

LOCAL PLAN REGULATION 18 CONSULTATION RESPONSE

MEETING IDENTIFIED BOROUGH NEED AT NORTH BADDESLEY

EXL PROJECT MANAGEMENT LTD | Registered Company No. 12436975 | Registered in England and Wales at

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INTRODUCTION

- This document is a response to Test Valley Borough Council's 1.1 Regulation 18 (Stage 1) Local Plan Consultation. It provides commentary on the draft Strategic Vision, Spatial Strategy and Strategic Policies set out with the Regulation 18 (Stage 1) Draft Local Plan 2040.
- 1.2 This consultation response is submitted on behalf of **Draper Tools Ltd.** As set out in subsequent sections, Draper Tools Ltd are a significant employer and landowner within Test Valley South.
- 1.3 The remainder of this document is structured to ensure consideration of the key topics and to provide context and background to the representations made herein. The following is a precis of the content of each section.

Section 2 - Draper Tools Ltd and Land Holdings

Provides information and background relating to Draper Tools Ltd including their land ownership within Test Valley. It sets out their position within the community of North Baddesley.

Section 3 - Commentary on Regulation 18 (Stage 1) Draft Local Plan

Key commentary on draft strategic vision, spatial assessment and strategic policies as set out within the Draft Local Plan.

Section 4 - Draper Tools & Opportunities to meet Identified Needs

Specific analysis of some significant opportunities and ways in which strategic priorities and policies within the Draft Local Plan could be fulfilled.

It is requested that the land submitted as part of this consultation 1.4 response is also included within the Council's SHELAA submission. This land has not previously been submitted through Call for Sites processes. Draper Tools Ltd wish to make clear that the land identified within this submission is suitable, available, and achievable for development in accordance with Section 4 of this consultation response.



2. DRAPER TOOLS & LAND HOLDINGS

Background

- 2.1 Draper Tools Ltd are a national supplier of tools and machinery. Established in 1919, Draper Tools Ltd are a well-known brand throughout the UK, having supplied tools to the industry and retailers for over 100 years.
- 2.2 Since 1963 Draper Tools Headquarters have been located in Chandlers Ford, Eastleigh. This distribution and manufacturing centre was supplemented in 2007 by the addition of new-build warehouse units at Test Valley Business Park in North Baddesley, which had been owned by Draper Tools since 1997.
- 2.3 Building on Draper Tools' growing success, Test Valley Business Park has undergone phased expansion to meet their needs through implementation of Outline Planning Consent TVS.02389/49. This consent along with subsequent reserved matters approvals provides for the phased expansion of the business park.
- 2.4 Permitted expansion of Test Valley Business Park is well advanced with "Building 6" currently under construction. The site is also home to two other businesses who lease Office and Warehouse units from Draper Tools Ltd.

Current Position

- 2.5 During 2022 Draper Tools Ltd will undertake the relocation of its Headquarters from the current site in Chandlers Ford, Eastleigh, to Test Valley Business Park. From January 2023 the Business Park will serve as Draper Tools' national headquarters and flagship facility. Relocation will contribute greatly to Draper Tools' well-established position in North Baddesley and Test Valley South as a major employer and significant contributor to the local economy.
- 2.6 Test Valley Business Park continues to represent an attractive location to Draper Tools and the other businesses which currently occupy premises there for a number of reasons, principally:
 - Accessibility Including links to the M27 and M3
 - Proximity to facilities and services at North Baddesley
 - Scope for expansion which can be achieved readily with no adverse impacts on surrounding areas
 - Separation from residential areas, avoiding conflicts between residential amenity and commercial uses established on the site
- 2.7 By comparison, the existing headquarters in Eastleigh have been increasingly hampered by new residential development around the site boundaries over several decades. Although the use of the Draper Tools site has not changed since its initial establishment in 1963, subsequent residential development in very close proximity has artificially limited all potential for future expansion and results in competing interests between existing commercial uses and newly-created residential amenity.



