

# Test Valley Borough Council Next Local Plan - Refined Issues and Options Consultation

## COMMENTS FORM

Test Valley Borough Council has published for public participation its Refined Issues and Options document. This is the second stage of preparing the next Local Plan, which follows the Issues and Options consultation in 2018.

You can respond to our consultation by filling out the form below. Further information can be found on our website at: [www.testvalley.gov.uk/nextlocalplan](http://www.testvalley.gov.uk/nextlocalplan)

The consultation period runs from Friday 3 July 2020 to 4.30pm on 28 August 2020. Please respond before the close of the consultation period.

Once the form has been completed, please send to

If you are unable to send via email, please send a postal copy to our address below.

### Contacting us

We are happy to help. If you have any queries, please contact us at:  
Planning Policy and Economic Development Service  
Test Valley Borough Council  
Beech Hurst  
Weyhill Road  
Andover  
SP10 3AJ

Tel: 01264 368000

Website: [www.testvalley.gov.uk/nextlocalplan](http://www.testvalley.gov.uk/nextlocalplan)

## Part A: Your Details

Please fill in all boxes marked with an \*

Title*		First Name*	
Surname*			
Organisation* (If responding on behalf of an organisation)			

If you wish your comments to be acknowledged and to be kept informed of progress, please provide your email address below:

Email Address*	
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If you don't have an email address and wish your comments to be acknowledged and to be kept informed of progress, please provide your postal address.

Address*				
			Postcode	

If you are an agent please give the name/company/organisation you are representing:

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### Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment. All representations and related documents will be held by the Council for a period of 6months after the next Local Plan is adopted.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are available on our website

<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

## Part B: Your Comments

Please use the boxes below to state your comments and questions. Please make it clear which paragraph or question your comments relate to where possible.

Paragraph / Question Ref	Comments
	Please see letter enclosed.

*Please use next page if necessary*

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**What happens next?**

All valid responses will be acknowledged and you will be given a reference number. Please quote this number when contacting the Council about the next Local Plan. If you have an agent acting on your behalf, correspondence will be sent to your agent.

All response received will be taken into account as part of the preparation of the next Local Plan.

# LOXTON

## LAND PROMOTION

Planning Policy and Economic Development Service  
Test Valley Borough Council  
Beech Hurst  
Weyhill Road  
Andover  
Hampshire  
SP10 3AJ

27<sup>th</sup> August 2020

Dear Sir / Madam

### **Test Valley Borough Council New Local Plan – Responses to the Refined Issues and Options Consultation**

#### **Introduction**

This letter has been prepared by Loxton Land Ltd on behalf of the owners of Redburn Farm, Ampfield (see location plan in Appendix 1). We are a land promoter and have an interest in the aforementioned land. We wish to promote the land for residential development and, with this in mind, we have provided responses to some of the questions raised in the Refined Issues and Options Consultation that we believe are of particular relevance. Whilst the comments below relate specifically to the subject land, we believe they are of equal relevance to the shape of future planning policy for the wider District.

