

Test Valley Borough Council - Refined Issues and Options Consultation 2020

Broadlands Estate, Hampshire



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1. Introduction

- 1.1. On behalf of Broadlands Estate ('the Estate'), Savills is responding to the Test Valley Borough Council (TVBC) 'Refined Issues and Options' Consultation for the next Local Plan, published July 2020. This representation responds to the relevant questions raised in the Refined Issues and Options document, with a focus on the Estate's land interests in and around Romsey.
- 1.2. This representation should be read alongside those submitted by the Estate to the Council's last round of consultation in September 2018.

Broadlands Estate

- 1.3. The Broadlands Estate is the landowner of a wide range of properties and land within the town of Romsey and the surrounding area. The Estate is well placed to aid the Council in meeting the housing and employment needs of the Borough and has put forward a number of sites to TVBC through their various call for sites exercises, most recently in October 2019 (see Table 1).

Table 1: Submitted SHELAA Sites (October 2019)

TVBC Ref	Site
150	Romsey Football Ground
151	Lee Manor Farm
152	Nursling Site, Lee Lane
153	Burnt Grove Field
154	Land south of Bypass Rd
155	Land at Burma Road
156	Land at Eastwood Court
157	Eastwood Court Buildings
158	Land at Pauncefoot Farm
160	Broadlands Home Farm
161	Longbridge Farm
162	Skidmore Barns
163	The Old Dairy
-	Bushylease Farm
-	Moorcourt Farm
-	Nightingale Wood
-	Squabb Wood



- 1.4. An Option Agreement between the Estate and Alfred Homes has been signed on Site 154 (Land South of Bypass Road). As such, a separate representation has been prepared and submitted for this particular site by Alfred Homes themselves. Likewise, a stand-alone representation has been prepared and submitted by Crest Nicholson in support of the ongoing strategic promotion of the Estate's land at Grove.
- 1.5. The representations submitted herein relate to the Estate's other land interests in the borough. Given the geographic scope and variance within the Estate's land ownership, the responses offered to the Council's individual questions are made in broad terms and without prejudice to the future development of any of the Estate's land. The SHELAA submission forms for each site are appended for reference.

2. The Refined Issues and Options

- 2.1. The Estate supports the Council in its preparation of the emerging Local Plan. The adoption of the Local Plan in due course will allow for well-planned and proportionate growth in the borough. The Estate's responses to the questions posed within the Refined Issues and Options consultation are set out below.

Q1: Should:

- a) *we maintain the two existing HMAs, but perhaps with a revised boundary between them, such as enlarging the area within STV HMA. If so, what additional area(s) of the Borough should be included within STV HMA? Alternatively;*
- b) *should a single HMA for the whole of Test Valley be used? Or;*
- c) *should additional HMAs be created, increasing the number to 3 or 4, with the additional HMA(s) applying to the rural areas?*

- 2.2. The current Local Plan (adopted January 2016) housing requirement of 588 dwellings per annum, is subdivided between two Housing Market Area (HMAs): Southern Test Valley (STV) and Northern Test Valley (NTV). As detailed in the Issues and Options document, an HMA is, 'a broad geographical area in which generally most people both live and work.'
- 2.3. Test Valley, due to its administrative boundaries, has two clear centres: Andover in the north, and Romsey in the south, and these two locations combined are where approximately 46% of the population of the borough is concentrated. Andover has a high degree of self-containment, and the adopted Local Plan states that 70% of the residents living in the town also work there. Southern Test Valley however, is less self-contained due to its strong relationship with South Hampshire and its good transport links, meaning it experiences much more in- and out-commuting for both employment and other facilities such as leisure and retail.
- 2.4. Given these different geographies, the resulting development pressures on the north and south of the borough are very different. It is recognised that there is pressure in Southern Test Valley to retain the gaps around settlements, such as North Baddesley, which plays an important role in helping to define their character and in shaping the settlement pattern of the area. This is likely to influence the future distribution of development in the south of the borough. Additionally, development in the south of the Borough should focus on links with surrounding settlements, particularly Southampton, and existing movement patterns.
- 2.5. Given the clear and well evidenced division of Test Valley Borough, the north/south split of the borough into two HMAs should be continued in the new Local Plan.
- 2.6. As detailed at Section 5.19 of the I&O Document, the current adopted Local Plan does not make any specific allocations to the rural area of the borough although a figure of 36 dwellings per year is included as part of the requirement for Northern Test Valley. This was to come forward from sources including: infill within settlements, conversions, community led development and rural exception sites.