Future Needs

- 2.8 By January 2023 Test Valley Business Park will be Draper Tools' National Headquarters, comprising:
 - 8.75 HA Land Area
 - 20,500m² of Class B8 Warehouse
 - 1,260m² of Class E Office Space
 - Circa 200 staff and employees

Moreover, as demonstrated by the Reserved Matters consent for the site, there is capacity for the following <u>additional</u> development with no increase to the current allocation:

- 13,800m² of Class B8 Warehouse
- 2,500m² of Class E Office Space
- Parking to accommodate all of the above
- 2.9 In addition to the above uses within Test Valley Business Park,
 Draper Tools Ltd own and manage approximately 50 hectares of
 land around North Baddesley including a mix of arable, grazing
 and woodland areas.
- 2.10 Draper Tools' land ownership is shown at **Appendix A**.

- 2.11 All of the foregoing accommodates <u>existing</u> demand and allows consolidation of Draper Tools operations into a single premises. Although the extant planning consents provide some flexibility for future expansion this is limited. As has been identified earlier in the document, room to grow is critical to the attractiveness of any employment site; this is especially true of Test Valley Business Park and the three business currently based there.
- 2.12 Draper Tools plan for continuous, sustainable, growth over the foreseeable future. In addition to supporting economic growth within the wider area this will see increased demands for employment and space to support business activities.
- 2.13 It is vitally important that relevant future plans particularly policy, spatial plans and any allocations take an appropriately long-term view and safeguard the ability to accommodate planned expansion and natural growth over the plan period.



Approach

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- 2.14 It has been established that Draper Tools are a key stakeholder and influencer in Test Valley South, in their position as:
 - Economic contributor
 - Local employer
 - Commercial landlord
 - Landowner
- 2.15 Equally important is Draper Tools' proactive and responsible approach to all aspects of the business an approach which is already apparent at Test Valley Business Park. The sustainable and ethically responsible approach includes:

Building For The Future

The new warehouse under construction at Test Valley Business Park has been built from the ground-up with the aim of coping with a changing climate and working towards a carbon neutral, net zero future, including:

- Extensive use of SUDS to manage rainwater run-off as well as improve Biodiversity
- LED lighting throughout
- Best-Practice approach to insulation, heat demand and thermal comfort modelling
- Investigating the use of PV to power the site using clean electricity
- Targeted, well-planned maintenance aimed at improving performance of systems, reducing waste and maximising recycling
- Electric Vehicle charging provision

Reducing Waste

Draper Tools are committed to reducing, reusing and recycling waste in accordance with Best Practice. This includes:

- Certified ISO:14001 Environmental Management Standards since 2001
- Meeting requirements to minimise disposal of Waste Electrical and Electronic Equipment, ensuring high levels of collection for environmentally sound treatment
- Reducing packaging and single-use plastics in operations
- Actively seeking plastic-free alternatives and encouraging their uptake throughout the supply chain
- Segregating waste streams and ensuring treatment according to the best practice hierarchy
- Refurbishment and repair of own tools to maximise longevity and reduce disposal

Caring about Colleagues and Supply Chain Ethics

Draper Tools manifest a deep commitment to their staff and supply chain with appropriate safeguards in place throughout:

- Draper Tools aim to audit every factory they work with to ensure that all supply chain partners meet social, moral, ethical and safety standards
- Enduring concern for the health and wellbeing of each and every colleague in the business beyond simply ensuring fair pay and working conditions
- Initiatives include Mental Health First-Aiders to look after colleagues
- Extensive engagement with community programmes and charity initiatives



3. COMMENTARY ON REG 18 (PART 1) DRAFT LOCAL PLAN

- 3.1 This section considers the content of the draft Local Plan 2040 and provides commentary to support the next stage of production. For ease of reference commentary is set out under the draft Local Plan section headings.
- 3.2 For the avoidance of doubt the commentary is restricted to matters which either impact, or have the potential to impact, upon the land holdings of Draper Tools Ltd. Silence on other matters is not intended to indicate agreement or otherwise.

VISION, KEY CHALLENGES & OBJECTIVES

- 3.3 The overarching vision is considered appropriate to the role of the Local Plan and the headline objectives of the housing and economic policies commensurate with the broad thrust of national planning policy.
- 3.4 The Housing headline is broadly appropriate if a little generic and limited. It would benefit from recognising the role housing plays both in delivering other aims of the local plan (for example supporting employment development and inward investment) and the spatial role that the Borough plays in supporting the delivery of housing to accommodate the required growth within the wider region. This would better reflect the relationships the Local Plan identifies with the Partnership for Urban South Hampshire (PUSH) and the M3 Local Enterprise Partnership (M3 LEP) and the objectives of those organisations.
- 3.5 The same applies to the Economy, Employment & Skills heading. However, here the approach differs from the Housing headline

insofar that no headline link is drawn between the vision & objectives and the strategic policy. It is positive that the relevant objective recognises the importance of Economy, Employment and Skills as a topic. The objective is to

"Promote a vibrant and resilient local economy, including the visitor economy, where future sustainable growth and innovation in green, high technology and other sectors can provide for a range of job opportunities and where businesses and individuals can thrive. Support a skilled and diverse workforce so that local people can access learning opportunities and jobs and benefit from greater prosperity."

