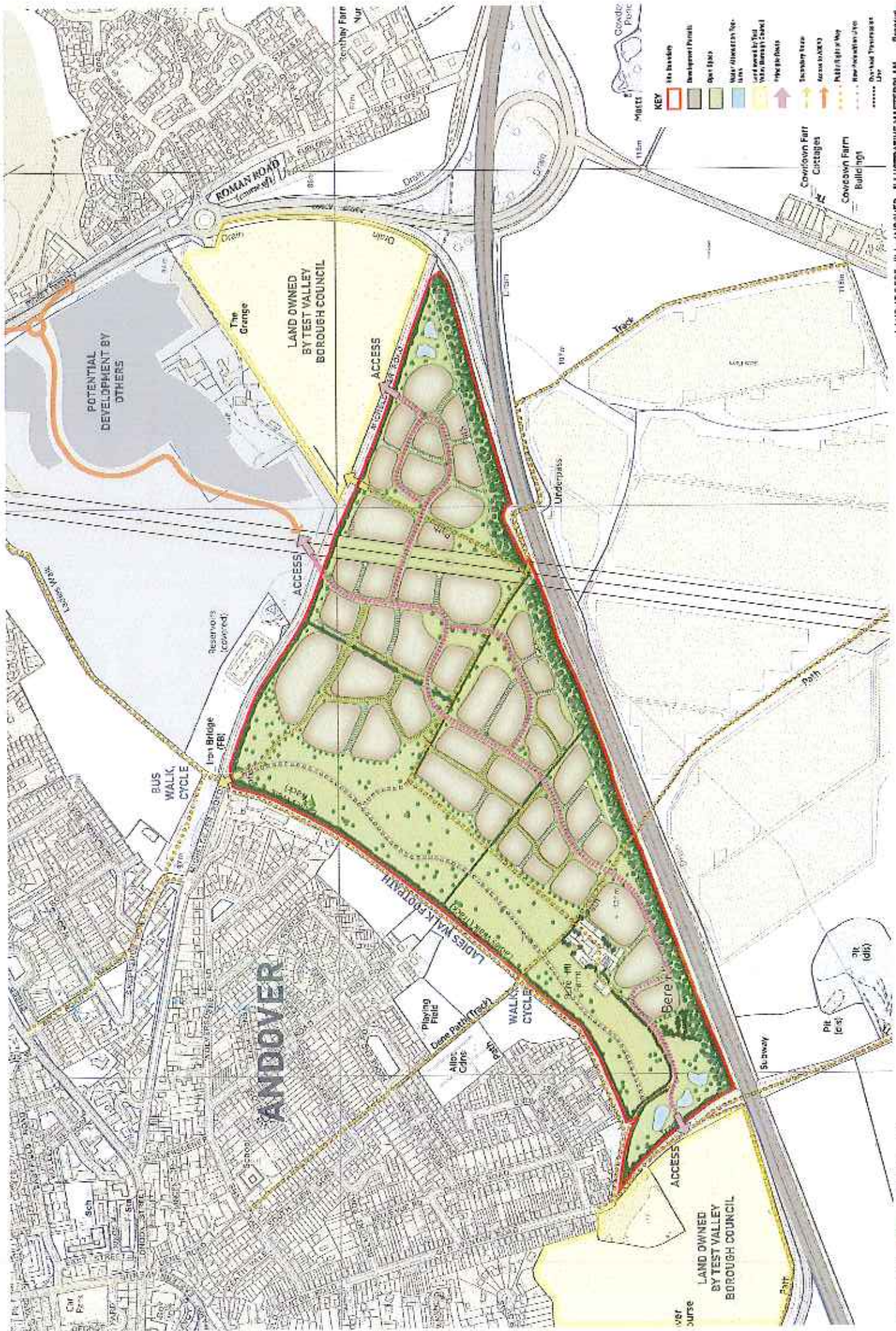
Land at Bere Hill,
Andover



© Crown copyright OS 100018033

Date: 14-09-18 Scale: 1:40000

APPENDIX 2 – LATEST INDICATIVE MASTERPLAN



ANDOVER

