



Our ref: 50057/JI/SP

Your ref: Regulation 18 Stage 1

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

By email: [REDACTED]

08 April 2022

Dear Sir / Madam

**REPRESENTATIONS ON BEHALF OF THE ROWLES FAMILY  
TEST VALLEY BOROUGH COUNCIL CONSULTATION FOR LOCAL PLAN 2040 REGULATION 18 STAGE 1**

I write on behalf of our client, the Rowles Family, in response to the Test Valley Borough Council Draft Local Plan 2040 Regulation 18 Stage 1 consultation. This letter follows earlier representations made to the Issues and Options consultation in September 2018 and to the Refined Issues and Options Consultation in August 2020, including promotion of land within our client's ownership: Dunkirt Lane, Abbots Ann.

We understand that the focus of the current stage of the Local Plan 2040 is to set out the vision and objectives for the Borough Council, the spatial strategy, and to consider development needs and certain strategic policy areas, such as housing.

Within the document, the council sets out that the proposed objectives of the Local Plan 2040 include:

- *“Our Communities: Deliver and strengthen sustainable, cohesive and healthy communities in our towns and villages. Secure enhancements to social, green, health, educational and other local infrastructure through new development in sustainable locations. Support the viability of the Borough’s town and local village centres in meeting many of the daily needs of our communities and residents.*
- *Housing: Provide a range of homes that are fit for purpose and designed to meet the needs and aspirations of different groups within the community, including a range of affordable housing and homes that meet the needs of an ageing population.”*

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## Spatial Strategy

In respect of a proposed growth strategy, we note that at the Issues and Options stage, various options were put forward, including community-led distribution, proportionate distribution to parishes, local plan allocations, new village(s), or a mixed approach which could include a combination of the options. The draft Local Plan considers that a 'hybrid approach' of the following three options is the preferred option [REDACTED] development across the Borough,

- Option C – Concentrating development at key economic or employment centres
- Option D – Focusing development in the towns of Andover and Romsey
- Option E – Distributing development in order to support the largest settlements in the Borough (incorporating more urban and rural locations).

The Spatial Strategy Topic Paper expands on the approach: *"This reflects a slightly more dispersed growth approach than is currently the case in the Adopted Local Plan, through focusing growth not only at our largest range of sustainable settlements (both at towns and local service centres), but also at our larger and more sustainable rural settlements. Development at these locations can help to maintain and enhance the sustainability and vitality of the settlements and the range of facilities that they can support."*

## Comment

In principle, a hybrid approach to growth is supported, particularly as this enables proportionate growth within rural communities/villages, which is important to support existing services and facilities and avoid rural communities falling into the 'sustainability trap'. It is also very important so that some affordable housing is delivered in the rural areas.

We note and support that Abbotts Ann has been classified as a 'Tier 3' settlement within the proposed Settlement Hierarchy (Spatial Strategy Policy 1 (SPP1), which is identified to have all six of the 'key' facilities and a good level of public transport and is therefore described as one of the more sustainable rural settlements.

However, when ordering settlements, it is not clear if any consideration has been given to how groups of villages and their shared services function together (NPPF paragraph 79) as opposed to being entirely independent communities, which of course, in reality they are not.

In meeting housing requirement, we [REDACTED] [REDACTED] to modify its strategy and distribute development to a mixture and range of sites, and to provide for a minimum of 10% of the [REDACTED] supply on smaller sites of 1 hectare or less, as required by the NPPF (paragraph 69). As this is a minimum requirement, provision should be made within the council's forthcoming draft planning policies to support further delivery of houses on suitable smaller sites should they come forward during the course of the plan period. A greater supply of smaller sites helps to improve the prospects of delivery over the plan period as they are often less complicated, for example in terms of land ownership, than larger sites.

### **Development Opportunity at Dunkirt Lane, Abbots Ann**

As set out within the Draft Plan, Abbots Ann falls within NTV which, as its own HMA, will be expected to deliver 57% of the total housing requirement of the Borough. It is essential, therefore, that the council allocate sufficient housing sites to meet this local need, particularly in suitably identified 'sustainable' locations.

These representations confirm that our client's land at Dunkirt Lane in Abbots Ann (SHELAA site 190) remains available for consideration.

Whilst the site is currently within the countryside, and therefore the principle of development is not supported, it is well related to the existing settlement. The allocation of this site would be in line with the council's preferred growth strategy, which incorporates distributing development to more rural locations, and particularly as the site adjoins the village of Abbots Ann, which is considered to represent an appropriate and sustainable location for new residential development, including affordable homes, confirmed by the council's identification of it as a Tier 3 "more sustainable rural settlement".

As noted within previous representations, Land off Dunkirt Lane, on the southern edge of the village, is both available and suitable and has a capacity for around 15 to 30 homes making a proportionate, modest but significant contribution to meeting local housing need, including affordable homes. Previous representations which provide further detail, are appended.

As advised by recent Pre-Application discussions with planning officers, development proposals would be informed by a careful appraisal of the character of the area, including heritage designations, the setting of the Conservation Area, landscape and visual impact, and ecology considerations. Similarly, following Pre-Application discussions with Hampshire County Council highways officers, suitable access arrangements are being explored in further detail (existing direct access to the land would need to be modified to support residential development).

We therefore encourage the Council to continue to consider this opportunity to help the ongoing vitality and sustainability of this rural community. and make a modest but significant contribution to the NTV housing supply.

We would be grateful if you could acknowledge receipt of this letter. If you have any other questions or comments please do not hesitate to contact us.

Yours sincerely,

James Iles MRTPI  
Director

Enc. Pro Vision representations made to the Issues and Options consultation in September 2018  
Pro Vision representations made to the Refined Issues and Options Consultation in August 2020