

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

Our ref: 10713

BY EMAIL: [REDACTED]

07 April 2022

Dear Sir/ Madam

Test Valley Local Plan – Regulation 18 (Stage One) Consultation

We write on behalf of Mr and Mrs A. Boyle, of [REDACTED] and make the following representations on the Regulation 18 (Stage One) Local Plan consultation and associated evidence base reports.

Vision

The emphasis upon the need to provide homes which meet a range of needs and aspirations is welcomed. In planning to meet future housing needs, it is important that residents of smaller settlements are able to meet their limited needs for growth/change and as such, the Local Plan should plan not just for large strategic allocations in the most sustainable settlements, but also for some limited development in villages which perform suitably, in terms of sustainability of location.

Paragraph 79 of the National Planning Policy Framework (NPPF) requires that:

“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.”

This is discussed further below.

Objectives

As above, the draft objectives are considered broadly appropriate. In regard to housing, they identify the fact that a range of homes are required, to meet the needs and aspirations of different groups within the community. Our client also welcomes the recognition of the importance of meeting the needs of an ageing population as part of this. This emphasises the need to allow some limited development in smaller rural settlements (alongside large town centres), to enable residents to stay within communities where they may have lived for many years, rather than having to move to Andover or Romsey to access appropriate housing in their later years.



Spatial Strategy

The strategy states that Andover and Romsey will be “a key focus for sustainable growth” which is considered to be an appropriate strategy. However, some recognition of the need to support smaller rural/semi-rural settlements in providing for their needs (so they can “grow and thrive” as required by the NPPF) should be included.

The draft spatial strategy does include the statement that “Development [will be] supported elsewhere in the borough to support the role of smaller rural settlements.” The wording here could perhaps be clearer. Is this statement intended to allow some limited growth in villages in appropriate locations, to enable them to thrive and meet the future needs of their occupants? The phrase “elsewhere in the borough” could be tightened up – would this development be inside the small rural settlements themselves, or nearby?

The reference, in the draft strategy, to “inclusive growth” is welcomed. It is important that those living in villages rather than town can access housing (including affordable housing and housing for the older population) to meet their needs in their own communities and settlements. As such, the Local Plan should allow for some limited growth and infill development in smaller rural settlements on appropriate sites which are considered “sustainable locations”. In addition, rural settlements should provide some limited options for first homes and self/custom build plots rather than these all being focused in town centres. Local Authorities must plan for housing for different groups including, inter alia, older people and those wishing to commission and build their own homes (para 62 NPPF 2021).

The NPPF (para 69) also highlights the importance of small and medium sites in meeting housing requirements, given that they are often built out more quickly than a large strategic allocation. The NPPF requires that at least 10% of the Test Valley housing requirement be met on sites no larger than one hectare, unless there are strong reasons why this cannot be achieved. We welcome the fact this has been recognised explicitly in the Housing Topic Paper. We expect at the next stage of the Local Plan consultation that further details will be available as to the proposed allocation of smaller sites to meet this requirement. Our client owns land which is located centrally within Upper Timsbury which is at present outside of the Settlement Boundary and whilst not in the SHELAA could form the basis of one such smaller site allocation. Further details of the site are provided below.

Settlement Hierarchy Report

At Issues and Options stage, the Council asked whether groups of rural settlements should be considered together, where they can easily access and share facilities. This is an approach which is recognised in paragraph 79 of the NPPF (which requires that the Local Plan identifies opportunities for villages - like Upper Timsbury and Michelmersh - to grow and thrive). Paragraph 79 expressly recognises that in rural areas, groups or clusters of smaller settlements will play a role in sharing facilities and services. It does not appear that this approach has been consistently followed in the Settlement Hierarchy report as the assessment focuses on arbitrary parish boundaries.

The Settlement Hierarchy report proposes that the parish of Michelmersh & Timsbury be categorised as a ‘Tier 4’ settlement. Tier 3 settlements feature all 6 of the ‘key facilities’ and score high/ medium for public transport provision. By contrast, those in Tier 4, either scored 6 for key facilities but had low public transport provision, or scored less than 5 for facilities (and high/ medium for public transport).

In the case of the parish of Michelmersh and Upper Timsbury, the report finds that it has 4 key facilities (pub, outdoor sports facility, community hall and place of worship) but is lacking a shop and a primary



school. The assessment fails to recognise the availability of fresh milk from the vending machine at the community hall, nor the fact that there is a local shop in the nearby parish of Braishfield. In terms of schools, there are two primaries nearby in Braishfield and Awbridge. Therefore, the assessment appears to focus on facilities being located within the arbitrary parish boundary rather than considering actual distance to facilities. In addition, the focus on frequency of public transport services (daily bus etc) fails to recognise the other sustainable modes of transport such as cycling and walking.