However, there is no corresponding Strategic Policy. There is a missing link between the vision and the product - employment floorspace - that <u>delivers</u> the vision.

- 3.6 This is a key weakness of the Draft Local Plan 2040 and is inconsistent with approach taken throughout the rest of the document which consistently links Vision & Objectives with Strategic Policies designed to address them. Whilst inclusion of this topic as a priority for the Local Plan is welcomed and supported, it cannot truly be considered a priority if it is treated differently and with less policy weight.
- 3.7 The lack of a meaningful Strategic Policy for Economy, Employment and Skills should be rectified with a recognition that sustainable growth can only be principally achieved through the intensification of existing employment sites, planned expansion of existing employment sites or through the identification and delivery of new floorspace.

- 3.8 Underpinning the vision should also be a recognition, for both Housing and Economy, Employment & Skills, that the Borough is not an isolated region but rather plays a key role in meeting the needs of a much wider area. Wording should therefore be included to reflect the pivotal role that Test Valley South particularly Romsey and the South-East sub-area plays in meeting wider needs. Whilst this pivotal role is initially posited as a golden thread throughout the Local Plan, it is rarely followed through to delivery despite being a key driver behind the Borough's prosperity and identity.
 - Identify the provision of employment floorspace as a key objective
 - Support existing businesses through resilience and planned growth
 - Housing as the driver for wider policy aspirations
 - Recognise the role of the Borough within the wider region, particularly PUSH

SPATIAL STRATEGY

- 3.9 Whilst the proposed Spatial Strategy of the Local Plan broadly delivers the vision, the current approach is too simplistic in its response to a highly nuanced situation. In particular, it is notable that the spatial strategy selects the simplest conclusions of the Housing Topic Paper and Spatial Strategy Topic Paper but fails to appropriately make provision for the more accurately conclusions that can be drawn from both papers.
- 3.10 A clear example is the reliance on dividing the Borough into two neat spatial elements, North and South Test Valley, and broadly treating their needs equally whereas, in fact, the Papers providing the evidence base all recognise that the South of the Borough has a significantly different context. This is principally due to its proximity to regional economic hubs (Southampton, Portsmouth, Bournemouth & Winchester), proximity to a conglomerate of populous areas (the PUSH region) and strategic regional transport infrastructure (M27, M3, two international ports and rail links).
- 3.11 This initial reluctance to recognise the different contexts is then compounded by not acknowledging the sub-regions present within the Southern Test Valley area. Both the Housing Topic Paper and the Spatial Strategy Topic Paper, in particular, recognise that the South of the Borough is split into at least two further areas identifying Romsey and the South-East sub area as having a distinct spatial context from other parts of Test Valley South.
- 3.12 Further empirical example is found in the broad conclusions of the Settlement Hierarchy Assessment Paper which, with the exception of Andover, sees the majority of top-ranking settlements based in the South of the Borough.

- 3.13 The Paper, which ranks Andover, Romsey and North Baddesley as having the most facilities, should therefore be given greater weight in the spatial strategy as an indicator of where resilience and growth should be targeted. It should be noted, however, that the Paper does not give appropriate weight to proximity to key strategic infrastructure, travel times, nor the potential for sustainable growth which, if re-run, would serve again to highlight the strength of the South of the Borough and, in particular, settlements such as North Baddesley which are well located to receive growth.
- 3.14 The spatial strategy also makes no account for the ability of each settlement to accommodate expansion. Whilst this is likely planned for Stage 2 of the Regulation 18 consultation it is indivisible from proper consideration of the strategy at this stage. For instance, the ability for Romsey town to accommodate significant additional housing or commercial growth is questioned. Therefore, whilst this may be attractive in basic hierarchy terms it is not a realistic prospect, and the majority of growth should be focussed on the next best options.
- 3.15 An appropriate mechanism therefore would be to recognise the differences and, as a minimum, split the Southern Test Valley area into two, thereafter applying weight to those settlements ranked highly by the Settlement Hierarchy Assessment but with greater weight given to those with proximity to strategic infrastructure, particularly transport. The Local Plan should subsequently carry forward such a mechanic into policy-making, ensuring that the resilience of existing facilities and services, and the allocation of growth, are all aligned with the spatial and infrastructure context present.



