

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

8th April 2022
Our Ref: 21014
Your Ref:

by email only

Dear Sir / Madam

REPRESENTATIONS TO THE TEST VALLEY DRAFT LOCAL PLAN 2040 REGULATION 18 – STAGE 1 CONSULTATION:

The purpose of this letter is to provide representations on behalf of our client, Belfield Homes (Ampfield) Ltd, to the Test Valley Draft Local Plan 2040 Regulation 18 – Stage 1 consultation document and associated evidence.

These representations propose a change to the methodology used in arriving at the Settlement Hierarchy and also in the categorisation as Ampfield as a Tier 4 settlement. In this regard The inclusion of Land at Redburn Farm as a strategic housing allocation is proposed within the forthcoming Local Plan. The site location is shown in Figure 1.

Objection: Spatial Strategy Policy 1 (SSP1): Settlement Hierarchy

The Council's general approach towards focusing housing and other growth to sustainable locations is supported. The Council's decision to progress a hybrid of the three spatial options put forward in the previous Issues and Options Consultation is welcomed, with particular regard to focusing development where it would allow rural villages to grow and thrive, in accordance with Paragraph 79 of the NPPF, which states,

'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. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'

Notwithstanding the above we object to the Council's categorisation of key services and facilities and the resultant effect this has on differentiating the rural settlements between Tier 3 and 4 of the proposed Settlement Hierarchy. The proposed key facilities used to assess the sustainability of settlements should be expanded to include 'parks and other public open space'. The importance to social well-being of providing convenient

access to outdoor recreational space is stated in the NPPF, both as part of the three overarching sustainability objectives and in Paragraph 98, which states,

'Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change.'

We object to the Council's assessment of Ampfield and its categorisation as a Tier 4 settlement in the proposed Settlement Hierarchy. Within Table 5 of the Settlement Hierarchy Assessment Topic Paper, Ampfield is considered to provide 5 key facilities (we propose this is increased to 6 with regard to the above), 3 other facilities and a good level of public transport. Taking into account its proximity to Romsey and resultant reduced public transport journey times (and therefore attractiveness) Ampfield would be more appropriately categorised as a Tier 3 Settlement. In these regards Ampfield can be distinguished from most other Tier 4 settlements and would perform better than some Tier 3 settlements such as West Tytherley, Longparish and Abbots Ann.

Vision and Rationale for the Development at Redburn Farm, Ampfield

The Land at Redburn Farm could deliver approximately 80 dwellings within the first 5 years of the Plan period. The site provides a logical urban extension in a sustainable location.

There are no significant constraints to development on this site as set out below. With careful masterplanning the development would include a sensitive layout in closest proximity to existing residents, woodland buffer strip and pedestrian / cycle connections to provide direct access to the primary school and bus services. New amenity open space and SUDS could be delivered to achieve biodiversity net gain and nitrate off-setting.

Site and Surroundings:

The site extends to c.3.5 ha and currently comprises agricultural land located to the south of Winchester Road (A3090) on the eastern edge of Ampfield. There is a small sewerage treatment works adjacent and to the east of the site and two tracks running through the site, connecting with Green Pond Lane. Neither of these tracks are defined as Public Rights of Way (PROW) on the Hampshire County Council (HCC) PROW map. There is existing vehicular access from Green Pond Lane and Winchester Road.

The site is enclosed to the north by a line of mature trees along Winchester Road. The site is already afforded a good degree of enclosure; to the east and south by mature woodland; to the west by Ampfield Golf Course; and by residential curtilages in the north-west corner, comprising two-storey semi-detached dwellings on Green Pond Lane. There is also a dense tree belt on its northern boundary which screens the majority of the site from the public highway. Whilst the site is located on the western edge of the Ampfield / Chandlers Ford Local Gap it does not contribute to the function of the Local Gap due to its enclosed nature and in comparison with the wider countryside.

Further north of the site, beyond Winchester Road, is the junction with Knapp Lane and Ampfield Church of England Primary School. There is a bus stop close to the north west-corner of the site and the Morelys Green development which is served by a Blue Star bus route to retail, employment, leisure, higher education and regional rail connections in Romsey and Winchester town centres.