2.7. NPPF Paragraph 78 states that:

'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'

2.8. In line with paragraph 78, the Estate would support a more varied approach to the delivery of housing within the STV HMA in the next local plan, recognising the not-insignificant contribution that community led and proportionate rural development can make to the Borough's housing needs, when sat alongside strategic scale developments.

Q2: In determining HMAs how should wider relationships with settlements beyond the Borough's boundaries, be taken into account, including with Southampton, Salisbury and Winchester?

2.9. The Local Plan should include evidence of working closely and effectively with adjoining Local Planning Authorities (LPAs) and include strategic cross boundary policies. Specifically, the importance of neighbouring Southampton should be recognised. Figure 11 of the 2018 Issues and Options Consultation showed the commuting relationships with neighbouring authorities. Unlike Winchester, which has a higher proportion of out-commuting, or Wiltshire, which has a higher proportion of in-commuting, Southampton experiences nearly a similar amount of in-commuting and out-commuting from Test Valley, at 4,674 and 4,827 people respectively. This therefore demonstrates a key relationship between Southampton and Test Valley. This is an important consideration and should form part of the Sustainability Appraisal, guiding the new Local Plan.

2.10. The NPPF requires authorities to prepare and maintain one or more Statements of Common Ground. These should be used to document the cross-boundary matters that are being addressed, and how the authorities are co-operating to address these. This should be undertaken throughout the plan-making process and should be a key aspiration for the new Local Plan. Therefore, the plan is not created in an insular manner, but instead develops a sound spatial strategy and objectives, which help to deliver the much needed homes and economic growth within the sub-region.

2.11. The Estate are aware that the Government's current consultation paper 'Changes to the current planning system' proposes a revised Standard Method for calculating Local Housing Need. The revised Standard Method (SM2) shows Test Valley's LHN increasing by 41% from the currently adopted plan levels.

Q4: Should the number steps of the settlement hierarchy be increased, for example by sub-dividing the 'rural villages' into two separate tiers?

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Question 7: How should we treat rural settlements which are close to other larger settlements and can therefore also easily access their facilities and services?

2.12. As set out at Paragraph 5.24 of the Issues and Options Document, the next Local Plan will review the current settlement hierarchy (see Local Plan Policy COM2 and Table 7 of the Adopted Local Plan), together with the approach of defining settlement boundaries. The current settlement hierarchy classifies land/

settlements into four categories:

- Major centres
- Key Service Centres
- Rural Villages
- Countryside

2.13. The Estate supports the retention of 'Rural Villages' as a distinct category within the current Settlement Hierarchy (Table 7: Adopted Local Plan). However, the Estate suggests that there is a gap between the currently defined 'Rural Villages' and the smaller villages simply classed as 'Countryside' that could usefully be filled in the emerging Local Plan. The current Plan fails to recognise the 'satellite' function performed by the smaller rural villages surrounding Romsey town, whereby their respective proximity to Romsey allows the beneficial use of the services, amenities and onward travel opportunities offered by the adjacent larger settlement.

2.14. On first appraisal a 'Satellite Villages' category could include (inter alia):

- Lee
- Ashfield
- Abbotswood
- Embley
- Shootash.
- Woodington

2.15. The Estate are again reminded of NPPF Paragraph 78 which states that, '*housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.*' The proximity of these villages to Romsey makes them suitable locations for proportionate windfall development over and above the scale of development afforded to them as 'Countryside'.

2.16. Given the geography of the Estate, the villages listed above relate solely to Romsey, however, the same exercise could very easily be replicated for those villages performing the same function around Andover.