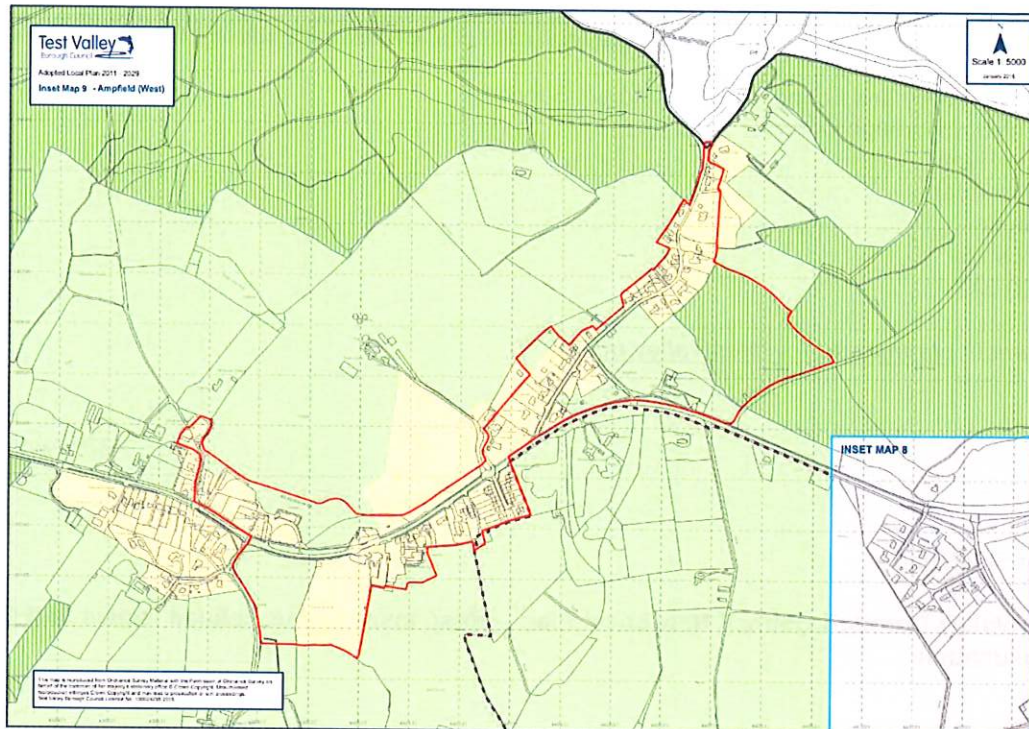
#### **Site information**

The site comprises approximately 9.7 acres of flat agricultural pastureland (shown edged red in Appendix 1) with 37.9 acres or thereabouts of pastureland and woodland beyond it (shown edged blue). The land has road frontage to the A3090 and is currently accessed via Green Pond Lane, which is a adopted highway with footways on each side. The land adjoins the settlement boundary.

Representations have previous been made in relation to the site and it is identified in the 2018 SHEELA under reference SHEELA93. The following comments were made in the assessment:

- The site is located within the countryside on the edge of the village of Ampfield.
- The site lies within the Ampfield – Valley Park Local Gap
- The site lies immediately adjacent to the Ampfield Conservation Area.
- There is a TPO in place along the northern boundary of the site with the A3090
- The site wraps around existing dwellings on Green Pond Lane to the north west
- There are few local amenities within walking distance; however there are bus stops close to the site located on the A3090.
- The entrance of the site leads onto the A3090 allowing easy access to Romsey and Winchester.
- The site is available and promoted for development by the landowner, but to date has had no interest from developers. Development of 70 dwellings (at 20dph) is proposed within 5 years.

## Ampfield Settlement Boundary and Conservation Area Plan



### Responses to the Refined Issues and Options Consultation:

#### Question 3

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 area?

We consider that a more detailed review of the HMA's is worthwhile pursuing with more focus on the rural areas. This could provide for the specific allocation of sites in rural villages in order to deliver sustainable development and, subsequently, betterment for these village. We contend that with large HMA's, focus is targeted solely on large settlements. Division of HMA's at appropriate levels could allow for greater responsibility to be given to a greater number of settlements within the housing market areas ensuring a sustainable spread of development rather than over delivery in one particular area or town.

#### Question 4

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

The Test Valley Revised Local Plan DPD 2011 – 2029 Regulation 22 – Submission to Secretary of State in respect of Policy COM2 noted that;

*"The rural settlements in Test Valley **vary considerably in terms of their overall sustainability**. A number of settlements appear to be centres for a wider rural community and contain a concentration of facilities that are relatively accessible. They therefore present a reasonable option for allowing limited development to meet local needs and to help support existing services and facilities."*

*"Rural villages provide a range of facilities which support the daily needs of residents; **some have a greater range than others** e.g. Longparish and Broughton. Most have limited or no facilities and residents will rely upon neighbouring villages or will travel to the larger towns such as Andover, Stockbridge, Romsey, Winchester and Salisbury. The decline in rural facilities has been taking place for some time with changes in lifestyles and availability of services via the internet having a significant impact. **The issue is how to support the viability of remaining facilities in villages and to promote new facilities and services.**" (emphasis added)*

The existing settlement hierarchy is based on a scoring system, with the most sustainable settlements (Andover and Romsey) scoring a maximum of 11 points and the Key Service Centres (e.g. Stockbridge and North Baddesley) scoring between 6 – 9 (excluding Chilworth).

The Rural Villages are the final tier and their scores vary widely, between 1 and 9 – demonstrating the point made in the quote above about the disparity between rural settlements.

Ampfield is defined as a Rural Village, but scores well with an overall score of 6. This is on a par with Charlton (which is defined as a Key Service Centre).

Ampfield contains a primary school, a nursery school, five bus stops, a village hall, a golf club and clubhouse, a public house, a restaurant, a church. The village is located just 2.3 miles east of Romsey and 5.1 miles north west of Chandlers Ford.

In view of this, we consider Ampfield to be significantly more sustainable than some of its Rural Village counterparts. We do not, therefore, consider it to be appropriate that the same planning policy in respect of housing delivery should apply to Ampfield as it should in, for example, Leckford which contains far fewer services.