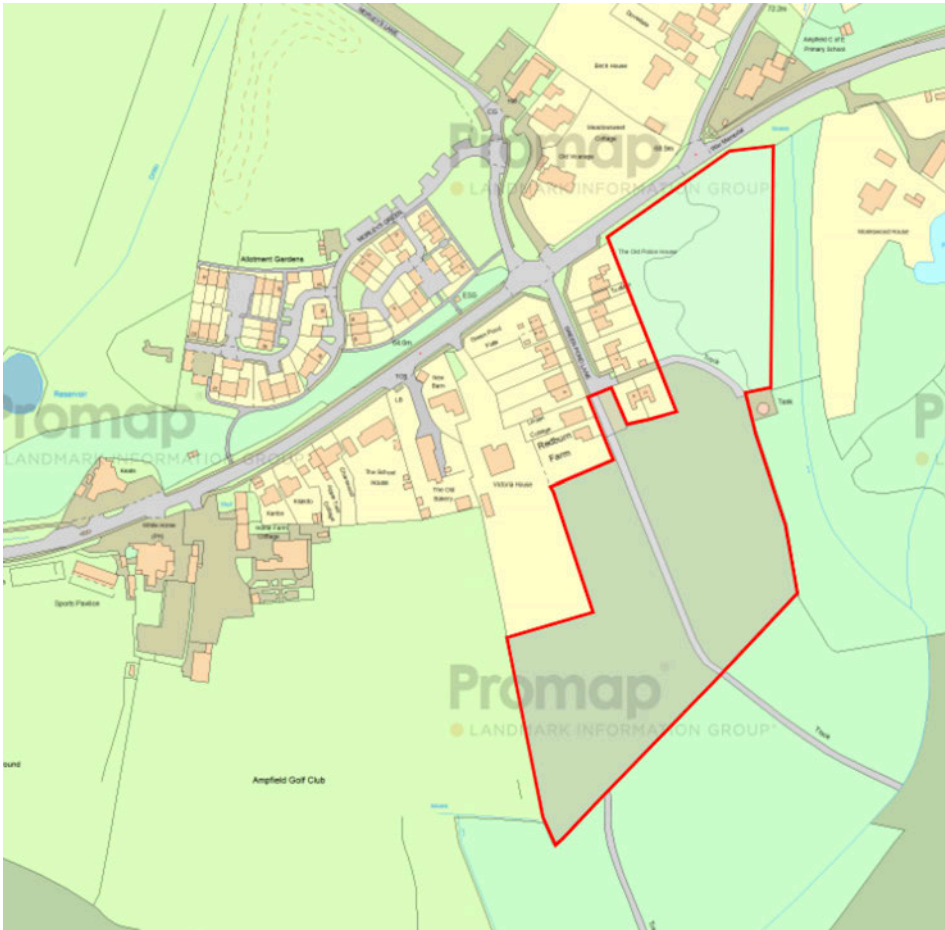


Figure 1: Site Location

The site is not within an area designated for high or medium flood risk, landscape sensitivity or historic significance and does not include heritage assets within its boundary. It is also not within, or adjacent to, a site of international, national or local ecological importance.

There are no known abnormal ground conditions or legal restrictions that would reduce the viability for the site.

Sustainability Appraisal

A sustainability appraisal has been undertaken for the site utilising the objectives of the Test Valley Draft Local Plan Sustainability Appraisal and the associated scoring system shown below. It is noted these symbols are intended to provide a broad indication of performance and should be considered in conjunction with more detailed assessment where required. It is clear from the table below that the site represents a sustainable location for development within Ampfield, in particular owing to its limited environmental constraints, well

contained location, potential for biodiversity net gain and proximity to serves and facilities (including a good level of public transport¹).

Key to Appraisal

Strongly positive	++
Positive	+
Mixed performance	+/-
Negative	-
Strongly negative	--
Depends on implementation	i
Uncertain	?
No effect	o

Sustainability Objective	Performance	Commentary
1. Ensure everyone has the opportunity to live in an appropriate home that meets their needs.	++	The proposed development site could accommodate approximately 80 new residential dwellings of a range of sizes, types and tenures to cater for a variety of people's needs, including a provision of affordable housing.
2. Ensure the local economy is thriving with high and stable levels of growth, whilst supporting productivity and the promotion of a diverse economy, with the availability of a skilled workforce.	+	The proposed development site would contribute to the local economy both through the construction of the development, and post-construction. The proposed development would result in the creation of jobs and wages during the construction phase and will contribute to the overall longer term prosperity of the area through additional expenditure of future residents and additional skills brought to the local workforce in perpetuity. The development would make an important contribution to longer term sustainability of Ampfield as a settlement by providing additional residents to support local services.
3. Maintain and improve access to services, facilities and other infrastructure, whilst improving the efficiency and integration of transport networks and the availability and utilisation of sustainable modes of travel.	+	The proposed indicative development is considered to be a suitable size giving consideration to Ampfield's Tier 4 score in the SSP1: Settlement Hierarchy, which considers such settlements as having limited facilities, but still benefiting from public transport services. Within the site priority will be given to pedestrians and cyclists over private cars to encourage a modal shift. The site sits in close proximity to the school, village hall, local pub and frequent bus services between Romsey and Winchester.
4. Encourage the efficient use of land and conserve soil resources.	++	The site is designated as Grade 4, as indicated within the Natural England South East Agricultural Land Classification Map, and as such the site is poor quality agricultural land and is well suited for residential development by removing pressure from higher grade sites elsewhere in the District.
5. Conserve and, where possible, enhance the water environment and ensure the sustainable	+	The site will incorporate a Sustainable Urban Drainage System that will improve water quality of run off from the site. Any forthcoming proposals will incorporate nitrate mitigation to ensure water quality impacts in the Solent are mitigated. Any forthcoming proposals for residential

