

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

28th August 2020

Dear Sirs,

TEST VALLEY BOROUGH COUNCIL: NEXT LOCAL PLAN - REFINED ISSUES AND OPTIONS CONSULTATION

Carter Jonas is instructed by L Marshall & Partners to respond to Test Valley Borough Council's ("the Council") Regulation 18 Local Plan Refined Issues and Options Consultation. L Marshall & Partners is the owner of land north of Sandy Lane, Romsey. A Vision Document for this land is appended to this letter.

We have reviewed the consultation document and have responded to some of the questions raised hereunder. This submission also refers to site-specific matters and should be taken as confirmation that our client's land is available, and that the scheme outlined in the Vision Document is achievable and deliverable.

We note the assessment of the Land north of Sandy Lane as set in the June 2020 version of the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA). The site is given the reference number 187 and is included in a list titled:

"Southern Test Valley Sites identified outside of Local Plan Settlement Boundary where a change in policy is required for development"

The assessment for the site suggests that there could be a capacity for some 333 dwellings and/or 4240 square metres of employment floor space.

In general terms, our client supports the emerging Local Plan and its strategies for growth over the next few years, whether that is up to 2036, or a longer-term vision. We expect that our client will be able to deliver development on this site in the shorter term.

Land North of Sandy Lane, Romsey ("the site").

The site is an unrestored area of gravel working dating back to the Second World War. Which, on the basis of the definition in the National Planning Policy Framework ("the Framework"), makes it previously developed land.

The site is relatively flat with a gentle slope from north to south. There are trees and hedges at the boundaries of the site, especially at the south along Belbins/Sandy Lane. 1.15ha of Belbins West is in use

for storage and distribution, as is 0.2ha in the south-west corner of Belbins East. The land is accessed off Sandy Lane.

The site is largely unconstrained:

- It is not subject to any special landscape or other designations.
- It is located in Flood Zone 1 (land least susceptible to flooding).
- There is existing development ranged along the south side of Belbins/Sandy Lane, which makes development on the north side a logical complement to the existing pattern of development.
- Our preliminary transport highways assessment confirms that there are no insurmountable highway constraints.

Land north of Sandy Lane has the potential to deliver a sustainable extension to Romsey that will complement the growth that is currently being delivered at Abbotswood and Ganger Farm. There is the capacity for at least 300 dwellings. There is also an opportunity to deliver a food store for the northern end of Romsey, which can provide for local growth and ease traffic and parking pressure on the town centre.

Further information on the potential for the site can be seen in the appended Vision Document.

Refined Issues and Options (3 July to 28 August 2020).

Our client notes the key challenges that the Refined Issues and Options seeks to consider, which are:

- 1 *Meeting needs in a way which does not have an adverse effect on environmental assets or high quality of life.*
- 2 *Development in sustainable locations with public transport access.*
- 3 *Development designed to respect the character of the place, minimise carbon emissions and mitigate against climate change.*
- 4 *Mix of new housing should also more greatly reflect local needs.*

Land north of Sandy Lane has the potential to help meet these challenges and can also engage with the aims and aspirations of 'Romsey Future.'

Housing Distribution and Housing Market Areas

The consultation document suggests options for considering housing market areas (HMA) in the Local Plan. We understand the Council's current approach – to identify two HMA – which can be supported on the basis that historically it has been successful. However, national policy guidance and proposed legislative change in the recently published government White Paper all point towards the use of local authority level statistics and measures. The standard methodology for calculating housing need and the housing delivery test are both set at authority level so, for compliance and ease of cross referencing, we would respectfully suggest that, as a first step, housing requirements should be set out in the Plan at an authority level.

Once the authority level requirement is understood, this can be split subsequently to respond to the Council's spatial strategy. A spatial strategy that reflects the most sustainable locations for growth – a settlement hierarchy – is strongly supported by our client and further detail in this regard is given below.

Settlement Hierarchy and Settlement Boundaries

We support the principle of settlement hierarchies, which seek to funnel development to the most sustainable locations. Sustainable locations – and the hierarchy – should be judged on the availability of services and facilities, access to employment and access to sustainable forms of travel. Being able to improve these things or creating sustainable locations should be a consideration. The way that we live our lives is changing, and we are relying more on 'virtual' communications, therefore, a measure of a locations sustainability could also be the ability to access to high-speed internet, something that is often improved with the delivery of new homes.

Our client supports an approach to settlement hierarchies where groups of rural settlements that are closely related to each other, or close to 'higher order' settlements, and share facilities and services are considered to be sustainable locations for growth. However, this should be on the understanding that sustainable transport/communication links (including safe pedestrian and cycle links) between those settlements can be maintained and improved.

We would suggest that this approach is consistent with the Government's Planning Practice Guidance (Paragraph: 009 Reference ID: 67-009-20190722), which states that:

A wide range of settlements can play a role in delivering sustainable development in rural areas, so blanket policies restricting housing development in some types of settlement will need to be supported by robust evidence of their appropriateness.

Turning to settlement boundaries, we have some concerns about a "blanket" approach to managing change in rural areas. Settlement boundaries are an arbitrary and blunt instrument, which do not have regard to the contribution that some open spaces within settlements make to the character and appearance of those settlements.

In terms of impact on amenity and the local landscape, it might be preferable to locate new homes in edge of village locations which technically, might sit outside the arbitrary boundaries. It is therefore suggested that the philosophy and operation of settlement boundaries is also carefully considered during the Council's plan drafting to ensure that they are still generally fit for purpose.

Self-Build and Custom Build Housing

Our client has no significant comment to make regarding this matter, except to say that where needs can be proven there could be capacity for this type of housing delivery on land north of Sandy Lane.

Tourism

Our client has no comment to make regarding this matter.

Other matters

We have read with interest the remaining parts of the Refined Issues and Options Consultation document including:

- Employment
- Environment & quality of life
- Infrastructure and community facilities

The importance of these matters in plan making, and good spatial planning is agreed, and we look forward to engaging in these matters and commenting on them in due course. Land north of Sandy Lane – as explained in the attached vision document – has the potential to support local employment growth whilst also managing environmental impact and helping to realise wider community benefits.

Conclusion

L Marshall & Partners is generally supportive of the Council's emerging Local Plan strategy. We would welcome the opportunity of meeting with officers and elected members to discuss further the contribution that the previously developed land north of Sandy Lane can make to the plan-making process.