In the same vein, a village such as Ampfield which contains the services necessary to sustain a community should be given a greater responsibility to help meet the housing targets of the District in order to relieve housing and infrastructure pressures that are placed on the larger settlements.

This has already been evidenced to some degree by the small developments at Morley Road (39 units) and Broadgate Farm (11 units) which would not be suitable in a location such as Leckford, but help demonstrate the sustainable nature of Ampfield as a settlement. We would support this approach being enshrined in policy to ensure that development in rural areas can be more clearly directed to the most sustainable villages.

Paragraph 5.45 of the current Local Plan notes that;

*"The settlements within the 'Rural Villages' category do not contain the range and number of facilities and services or have the accessibility of the first two categories to support strategic development allocations. However, because of the level of facilities available to help support and sustain communities either individually or shared, some additional development may be appropriate."*

As shown above, the current scoring system means that a settlement such as Ampfield with a score of 6 is classed as Rural Village governed by a different planning policy to that of, say, Charlton which is defined as a Key Service Centre but also has a score of 6.

We would respectfully request that this is taken into account in the future in the forthcoming Local Plan, perhaps through the disaggregation of Rural Villages into 'Large Rural Villages' and 'Small Rural Villages' so that appropriate planning policy can be designed for each.

## Question 5

**How should we decide which settlements to include within each step of the settlement hierarchy?**

We support the assessment of Rural Villages based on a points scoring system that is linked to the number of services and availability of public transport. We would wish to see that this system also takes account of i) proximity to other, larger settlements ii) whether the settlement would become more sustainable if residential development were to take place in the settlement.

This relates directly to the issue of viability of services raised in the quotation above. Ampfield is a reasonably sized village, with a population of 1,583 people according to the 2011 census. We consider that a small number of additional houses in the village would help to sustain its existing services and could prove to be the tipping point which would promote the addition of further services (e.g. a shop or post office).

As such, consideration should be given to the positive impact on the degree of service provision that a development may have and the consequential impact on the Job Ratio score which is used to assess each settlement in the hierarchy.

Ampfield also has a high number of bus stops relative to its size and therefore can be said to be particularly sustainable in public transport terms.

A specific scoring system which relates to the degree of public transport available in each settlement would be welcome and housing development in such areas would help with the retention and promotion of such services, rather than engender their decline through lack of use.

The ability for a site to provide onsite recreational facilities or to promote the use of public access and green infrastructure should also be considered.

The land under the control of the owners at Redburn Farm includes a large area of woodland (to the south), through which public access could be provided for the benefit of those occupying a new development and the existing occupiers of the village. The land is located close to the Ampfield Wood (to the north) which also contains multiple Public Rights of Way.

## Question 6

**Should we consider groups of rural settlements together, where these are closely related to each other and/or share facilities and services?**

We contend that grouping of smaller rural settlements should depend on their degree of annexation and accessibility to larger settlements or whether their combined points score in the Settlement Hierarchy would deliver an overall improvement to the area. If so, these could be perceived as sustainable 'clusters' which may warrant their own site allocations to support and safeguard existing services.

## 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?**

The 'Issues and Options' document suggested a number of options for how housing could be distributed and the strategy of a wider distribution of housing to a larger number of settlements was supported. We also support this approach. Indeed, the proximity of Ampfield to Romsey and Winchester is highlighted in the SHEELA assessment (see above).

The ability for a settlement to access the nearby larger settlements via public transport should be considered. In the case of Ampfield it has numerous bus stops which provide regular access to Romsey and Winchester and such a service provision should weigh in the settlement's favour in respect of its sustainability and, therefore, its ability to deliver sustainable development.

Promoting development in rural settlements which are close to other larger settlements will safeguard the continued provision of this bus service through its continued use.

## Question 8

**In updating the settlement boundaries to reflect recent development which has been built and development with planning permission, should we also include new allocations?**

Yes – in our opinion the revised settlement boundaries could provide a holistic document for the benefit of the LPA, Parish Councils, developers/promoters and the general public. A settlement boundary which shows the above information will provide a useful indication of the direction of the growth for the settlement and may assist in avoiding speculative application in unsustainable areas. Furthermore, it could assist in plan led promotion of sites where there is an identified need for housing to support existing service provisions.