Q9: How should we define settlement boundaries? What types of land uses should be included, such as public open space?

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Question 11: Should settlement boundaries be draw more tightly or more loosely, and perhaps reflecting which tier settlement is within the settlement hierarchy?

2.17. Parts of Test Valley, particularly in the south of the Borough, contain a number of individual settlements with unique characters. Local gaps have previously been used to protect and enhance these individual characters, and it is therefore felt that they should continue to have a role within the emerging Local Plan.

2.18. The approach of drawing settlement boundaries around the urban edge of a settlement is well established.

Where the growth of a settlement is required and planned for, such as in and around Romsey, the settlement boundary should be adjusted accordingly so that it can accommodate the level of planned growth across the plan period, allowing for windfall sites to come forward. As such, the emerging Local Plan should redefine the settlement boundary of Romsey and its satellite villages, to allow for proportionately sized future housing and employment sites to come forward, either through site allocations or via small windfall sites.

Q13: Should we have a specific policy for self-build homes?

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Q15: Should self-build housing to be delivered as part of community led development?

- 2.19. It is recommended that the Local Plan should reflect a need for custom and self-build plots within the Borough, however it should not specify a percentage that should be achieved on all development sites. This is due to the fact that not all development sites will be suitable for custom or self-build plots, whereas others may come forward to be entirely delivered as custom or self-build properties. Instead, it is suggested that the Local Plan should seek to negotiate the inclusion of custom or self-build plots on a case-by-case basis, taking into account factors such as the proposed development and the site.
- 2.20. Custom and self-build plots should be actively encouraged on rural exception sites, as such sites are typically more readily accessible to those wanting to commission or build their own homes and afford the respective developer more freedoms in respect to building to higher environmental and architectural standards (i.e. under NPPF paragraph 79(e)).

Q17: Should a revised tourism policy be more flexible for potential new tourist attractions?

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Q18: Should a revised tourism policy be more supportive of innovative proposals?

- 2.21. The NPPF promotes the inclusion of tourism policies with Local Plans, particularly in rural areas. Paragraph 83 of the NPPF states that "*planning policies and decisions should enable: c) sustainable rural tourism and leisure developments which respect the character of the countryside*". The Issues and Options paper recognises that the borough is a popular tourist designation and the visitor economy brings many benefits to an area. The Issues and Options paper suggests that a new local plan tourism policy could support proposals to attract guests who stay longer, spend more and thereby protect the viability of the host business as well as the local supply chain. This is supported by the Estate in the strongest possible terms.
- 2.22. To support the continued growth of the tourism sector within the Borough, particularly within rural locations, it is considered that the emerging Local Plan should consider making allocations for tourism uses, alongside smaller scale 'windfall' tourism developments that will help to promote the borough as a destination and support the local economy.
- 2.23. Above all else, the Estate requests that any revised tourism policy is written to allow rural enterprises

sufficient flexibility to change and adapt their business. Rural tourism is increasingly recognised as a successful means of diversifying agricultural and other land-based rural businesses. It would be unfortunate for the wording of the revised policy to unduly restrict and stifle any such innovation and diversification. The Estate would highlight Paragraph 84 of the NPPF in particular, which states:

'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.'