In view of the foregoing, classification in Tier 4 does not appear appropriate, given close proximity to key facilities and services, and the fact that the village is less than a 4.95km cycle to Romsey Railway Station and a 3.7km cycle to Dunbridge Railway Station.

In a recent appeal decision in respect of Oak Tree Farm, Staff Road, Michelmersh (APP/C1760/W/20/3247857 – Decision Date 15 March 2021) the Planning Inspectorate considered the suitability of Michelmersh as a location for proposed development, particularly regarding the appeal site's accessibility to necessary services and the proposals' effect on the vitality of the village. The Inspector recognised the various services and facilities which were accessible via walking and cycling, as follows:

15. Given the rural location of the proposed development, it is inevitable there would be a reliance on private car use to access services such as healthcare. However, the associated transport impacts would be low given the proposal is for two houses only. The proposed development sits on the edge of the village within a short, mainly level, walking and cycling distance to a school, pub, church and other community facilities, including a part-time village shop. The town of Romsey is around 15 minutes away by cycle, via various accessible routes. Romsey's railway station also offers rail connections to other main towns. Although my time in the locality was limited, I saw many walkers and cyclists making use of the rural road and public rights of way (PROW) networks and I have no reason to consider the routes to be unsafe if users take due care and attention.
16. I also accept that there is a limited timetabled bus service serving the village. However, I understand the village is served by community transport facilities, which I have no reason to consider future residents of the proposal would not be eligible to use.

Therefore, it is not considered appropriate that Michelmersh and Upper Timsbury be classified as a Tier 4 settlement. Rather, Tier 3 seems more appropriate given the range of key services and facilities which are accessible via sustainable modes of transport, and the fact that Romsey railway station is an easily cyclable distance away.

Settlement Boundaries

We note that the previous Issues and Options consultation stage considered the approach towards defining Settlement Boundaries. It was noted there that settlement boundaries currently follow physical boundaries. Questions asked included:

- Whether in updating settlement boundaries, sites with planning permission and allocated sites should be included (Q 8);
- How settlement boundaries should be defined (eg what land uses should be included) (Q9);
- Should whole curtilages be used, or could a settlement boundary run through part of a residential curtilage? (Q10)
- Should boundaries be drawn more tightly or loosely, based up which Tier of the Settlement Hierarchy the settlement is located in? (Q11)



- Should boundaries provide opportunities for limited growth, over and above infill/redevelopment (Q12)?

Our client owns a parcel of land in the centre of the settlement of Upper Timsbury which is presently located outside the Settlement Boundary, presumably for reasons associated with its historical agricultural use. Figure 1 below shows the current Settlement Boundary, with the site marked with a red arrow.