## Question 9

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

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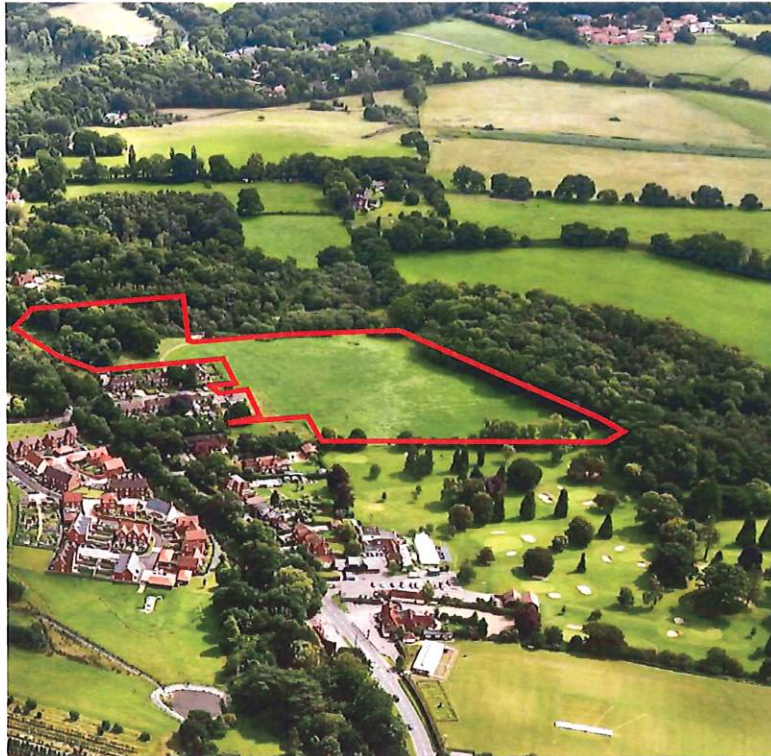
## Question 10

**Should the approach to using whole curtilages for defining settlement boundaries be retained, or should we take account of physical boundaries which extend beyond curtilages, or limit settlement boundaries to only parts of curtilages?**

The current adopted Local Plan does not make any specific allocations to the rural area. We would contend that this does not make sufficient allowance for the delivery of appropriately-sized residential development in the more sustainable Rural Villages and thus is not a holistic approach to housing delivery in the District.

The settlement boundary in Ampfield does not currently take account of physical boundaries beyond the settlement which, by virtue of their existence, would control the extent of any additional development. In relation to the subject land at Redburn Farm, it is clear from the physical boundaries which exist, namely the road and residential development to the north, the golf course to the west and the woodland to the south and east, that the settlement boundary could be extended without the risk of initiating uncontrolled urban sprawl. Indeed, the development of land in the north eastern corner of the site could be considered infill since there are existing residential uses and built form to the east, west and north. In short, the land is well contained. This should be taken into account when considering whether development in this village (as well as other Rural Villages) could be also be well contained and therefore fall within the settlement boundary. This can be seen clearly in the image below (as shown in Ampfield Village Design Statement):

Aerial view of village centre, semi-rural setting and local gap



## Question 11

Should settlement boundaries be drawn more tightly or more loosely, and perhaps reflecting which tier settlement is within the settlement hierarchy?

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## Question 12

Should settlement boundaries provide further opportunities for further limited growth beyond infill and redevelopment?

Settlement boundaries should consider the physical nature and attributes for each settlement. It has already been explored above that some rural villages can score at the same or similar levels as Key Service Centres. With that in mind, it would seem reasonable for settlement boundaries to allow for an element of sustainable growth (beyond that of infill and redevelopment) should there be a) Adequate and appropriate parcels of unconstrained greenfield land b) An existing level of services that could support additional dwellings/population c) a village in a sustainable location which is not isolated from other key service centres.

By way of example, it is considered that Ampfield and the site referred to above could be included within a revised settlement boundary.

## Question 13

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

The UK is considerably behind the rest of Europe with regard to the number of self builds carried out each year. This is further compounded by the lack of diversified building techniques in the UK, which are often referred to as 'non-standard' or 'unconventional' construction methods.

In our opinion it would be an oversight to not include specific policy with regard to self-build. This should be extended over to custom-build. Proper policy which promotes self/custom build could assist in the delivery of housing and help to maintain stable housing growth figures. The introduction of such policy could also aid in the research and development of other construction methods, many of which are much faster and more sustainable than traditional methods, which in turn could speed up the delivery of housing.

## **Question 16**

**Could the introduction of a self-build housing policy also be an opportunity for the Council to tackle the issue of climate change?**

As outlined above, if policy is in place to support self/custom build dwelling this in turn may help deliver sustainable alternative construction methods. We consider this should be explored further by the Council.

We trust the above provides a helpful summary of our opinions and recommendations in relation to the LPA's Plan Review process and we would be pleased to engage with the planning policy officers further as the new Local Plan progresses to discuss the matters raised above both in relation to the land at Ampfield and District as a whole.

## Appendix 1 – Land at Redburn Farm, Ampfield