- 3.16 This would allow for a more accurate assessment of the significant influence exerted by Eastleigh, Chandlers Ford and Southampton all of which contain major residential and commercial centres with a direct bearing on those parts of Test Valley South that are closely related to them. Already, this part of Test Valley South has seen significant demand for growth which is more directly related to overflow from those regions than general grown specifically within Test Valley.
- 3.17 Draper Tools' relocation of headquarters from Chandlers Ford to Test Valley Business Park cited in Section 2 is a prime example of this effect in action. Residential and commercial expansion in Chandlers Ford, Eastleigh and Southampton are such that those regions once highly sought after for employment sites and business premises are no longer appropriate and existing business are relocate to the wider region whilst remaining within 2 or three miles of their original base.
- 3.18 This is an existing pressure discussed in the PUSH Economic, Employment and Commercial Needs (including logistics) Study 2021 and which the Local Plan 2040 must account for. More, though, it is a key opportunity for Test Valley to welcome business and the employment, revenue generation, rates and growth that they represent reaping the benefits accordingly.
- 3.19 The approach suggested in paragraph 3.13 would also align with the responses to the Issues & Options consultation review 2020 which supported growth at the larger urban and rural communities but also, importantly, provide an opportunity for strategic growth to be allocated where existing settlements are sustainably located and have capacity to accommodate growth. This would ensure that the Borough does not stagnate through over-reliance on Andover

and Romsey; it would also acknowledge the clear conclusion of the PUSH study that the "silo" thinking of previous Local plans is now outdated given the growth of the PUSH regions and the emphasis on sustainability.

- Recognise Southern Test Valley as a strategic growth area linked to PUSH and the duty to cooperate
- Give greater weight to proximity to strategic infrastructure
- Reject an equal distribution in favour of recognising the capacity of existing settlements to accommodate growth



STRATEGIC POLICY FRAMEWORK

- 3.20 The Strategic Policy Framework section endeavours to follow through the Vision & Objectives and the Spatial Strategy with each topic intended to carry through the relevant stages to a Strategic Policy. Overall, this approach is supported but reinforcement and greater consistency is needed.
- 3.21 Current draft strategic policies fall short of carrying through causal links and providing a clear pathway to implementable policies. The section is compromised by its mixed approach of focusing on combining strategic topics (such as infrastructure and climate change) and what are perceived as the two key places (Andover and Romsey). Unfortunately, this results in neither working as articulately as they could.
- 3.22 The weight given to Andover and Romsey is premature ahead of consideration of both housing and employment needs, or any consideration of the SHELAA/ allocations process that naturally comes later in the Local Plan process. This section should therefore be repurposed to solely deal with matters which are key golden threads that permeate all policies and decisions.
- 3.23 Crucially, the Strategic Policies are completely silent on the subject of Economy, Employment and Skills. This is a major omission which must be rectified.

- Repurpose section to better reflect golden threads permeating all decisions
- Include a Strategic Policy supporting Economy, Employment and Skills objectives
- Remove detailed consideration of Andover and Romsey until later stages of Local Plan when spatial matters are established and the SHELAA is considered



MEETING OUR NEEDS - HOUSING

- 3.24 This section broadly carries forward the recommendations of the Housing Topic Paper and provides the foundations upon which the spatial strategy can be implemented. It is, however, pertinent to consider some of the underlying assumptions behind the housing target before considering spatial distribution.
- 3.25 Whilst the proposal to utilise existing housing supply to off-set future need has some merit it requires additional scrutiny to ensure that it does not inappropriately skew the distribution of the delivery of housing to meet the future need. For example, there is no consideration of whether the already delivered/ consented 'future need' delivers the wider aims of the emerging Local Plan. For example, of the 4,300 dwellings delivered over the last five years, only 1,300 were affordable. This equates to 30% which is below the current Affordable Housing SPD 2020 which requires 40% on sites over 15 dwellings.
- 3.26 In addition, the Housing Topic Paper refers to working collaboratively with other Authorities within the PUSH region but, given the ability of the Borough to accommodate growth compared to other spatial constriction of other LPA's (particularly Southampton) there is little evidence of such an approach being carried through. For example, the South-East of the Borough, where North Baddesley is located, is part of a Strategic Housing Market Area (SHMA) with Southampton but there is no recognition of such in the proposed distribution of Housing in the Local Plan.
- 3.27 Both of these factors indicate that the Local Plan should accommodate a higher housing need than that being proposed to not only fulfil the Borough's duty to cooperate but to also ensure resilience of delivery and that the wider aims of the Local Plan can