¹ ref. Footnote 16 to Paragraph 3.32 of the Draft Local Plan 2040

management of water resources.		development will be built in line with best practice guidance to conserve water use.
6. Seek to avoid and reduce vulnerability to the risk of flooding and the resulting detrimental effects to the public, economy and environment.	+	The site will incorporate a Sustainable Urban Drainage System that will minimise run-off rates at the site to greenfield rates, as well as ensuring that the proposals do not increase flood risk elsewhere. The site is located within Flood Zone 1 and is therefore well suited for residential development in flood risk terms.
7. Maintain and, where possible, enhance air quality.	○	The proposed residential development is unlikely to lead to any impacts or changes to air quality.
8. Conserve and, where possible, enhance the Borough's landscape, townscape and settlement character.	+/-	The proposed development will inevitably lead to some landscape impacts; however, the site is well contained from external views which will minimise impacts with site boundaries that are defined by dense, mature hedgerows. The site sits to the south of residential development, including Green Pond Lane, and makes a logical spatial expansion to the village.
9. Conserve and, where possible, enhance the historic environment and the significance of heritage assets.	○	The proposed residential development site is located close to a number of listed buildings, however, it is considered that the site is situated in a position as not to impact upon them.
10. Conserve and, where possible, enhance biodiversity and habitat connectivity.	++	The proposed development concept will incorporate green infrastructure to maintain and enhance biodiversity and habitats at the site.
11. Support the delivery of climate change mitigation and adaption measures.	+	The proposed residential development will incorporate best practice measures in line with relevant guidance to mitigate climate change impacts.
12. Seek to maintain and improve the health and wellbeing of the population.	++	The proposed development is within walking and cycling distance of key facilities including the school, village green and bus stop to encourage healthy lifestyles.

For the reasons set out above the proposed site allocation on the Land at Redburn Farm is considered to represent a 'suitable' location for housing and logical area for growth for Ampfield

Summary

The Council's approach to the Settlement Hierarchy requires further review, to account for both the importance of public open spaces to sustainable communities and to include Ampfield as a Tier 3 settlement. Ampfield is considered to be a sustainable location for growth, which has been recognised by the Council in the approval

of the Morleys Green development, when taking into account its range of services and facilities, proximity to Romsey and performance against some of the Tier 3 settlements.

The proposal for a Strategic Allocation on the Land at Reburn Farm is considered to be consistent with the aims of the NPPF and National Planning Practice Guidance relating to the 'suitability' of land for housing. The points below summarise how the site responds to the guidance:

- There are no known physical limitations or problems of access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination on the site.
- A development comprising a mix of market and affordable dwellings in this location would provide a valuable contribution towards meeting local housing requirements and would maintain and enhance the sustainability of Ampfield.
- The allocation would be well contained in the wider landscape due to existing mature vegetation which can be strengthened to deliver both biodiversity net gain and ensure the integrity of the Local Gap is maintained.
- Impacts on the amenity of local residents would not be significant, subject to development coming forwards in accordance with the wider policies of the emerging Plan and the NPPF.
- It is clear from the assessment of the site utilizing the objectives within the Test Valley Draft Local Plan Sustainability Appraisal that it provides a well-placed sustainable location

We appreciate the opportunity to comment on the 'Issues and Options' and respectfully request the Council support this proposed allocation and alteration to the settlement boundary in order to help accommodate the Borough's housing need over the Plan period.

Yours sincerely

[Redacted signature]

Ian Johnson MRTPI
Managing Director
Luken Beck mdp Ltd

Email: [Redacted email address]

cc. Mr B Taylor, Belfield Homes