

Our ref: 50839/RO



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

Sent by email to [REDACTED]

8 April 2022

[REDACTED]

REGULATION 18 STAGE 1

I write on behalf of our client, Mr Roger Barons, 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 *Refined Issues and Options Consultation* in August 2020¹, including promotion of land within our client's ownership: Land adjacent to Hyde Farm, Broughton.

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, the spatial strategy, and to consider development needs and certain strategic policy areas, such as housing.

It is noted that with regard to the objective of creating 'communities', the Local Plan 2040 seeks to:

"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."

With regard to housing objectives, the Local Plan 2040 seeks to:

"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."

¹ Ref.10188 (receipt confirmed in email from TVBC dated 27/08/2020)

Spatial Strategy

We note that various options for the strategic growth strategy have been considered², including:

- A. Focused growth strategy through the provision of a new village(s) or settlement(s) in the Borough;
- B. Concentrating development at key sustainable transport hubs along public transport routes and stops in the Borough;
- C. Concentrating development at key economic or employment centres;
- D. Focusing development in the towns of Andover and Romsey;
- E. Distributing development in order to support the largest settlements in the Borough (incorporating more urban and rural locations); and
- F. Dispersal of growth to all parishes

The Local Plan 2040 considers that a ‘hybrid approach’ is the preferred option³ for distributing future development and comprise:

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

The Spatial Strategy Topic Paper expands on the preferred 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, the preferred hybrid approach to growth is supported. This echoes the comments made at the Refined Issues & Options stage (August 2020). As stated previously, this approach 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 agree that Broughton has all six of the ‘key’ facilities and a good level of public transport, and support its description as one of the more sustainable rural settlements. Therefore, the classification of Broughton as a ‘Tier 3’ settlement⁴ is supported.

Further, the range of local services in Broughton could also support services in nearby villages⁵.

² Spatial Strategy Topic Paper (February 2022) – paragraph 4.1

³ Spatial Strategy Topic Paper (February 2022) – paragraph 4.14-4.15

⁴ Spatial Strategy Policy 1 (SSP1): Settlement Hierarchy

⁵ NPPF#79

In meeting housing requirement, we support the council's commitment to modify its strategy and distribute development to a mixture and range of sites, and to provide for a minimum of 10% of the council's total supply on smaller sites of 1 hectare or less, as required by the NPPF⁶.

The need to consider allocating for a higher number of homes (than the residual requirement as a minimum) in order to provide for greater resilience in maintaining a sufficient supply of sites⁷ is supported. The need to ensure sufficient flexibility and resilience to respond to delivery risks⁸ is important, especially in the context of delivering nutrient neutrality across the Borough.

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.

Land adjacent to Hyde Farm, Broughton

[REDACTED] Broughton within the Southern Test Valley (STV) housing market [REDACTED] over 43% of the Borough's total housing requirement. It is [REDACTED] sufficient housing sites to meet this local need, particularly in suitably identified 'sustainable' locations.

These representations confirm that our client's land adjacent to Hyde Farm, Broughton⁹ remains available and deliverable. [REDACTED]

Whilst the site is currently within the countryside, and therefore the principle of market housing development is not currently supported by planning policy, it is nonetheless well related to the existing settlement and its range of facilities and services. The allocation of this site would be consistent with the Council's preferred growth strategy, which promotes the distribution of development to more rural locations, and particularly sustainable locations. This is reinforced by the Council's identification of it as a "more sustainable rural settlement" (Tier 3).

As noted within previous representations, Land adjacent to Hyde Farm has a capacity for around 20-25 homes making a proportionate, modest but significant contribution to meeting local housing need, including affordable homes.

The SHELAA states the site has potential for 45 dwellings. However, development proposals would need to be informed by a careful appraisal of the impact on the adjacent Conservation Area, listed buildings and the wider landscape, and also the Village Design Statement (2004). Hence, the capacity of the site is likely to be less when access arrangements, landscaping and the character and appearance of the setting, are considered.

The site is well connected to the village, with access via Horsebridge Road, and public rights of way providing further direct routes to the centre of the village and associated community facilities. The SHELAA notes that local amenities are within walking distance and that there is a bus stop on Horsebridge Road. This site compares favourably in accessibility terms to other sites identified in the SHELAA.

⁶ NPPF#69

⁷ Housing Topic Paper (February 2022) – paragraph 6.7 [REDACTED]

⁸ Housing Topic Paper (February 2022) – paragraph 6.9 [REDACTED]

⁹ SHELAA ref. 116 [REDACTED]

Broughton is considered to represent an appropriate (and sustainable) location for new residential development. Land off Horsebridge Road is both available and suitable and could make an important contribution to meeting both the Borough's identified housing need and sustaining existing community facilities in the village.

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 housing supply.

[Redacted]

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 Faithfully

[Redacted signature]

Richard Osborn
Associate Director

[Redacted contact information]

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