- also be met. The need for resilience, including of delivery in any given five-year period to prevent speculative development, is also underlined by the emergence of Natural England requirements within the region that have stymied delivery (and again underpin the need for a regional approach to delivery & the duty to cooperate).
- 3.28 Moving to the proposed spatial distribution of delivery, the advocated 57% North Borough and 43% Southern Borough severs the causal links that were established in the Housing and Spatial Strategy Topic Papers in favour of too simplistic a spatial distribution. Even if such as approach were to be carried forward the use of the A30 as a dividing line between North and South is too convenient a measure to be empirically supportable and the Housing Market Areas Study 2022 suggests as such.
- 3.29 It is therefore considered that not only should the housing distribution be linked more tightly to the SHMA areas but there should also be greater consideration of proximity to strategic infrastructure (particularly travel) and capacity to accommodate growth.
- 3.30 This would accordingly manifest itself in not only a re-balancing of the spatial distribution in the Borough to accommodate more of the housing need of the Borough in the South but also a further division of the spatial distribution so that the Borough is split into three with a "Romsey and South-East" area identified (as the Housing Topic Paper proposes as an option). The identification of a distinct Romsey and South-East area, which the SHMA 2022 recognises disproportionately accounts for 37% of the Borough's Affordable Housing need, would also allow the Borough to meet its



- duty to cooperate by supporting the growth within the SHMA that covers both that area and part of Southampton.
- 3.31 Once the housing need has broadly been apportioned throughout the Borough the Settlement Hierarchy Assessment should be utilised to indicate those settlements with the greatest capacity to accommodate incremental growth. This would result in those settlements that are ranked highly, such as North Baddesley, that have good access to regional centres and high-quality transport infrastructure accommodating the Borough's growth. Such as approach would be empirically supported and have clear causal links between regional and Borough wide needs and appropriate delivery.

- Better analyse consented/delivered 'future need' to ensure balance of remaining need is appropriately distributed and includes a buffer so wider Local Plan aims are delivered
- Accommodate regional need supporting PUSH region and recognising shared SHMA with Southampton
- Distribute housing need with consideration of proximity to key infrastructure, particularly travel, and capacity to accommodate housing
- Split the Borough into three recognising the Romsey & South-East area
- Utilise the Settlement Hierarchy Assessment, but adjusted to incorporate transport infrastructure, to direct growth

MEETING OUR NEEDS - ECONOMY

- 3.32 This is where the draft Local Plan 2040 is weakest. As has been set out, there is no Strategic Priority in place to support economic growth or the development of employment and skills. This omission is at contrast with the Objective which sets this topic as a Borough priority, and with the overwhelming evidence of demand set out in background papers.
- 3.33 The Local Plan appropriately recognises that the recent economic performance within the Borough is an indicator of confidence in the Borough and a direct reflection of its excellent strategic location and compelling transport links. Availability of high-quality, high-frequency transport links throughout Test Valley area arguably make it one of, if not, the best in the PUSH regions.
- 3.34 The Local Plan rightly reflects the conclusions of the PUSH Economic, Employment and Commercial Needs (including logistics) Study 2021 that Test Valley is attractive to businesses in the PUSH Functional Economic Market Area (FEMA) (as defined by the 2019 Solent Economic Profile Report by Lichfields for the LEP). The report goes on to firm up this view with empirical evidence that not only does Test Valley have the most industrial space of all PUSH Authorities (1,220,000sqm in 2018) but that approximately 16,000 people commute into Southern Test Valley Mid-Layer Super Output Area (Census 2011).
- 3.35 This context underpins the conclusions of the report which are worth repeating here to underline their significance:

"for industrial users there is evidence of long-term undersupply with low vacancy rates and limited property" (para 5.69)

"more land is justified to address this bottleneck" (para 5.72)

and that it is "good practice to provide for more land than is needed" (para 6.18).