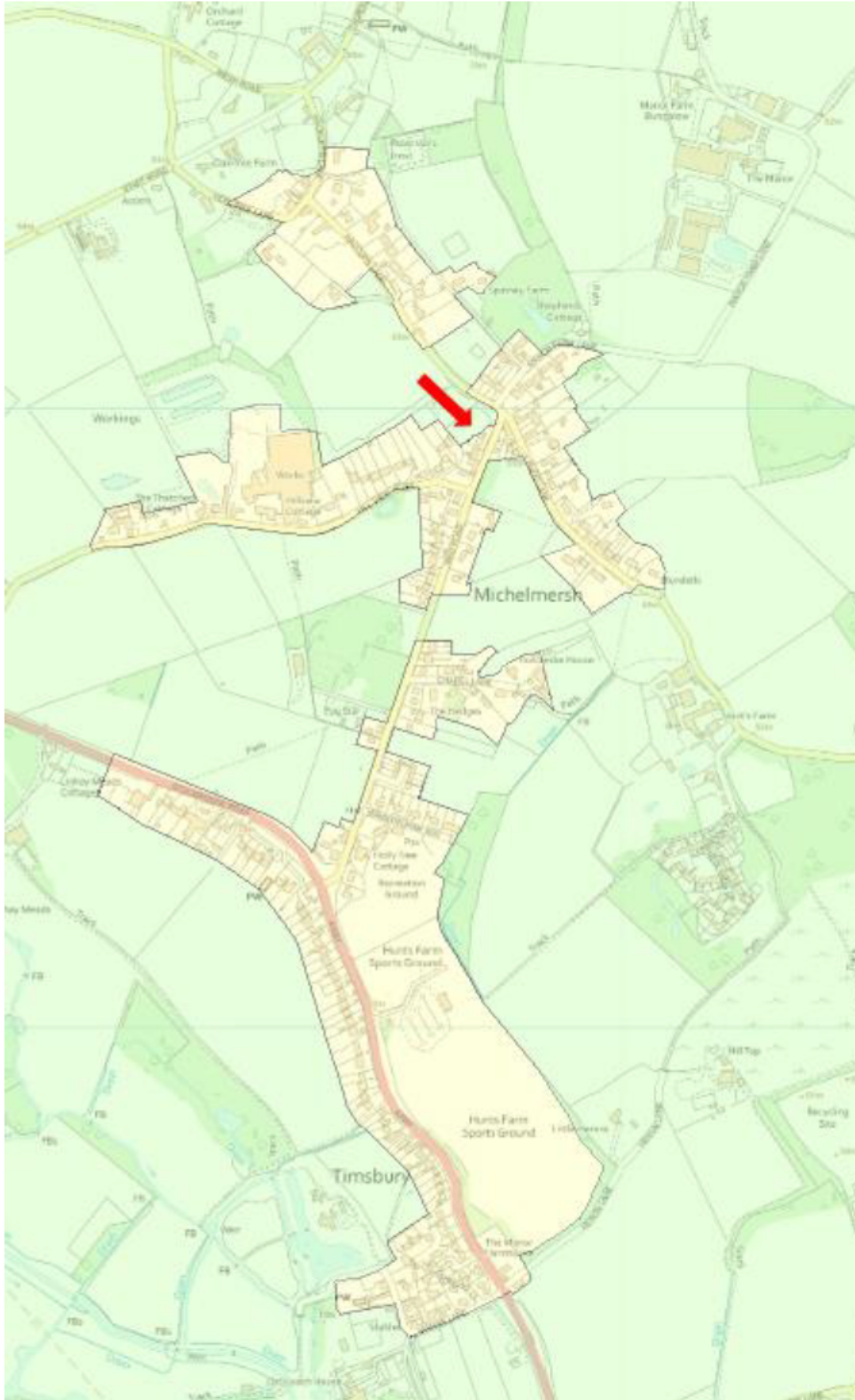


Figure 1 Current Settlement Boundary of Michelmersh and Upper Timsbury



Whilst our client has no intention at present of proposing or carrying out any development on that land, it is appropriate that the land identified in Figure 1 be brought within the Settlement Boundary. The land could play a role in future in meeting the settlement's needs, for example, by providing some limited infill development, or other type of development such as renewable energy generation to assist with mitigation of the impact of climate change and locally generated energy supply.

Historically, the land was in agricultural use as part of a much larger parcel called The Gore. However, the land became separated from the Gore in 1988, when it was acquired by the owners of the Old Rectory, and the adjoining parcel became incorporated into the garden of Nurse's Cottage. The land has not therefore been in agricultural use since 1988, and is more properly regarded as residential amenity space in separate land ownership, linked to nearby residential dwellings.

The land is located centrally within the village with residential development on at least three sides, and road frontage on two sides (Rudd Land and New Road). Since it is cut off from the wider agricultural land, it does not serve any functional purpose as 'countryside' and more approximately classified as being part of the settlement.

A view from the land, looking south is provided in Figure 2 below.



Figure 2 View south from land at junction of Haccups Lane/Rudd Lane and New Road (Upper Timsbury)

Conclusion

Our client broadly supports the vision and objectives as stated in the Local Plan Regulation 18 (Stage One) consultation. However, in addition to focusing development in Andover and Romsey town centres,



the Council must also plan for the need for smaller settlements to grow and thrive as required by Paragraph 79 of the NPPF.

The Settlement Hierarchy report proposed that the parish of Michelmersh & Timsbury be categorised as a 'Tier 4' settlement. This is not considered appropriate as it focuses on facilities within the arbitrary parish boundaries rather than considering actual access to facilities across administrative boundaries.

In the case of Michelmersh and Upper Timsbury, the assessment fails to recognise that residents have access to facilities in nearby Braishfield and Awbridge (including 2 x primary schools) and a fresh milk vending machine in the village itself. In a recent appeal decision, the Planning Inspectorate considered the location to be acceptable (in terms of sustainability) giving due weight to walking and cycling infrastructure and distances. The Settlement Hierarchy assessment considers only *public transport* frequency and not *other modes* of sustainable transport such as cycling and walking. The village is less than 5km cycle from two railway stations. Whilst we recognise not all residents will be able to walk/cycle this distance, this should not preclude a recognition that some residents will be happy to do so.

Finally, we wish to make representations in respect of the Settlement Boundary of Michelmersh and Upper Timsbury. It is proposed that the parcel of land on the junction of Haccups Lane/Rudd Lane and New Road be included within a revised boundary. Whilst our client has no plans at present to undertake any development on that land, it would seem appropriate that the boundary be redrawn given the fact that it is not in agricultural use and has no connection with the wider countryside (given the adjacent parcel is part of a residential garden).

Yours faithfully,

Brigid Taylor

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Associate