The Rural Economy and Employment

- 2.24. Whilst the Refined Issues and Options Document does not ask any specific questions in regard to the rural economy, it does state at Paragraph 6.21 that: *'The rural economy is a significant component of Test Valley's economic prosperity. Businesses located in the rural area of the Borough provide a significant contribution towards the economic success of Test Valley and the area is home to a large number of companies and jobs.'* This is supported by the Estate in the strongest possible terms.
- 2.25. The allocation of employment land is crucial to the success of the emerging Local Plan, in that it must seek to meet the employment needs of the Borough and also support the level of proposed housing. The NPPF (paragraph 20) sets out the Council's obligation to set out an overall strategy for the pattern, scale and quality of development, including employment space. The provisions of sufficient employment space within the borough helps to minimise the travel distances that residents must travel in order to obtain employment. It also helps to boost the investment potential of the Borough. As such, it is agreed that TVBC should allocate sufficient land for employment use through the emerging Local Plan, to be supported by the evidence base currently being produced.
- 2.26. The number of small businesses operating in the Borough continues to grow significantly. As such, it is considered that the allocation of small employment sites, which are flexible in their use and are capable of meeting the needs of a variety of different businesses through flexible workspaces, is an important topic for the emerging Local Plan, perhaps even more so in the shadow of the COVID-19 pandemic in which access to local and flexible workspaces was shown to be incredibly valuable.
- 2.27. Allied to the above, agriculture and land based industries have a key impact on the character of the areas and how the borough's landscapes are managed. As part of the preparation of the next Local Plan, the Council has stated that it will need to consider the best ways to conserve and where possible enhance the Borough's green infrastructure. As the Council is aware, the Estate owns and manages large tracts of land in the south of the borough and would be delighted to engage with the council at the appropriate time to discuss opportunities to deliver targeted green infrastructure improvements.

3. Recommendations and Conclusions

- 3.1. These representations have been submitted on behalf of Broadlands Estate in response to the Test Valley Borough Council 'Refined Issues and Options' Consultation for the next Local Plan
- 3.2. As detailed in these representations, the Estate is the owner of a wide range of properties and land within and surrounding the town of Romsey. Accordingly, the Estate is well placed to aid the council in meeting the housing, employment and green infrastructure needs of the borough within the Southern HMA.
- 3.3. The Estate supports the Council in its preparation of the emerging Local Plan. The adoption of the Local Plan in due course will allow for well-planned and proportionate growth in the borough. The Estate would offer the following recommendations in respect of the form and content of the emerging Local Plan:
- Given the clear and well evidenced division of Test Valley Borough, the north/south split of the borough into two HMAs should be continued in the new Local Plan.
 - In line with NPPF Paragraph 78, the Estate would support a more varied approach to the delivery of housing within the STV HMA in the next Local Plan, recognising the not-insignificant contribution that community led and proportionate rural development can make to the Borough's housing needs when sat alongside strategic scale developments.
 - The Local Plan should include evidence of working closely and effectively with adjoining local planning authorities and include strategic cross boundary policies.
 - The Estate suggests that there is a gap between the currently defined 'Rural Villages' and the smaller villages, simply classed as 'Countryside' that could usefully be filled in the emerging Local Plan by a 'Satellite Villages' category.
 - The emerging Local Plan should redefine the settlement boundary of Romsey and its satellite villages, to allow for proportionately sized future housing and employment sites to come forward, either through site allocations or via small windfall sites.
 - It is recommended that the Local Plan should reflect a need for custom and self-build plots within the Borough, however it should not specify a percentage that should be achieved on all development sites. Policies should actively encourage custom and self-build plots on rural exception sites.
 - To support the continued growth of the tourism sector within the Borough, particularly within rural locations, it is considered that the emerging Local Plan should consider making allocations for tourism uses alongside smaller scale 'windfall' tourism developments, that will help to promote the borough as a destination and support the local economy. Above all else, the Estate requests that any revised tourism policy is written to allow rural enterprises sufficient flexibility to change and adapt their business.
 - The allocation of employment land is crucial to the success of the emerging Local Plan, in that it must seek to meet the employment needs of the borough and also support the level of proposed housing. The allocation of small employment sites, which are flexible in their use and are capable of meeting the needs of a variety of different businesses through flexible workspaces, is an important topic for the emerging Local Plan.
 - As part of the preparation of the next stage of the Local Plan, the Council will need to consider the best ways to conserve and where possible enhance valued green infrastructure.



- 3.4. The sites submitted to the Council's Call for Sites exercise and appended to these representations are suitable, available and can be achieved within the first five years of the Plan. As such, it is recommended that TVBC considers the allocation of these sites through its site selection processes.
- 3.5. Should the Council wish to obtain any further information on any of the land within the Estate's ownership, or to visit any of the sites included in the appendices, Savills would welcome the opportunity to discuss the matter with officers.

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