- 3.36 Again, there is therefore compelling justification to accommodate further employment floorspace within the Borough and key to this is the Borough's role within the wider region. This is not universal, however. The South of the Borough commands a key strategic location within the PUSH region and, as such, is well placed not only to accommodate growth within the Borough but also growth within the region recognising the duty to cooperate and an opportunity to capitalise on the multiple benefits that are derived from hosting economic growth. This would also correct the imbalance created by the existing local plan which, for example, has seen the majority of the strategic warehouses within the Borough being located in the North (the balance of 137,000sqm since 2016).
- 3.37 It is therefore considered that the proposed spatial distribution of employment land should be further distilled into an additional area - Romsey and the South-East of the Borough - as recommended by the relevant topic paper. This would not only recognise the excellent transport infrastructure the area benefits from but would also align with the spatial strategy for housing advocated above and recognise that housing and economic growth support each other. For example, the SHMA 2022 indicates that population growth within the Borough alone could support between 8,600 and 8,900 jobs (2020-2040) which equates to 446 per annum.



3.38 Furthermore, provision should be made for not only the intensification of existing sites, to provide more efficient output, but also the expansion of existing businesses which also provide valuable support and employment for communities across the Borough. The failure to sufficiently refer to supporting existing businesses within the Borough is a key omission which should be addressed.

- Recognise key regional importance of the Borough to host and drive economic growth
- Work with PUSH and adjoining Boroughs to accommodate growth acknowledging the multiple benefits of hosting economic growth
- Split the Borough into three and support the demand for the Romsey & South-East area to accommodate growth
- Support the intensification of existing employment areas to provide more efficient output
- Support the expansion of existing businesses within the Borough

4. DRAPER TOOLS Ltd & OPPORTUNITIES TO MEET IDENTIFIED NEEDS

4.1 There is a clear employment and housing need that has been identified within the Borough. The analysis above not only indicates that this need is most prevalent in the Southern part of the Borough but that it also would be most sustainably met within the Romsey and South-East sub-area where the best strategic transport links are present.

THE ROLE OF NORTH BADDESLEY

- 4.2 North Baddesley is well placed to accommodate the identified growth required both through consolidating and expanding existing facilities and through accommodating sustainable growth.
- 4.3 Ranked third in the Settlement Assessment Hierarchy, and the highest of the 'Tier 2' settlements, North Baddesley is sustainably located to the North-East of the regional centre of Southampton and within close proximity of Southampton International Port, Southampton International airport and a major rail hub. It is also well connected to the national highway network, in particular the M3 and M27 motorways.
- 4.4 Test Valley Business Park and surrounding land in the same ownership provides a clear 'infill' opportunity that not only reflects the built form pattern of the existing settlement but also a landscape-led opportunity, given the composition of the field patterns in the area, that is compatible with the Green Space Strategy 2021-2031. It is clearly therefore the sequentially preferable site to accommodate development in North Baddesley. The location of the Business Park and its relationship to the Settlement and other key features is contained at Appendix 2.



TEST VALLEY BUSINESS PARK – CONSOLIDATION & EXPANSION

- 4.5 The clear initial opportunity, and the most pressing, is for the Local Plan 2040 to recognise the success of the existing employment at Test Valley Business Park and to facilitate its sustainable growth over forthcoming years. It is imperative that, if nothing else, the Local Plan safeguards the ability of existing employment sites to operate and to remain attractive employment hubs.
- 4.6 As set out in Section 2, the existing Test Valley Business Park presents opportunity for expansion, intensification and to meet limited future needs with no changes to allocation or Policy. As Section 2 also sets out, though, this in itself does little more than cater for immediate demands within the area. Nonetheless, a key outcome sought through the Local Plan 2040 is for the recognition and safeguarding of the site, its use, and existing potential for expansion and intensification
- 4.7 Opportunity also exists to expand the existing Business Park. As the plan at Appendix 3 shows, the Business Park can readily be extended into a self-contained area within the same ownership. Such expansion would support the planned growth of the existing business, providing employment opportunities in-Borough for an existing significant investor, and meet part of the identified employment need in the emerging Local Plan.
- 4.8 Such expansion could be achieved with limited impacts. The site benefits from all of the same characteristics as the current Business Park, including:
 - Visual self-containment
 - Separation from residential or sensitive uses
 - Capacity to accommodate parking and turning
 - Excellent access to strategic transport networks

