

Planning Policy and Economic Development Service  
Test Valley Borough Council  
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Your ref:  
Our ref:

By email: [REDACTED]

8<sup>th</sup> April 2021

Dear Sirs,

## TEST VALLEY BOROUGH COUNCIL: DRAFT LOCAL PLAN 2040 REGULATION 18 STAGE 1

Carter Jonas is instructed by L Marshall & Partners to respond to Test Valley Borough Council's ("the Council") Draft Local Plan 2040 Regulation 18 Stage 1 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, which was shared with the Council in 2021 in response to the 'Call for Sites' exercise. We are submitting the Vision Document again now for your ease of reference and to demonstrate the breadth of information that has been collected about the site, and how development of the site can be achieved.

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 continued 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 out in the November 2021 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 Mixed Use Sites identified outside of Local Plan Settlement Boundary where a change in policy is required for development"*

The Council's assessment for the site suggests that there could be a capacity for some 300 dwellings and 4500 square metres of retail floor space. The assessment is generally agreed by our client, and we are pleased to note that it reflects key parts of our previous submissions to the Local Plan consultation process.

In general terms, our client supports the emerging Local Plan and its strategies for growth over the next few years, up to 2040. 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 (PDL). It is noted that only part of the site is listed as PDL in the SHELAA. This assessment is disputed, given the nature of the site and the known extent of the unrestored gravel workings.

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.

## **Draft Local Plan 2040 Consultation Stage 1 (11 February to 8 April 2022)**

Our client notes that there are three key parts to the consultation:

- Chapter 3: Spatial Strategy (including Settlement Hierarchy)
- Chapter 4: Strategic Policy Framework (including five general strategic policies)
- Chapter 5: Meeting Our Needs (including Housing Need and Supply)

Each chapter is considered hereunder but we also note that further detailed policies, and crucially draft development site allocations, are due to be presented in the stage 2 Regulation 18 consultation later this year. The next stage of consultation is eagerly awaited.

### **Chapter 3: Spatial Strategy**

Our client welcomes the Council's decision to adopt a varied approach to housing distribution, placing growth at the principal settlements of Andover and Romsey at its heart.

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. The opportunities for improving these services and facilities should also be part of the Council's assessment criteria. The way that we live our lives is changing; we are relying more on 'virtual' communications, therefore, a measure of a location's sustainability could also be the ability to access high-speed internet, something that is often improved with the delivery of new homes.

Romsey is clearly a sustainable location for growth and on this basis, Land north of Sandy Lane is a prime candidate location for new development. As recorded above, the site has received a favourable assessment through the SHELAA and as our Vision Document demonstrates, it can be delivered in a timely fashion.

## **Chapter 4: Strategic Policy Framework**

### *Strategic Policy 1: Countering Climate Change*

The currently drafted policy is framed at a high level, with the aim of delivering net-zero development. Greater detail is to come in the next consultation. We look forward to reviewing this additional assessment work and will respond as necessary.

We note however, that the national approach to making homes more energy efficient will allow for the transition to zero carbon homes by improving energy efficiency and decarbonising the national grid. The proposed regulations will ensure that there is sufficient time for the development industry, and relevant supply chains, to deliver the Future Homes Standard from 2025. The Council should recognise that this is not just an issue of viability but also one of deliverability, and that the interim Part L of the Building Regulations is an important stage to implementing the higher standards from 2025.

At Land north of Sandy Lane, we are in the process of developing a vision for the site that will enable the delivery of energy efficient development, that is seeking net zero carbon. The basis for our efficient development aspirations is included in the attached Vision Document and will be expanded upon as we add detail to the overall masterplan. We will be able to develop the masterplan alongside the emerging Local Plan to ensure that all policies – including those aimed at adapting to a changing climate – are complied with and exceed where possible.

The draft policy expectation for development to meet 10% Biodiversity Net Gain is also noted. This is something which is now part of primary legislation (through the Environment Act 2021), but the consequences of this expectation should also be carefully considered by the Council. The need for a net gain in biodiversity can affect the viability of development and can also reduce the development capacity of sites. These matters will need to be balanced in the allocating of development sites in the next iteration of the Local Plan and potentially the number of sites, when considering how best to meet the Council's housing needs.

The Council will be able to note from the Vision Document for Land north of Sandy Lane, that our emerging masterplan allows for the provision of significant landscaping and open space, as well as private gardens with new homes. All of these elements will deliver at least a 10% net gain in biodiversity.

