Our ref: 51089/KM/SP

Your ref: Regulation 18 Stage 1



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

By email:

08 April 2022

Dear Sir / Madam

REPRESENTATIONS ON BEHALF OF RAYMOND FARMING – HAREWOOD FARM, ANDOVER TEST VALLEY BOROUGH COUNCIL CONSULTATION FOR LOCAL PLAN 2040 REGULATION 18 STAGE 1

I write on behalf of our client, Raymond Farming Ltd, in response to the Test Valley Borough Council Draft Local Plan 2040 Regulation 18 Stage 1 consultation.

Raymond Farming Ltd is promoting land in the company's ownership, at Harewood Farm, Andover, and therefore wishes to comment on the council's proposed objectives, growth strategy and to highlight the importance of recognising this existing employment site by allocating it accordingly as an employment site within the next stage of the Local Plan. In addition, land has been put forward for housing between the existing settlement edge and the Harewood Commercial site.

Objectives, Spatial Strategy and Growth

We understand that the focus of the current stage of the Local Plan 2040 (Stage 1) is to set out the vision and objectives for the Borough Council, the spatial strategy, and to consider development needs and certain strategic policy areas, such as economy and employment.

Within the document, the council sets out that the proposed objectives of the Local Plan 2040 include:

 "Our Communities: 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.

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"Economy, Employment and Skills: 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."

To support the above, and other objectives, the draft Local Plan considers that a 'hybrid approach' of the following three options is the preferred option for distributing future development across the Borough:

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

The Spatial Strategy Topic Paper expands on the 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."

We note that the majority of housing growth across the borough is required within the Northern Test Valley (NTV), which includes Andover, with a residual requirement to plan for 3,505 in this area up to 2040.

In principle, a hybrid approach to growth is supported, particularly as it includes opportunities for growth in Andover which is one of the Borough's largest settlements and main towns and is noted as being generally urban in nature and benefitting from a greater range of existing facilities, services and other amenities, and also a number of more strategic facilities. We consider that the land at Harewood Farm is ideally situated to contribute towards meeting the projected housing requirement. The site is close to the edge of the settlement and is within a sustainable location close to existing employment opportunities and public transport links.

Employment

The National Planning Policy Framework (NPPF) (2021) sets out¹ that Strategic policies should set out an overall strategy for the pattern, scale and design quality of places, and make sufficient provision for employment development.

Whilst the draft Local Plan consultation document has not identified a strategic policy setting out whether additional commercial floorspace is required, there are general provisions in relation to supporting the economy. It notes the importance of providing a varied supply of employment land in meeting the needs of the Borough, and will seek to facilitate appropriate future levels of provision at the most suitable and sustainable locations. This approach is supported.

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¹ Paragraph 20

The draft Local Plan consultation document also identifies that initial assessments undertaken into employment needs have highlighted a very high level of forecast future growth in comparison to previous years. It anticipates that, within the Northern Test Valley (NTV), which includes Andover, there is a requirement for 311,195 sqm of employment floorspace (within classes B1c/B2/B8 use classes) across the period 2019 – 2040. Whilst the Council considers that further assessment and testing of these need figures is required, it is likely that a significant quantum of floorspace will likely be needed to support the level of housing growth.

In accordance with the NPPF, it is essential that the council's planning policies not only set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth², but also create conditions in which businesses can invest, expand and adapt in order to support economic growth and productivity, taking into account both local business needs and wider opportunities for development³.

In taking forward the Local Plan into its next stages of preparation, we encourage the Council to consider the allocation of Harewood Farm, as described below, as a recognised employment site including recognising this opportunity to allocate additional land around the existing site to enable continual investment and expansion. Furthermore, we encourage the council to draft its planning policies to support the expansion and improvement of existing employment sites, such as this.

<u>Harewood Farm</u>

Harewood Farm lies directly to the east of Andover to the north of the B3400 London Road and extends to approximately 67 hectares, of which 65 hectares is arable land. The site comprised a former poultry business and mushroom growing enterprise, which has now been replaced by commercial buildings in flexible B1c – B8 use. However, despite being an established industrial / commercial development, the site is currently designated as countryside within the adopted Local Plan, which could present a policy constraint to future development at the site.

Harewood Farm is currently accessed from the B3400 London Road, approximately 90m east of the junction between London Road and The Middleway. The site is physically well contained, bounded to the north and west by mature hedgerows and to the south and east by an access road.

To the south of the site is a number of commercial and residential buildings. To the south-west of the site at Picket Twenty a new residential development has been constructed, known as The Paddocks, Twenty One. To the west of the site, on part of the farm's wider holding, an outline planning permission for the development of up to 180 residential units (ref. 17/03153/OUTN) is pending a decision, on a site previously granted planning permission for up to 150 residential units (ref. 12/01611/OUTN).

As an existing employment location that is home to 25 businesses, this site is a key contributor to the creation of jobs and its businesses provide for a range of job opportunities. There is constant demand for the premises that are offered here and at present demand is outstripping supply. There is therefore a need for the expansion of Harewood commercial site. As such we encourage the council to support this existing employment site through its allocation and expansion, therefore recognising the role that this

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² Paragraph 82

³ Paragraph 81

site plays in providing economic benefits to Andover, and the Test Valley Borough as a whole. We also encourage the Council to consider the opportunity to provide additional residential development on the land to the west of the commercial site. We envisage that a comprehensively planned development could provide additional new homes, additional employment floorspace and so create new job opportunities, as well as associated new open space and landscaping.

Summary

The drafting of a new Local Plan provides opportunities for those with a vested interest to contribute to the growth strategies and planning policies which influence their local area. National planning policy sets out support for existing businesses which the council should ensure is reflected within its new Local Plan.

On behalf of Raymond Farming Ltd, Harewood Farm in Andover should be recognised for its contribution to the local economy and its existing status as an established employment site reflected accordingly in the emerging Local Plan. The allocation of land at Harewood Farm would enable the Council to meet a number of its strategic objectives and provide new homes alongside additional land to create employment opportunities and meet the identified need for employment floorspace.

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 sincerely,

Katherine Miles MRTPI Director