- 4.9 The following uses are considered appropriate on the site (and would be a direct replication of those already established at the Business Park):
- B2 (general industrial (excluding incineration purposes, chemical treatment, landfill or hazardous waste)
- B8 (storage and Distribution)
- EC (i financial services, ii professional services, iii other appropriate services in a commercial, business or service locality
- EG (i offices to carry out any operational or administrative functions ii Research and development of products or processes and iii industrial processes).
- 4.10 Draper Tools Ltd and their appointed team can demonstrate technical acceptability regarding all known constraints crucially this includes safeguarding and retaining TPO trees (which, as a species-specific Group TPO, are designated for their group value) whilst delivering a viable access into the site.
- 4.11 The existing Business Park can readily accommodate, in addition to existing uses:
 - 13,800m² of Class B8 Warehouse
 - 2,500m² of Class E Office Space

The expansion proposed within this section would deliver an additional 2.2 Hectares of the sane uses alongside the current 8.75 Hectare site, a natural extension and consolidation of an existing commercial centre.

It is therefore considered the logical next step for the emerging Local Plan 2040 to include both as strategic allocations.



LAND ADJACENT TEST VALLEY BUSINESS PARK – HOUSING POTENTIAL

- 4.12 The site is clearly well located to accommodate some of the housing need identified by the Local Plan. Much of the land is unconstrained whilst in a highly accessible location and well-related to the existing Tier 2 Settlement.
- 4.13 In addition to meeting identified need in a sustainable location the site can also support the delivery of public open space and pedestrian permeability through the incorporation of green infrastructure. Furthermore, subject to viability, the delivery of housing would also support delivery of the improvements sought at the North Baddesley Crossroads by the 2012 Ramboll Study.
- 4.14 The size of the site and its existing green infrastructure, including belts of mature trees, would also ensure that, in combination with green buffers, the site can incorporate sufficient mitigations to enable dwellings and employment adjacent to each other without the prospect of future conflict.
- 4.15 It is therefore a logical next step for the emerging Local Plan to consider a residential allocation on the remainder of the land not proposed as an Employment allocation.

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- North Baddesley is a key part of both Southern Test Valley and the "Romsey and South-East" sub-area
- Ranked third in the settlement Hierarchy Assessment (not inc. its strategic transport context) North Baddesley is very well located to accommodate growth
- The pattern of development and the contained landscape character of Test Valley Business Park and the surrounding site marks it as the sequentially preferable expansion of North Baddesley
- Test Valley Business Park can accommodate additional employment floorspace within its grounds and should form a Local Plan allocation safeguarding and supporting existing uses and expansion within the existing site
- The Local Plan should facilitate and allocate the expansion of the Test Valley Business Park to meet Borough identified need and support sustainable growth of existing businesses at North Baddesley
- An opportunity exists, and should form a Local Plan allocation, to accommodate housing growth adjacent to the existing employment uses with landscape led buffers to ensure compatibility
- Housing development could support the delivery of open space and pedestrian permeability through planned green infrastructure
- The housing development could support the delivery of strategic infrastructure at the North Baddesley Crossroads
- Drapers Tools land holdings should be allocated in the next iteration of the Local Plan to sustainably meet the identified needs of the Borough and PUSH region



APPENDIX A – LAND OWNERSHIP



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This plan is illustrative for planning purposes only.

NORTH should be taken as the top of the page, unless clearly marked otherwise.

Scale 1:5000 @ A3

EXL | Project | Management

ADDRESS:

Land at

TITLE:

Land Ownership Plan

Ref.