### *Strategic Policy 2: Delivering Healthy, Well-Designed Development*

At this stage, this reads as a very high-level general design policy. We have no comments on this iteration of the design policy and await the more detailed and specific considerations to come in the next consultation.

### *Strategic Policy 3: Delivering Development and Regeneration*

This policy defines the relevant town centres, and we have no specific comments to make except to support the Council's aspirations for the continued vitality of these centres. This aspiration should not, however, come at the cost of providing new facilities with new development so that all parts of the community can access facilities and services across urban areas such as Romsey.

### *Strategic Policy 4: Delivering High Quality Development in Town Centres*

This policy defines development in town centres (e.g., design etc.), and we have no specific comments to make.

### *Strategic Policy 5: Delivering Infrastructure*

The general guidance on infrastructure set out in this policy is understood, and the principle that its delivery supports sustainable communities and is necessary for good planning is agreed. We await with interest the more detailed and specific considerations to come in the next consultation. We note also that development at Land north of Sandy Lane can be delivered with limited stress on existing infrastructure and has the potential to reduce impacts on the wider infrastructure network of Romsey.

## Chapter 5: Meeting Our Needs

Over the proposed plan period 2020 to 2040, and following the standard methodology, at least 10,820 homes are needed in Test Valley (or 541 dwellings per annum). We note that this figure will need to be updated as the plan is developed to reflect the likely submission date of the Local Plan and the most up to date evidence regarding affordability.

In addition, we are concerned that insufficient consideration has been given to the potential for unmet housing needs from neighbouring areas. Despite comments in the Local Plan that there is “*no evidence*” of unmet housing needs from neighbouring authorities, a report – regarding the emerging Statement of Common Ground (SoCG) between the constituent authorities - considered by the Partnership for South Hampshire (PfSH) in October 2021 noted that housing supply between 2021 and 2036 would fall short of meeting identified needs by nearly 13,000 homes. This report noted that the current shortfall in Southampton is over 7,000 homes and over 5,000 homes for New Forest District Council. Notwithstanding that the New Forest has recently adopted a new Local Plan and Southampton’s Plan is in its infancy, unmet needs remain a significant risk, and these are two authorities amongst many in the PfSH where unmet needs may emerge.

The Council will need to consider how it could deliver more homes to meet some of the needs arising in these adjacent areas. Further work on this matter, through the Duty to Cooperate, and specifically the finalised PfSH SoCG, are awaited with keen interest.

Moreover, the need for homes for all parts of the community, including affordable homes, and homes for the elderly etc. will need to be carefully considered before a figure for the Local Plan *requirement* can be alighted upon.

Turning to the spatial distribution of development, the Council is proposing to split delivery of its requirement between the north and the south of the Borough based on relative levels of population growth. Whilst this appears to be a reasonable **starting point** for a spatial distribution, levels of available land must also be borne in mind. The Council also needs to retain some flexibility to ensure needs are met in total in the borough.

Finally, the Council makes some comments about the potential supply of new homes (and sites). There is an understandable lack of detail on this matter, given that draft allocations are proposed for the next iteration of the Local Plan. We will comment when appropriate on the allocations. However, at this juncture we would again make the point that the Land north of Sandy Lane, Romsey should be recognised as being suitable and deliverable for development in the early part of the plan period. There are also some matters of principle in the current consultation that warrant comment:

- (a) The Council is considering allocating sufficient land to provide some ‘head room’ above the housing requirement; we fully support this plan making option and suggest that it is very sensible best practice. We work in a number of authority areas where this approach has been found sound at Local Plan examination. A buffer should be included in the Plan to allow for unforeseen delays in delivery – especially of larger sites – but also to provide some resilience when the time comes to review the Plan.
- (b) The Council should seek to allocate a diverse ‘portfolio’ of housing sites, including a range of locations and sizes. This will allow smaller sites to deliver early in the Plan period and provide the opportunity for larger sites to come through the system as the period progresses. The location of sites should represent both a sustainable pattern of growth and also support the range of communities in the borough, both urban, and rural.

**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.

We await with keen interest the next stage of the Local Plan 2040, which will include draft site allocations and suggest that Land north of Sandy Lane should be included in that Plan. The site has the potential to help meet the challenges of housing need; it can also engage with the aims and aspirations of the Local Plan and specifically 'Romsey Future.'

Yours faithfully,



**Steven Sensecall**  
Partner

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