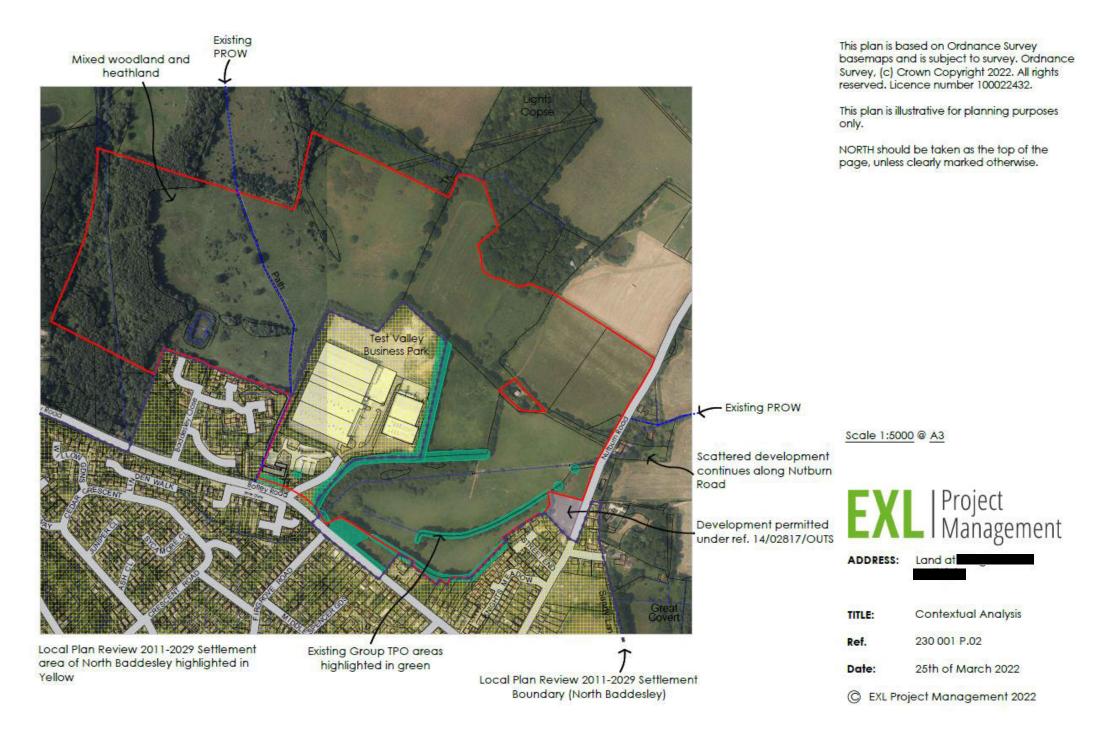
230 001 P.01

Date:

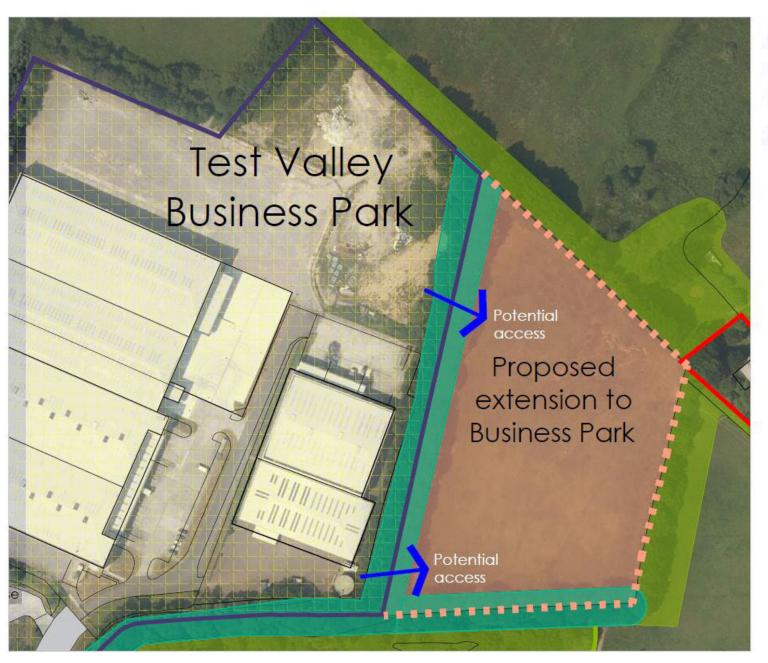
25th of March 2022

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APPENDIX B – CONTEXTUAL ANALYSIS



APPENDIX C – EMPLOYMENT LAND OPPORTUNITY



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2.2 H.A. Gross Area - Proposed extension to Test Valley Business Park

Scale 1:1250 @ A3



ADDRESS: Land at

TITLE: Employment Land Opportunity

Ref. 230 001 P.03

Date: 28th of March 2022

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