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Representation Letter_FINAL



FAO Planning Policy Department
Test Valley Borough Council
Beech Hurst
Weyhill Rd
Andover
SP10 3AJ

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Dear Sir/Madam

TEST VALLEY LOCAL PLAN REPRESENTATIONS FOR LAND BETWEEN GRATLEY AND PALESTINE, GRATLEY, PREPARED BY SAVILLS PLANNING ON BEHALF OF RACEDOWN ALPS LTD.

Savills Planning has been instructed on behalf of our client Racedown Alps Limited (hereafter referred to as 'Racedown') to make representation to the Test Valley Borough Council Local Plan Regulation 18 Consultation.

This representation specifically relates to Racedown's land interest between Grateley and Palestine ('the Site'). It is put forward as a sustainable site for employment use, appropriate for commercial, storage or industrial development.

This representation provides information on the Site's opportunities and constraints, and justification as to why it should be considered as an employment allocation in the emerging Local Plan. It is hoped that the information provided, will demonstrate the Site's suitability for such development, displaying its sustainability and deliverability in the early part of the Local Plan period.

Site Context

The Site is a parcel of agricultural land with an Agricultural Land Classification (ALC) Grade of 3 or 'Good to moderate quality arable land. It is approximately 4.65ha in area, located between the villages of Palestine and Grateley, Hampshire. The Site is approximately 4.2km south of the A303 trunk road and around 8km south West of Andover and 9.7km east of Amesbury, the nearest towns.

The Grateley Parish has a population of 664 according to the Test Valley BC Parish Profile¹ and is comprised of Grateley and Palestine. These villages are separated by Grateley Station, a railway station on the mainline between Exeter and London. The area has various facilities including a Pub 'The Plough Inn' located C.1km North East of the Site and a Primary School which sits approximately 850m North East of the Site.

The Site falls within the Test Valley Borough, for which Test Valley Borough Council is the Local Planning Authority (LPA).

The Site

The Site lies immediately to the north of the B3084 'Old Stockbridge Road', from which it could be accessed off the highway. The Site's boundaries comprise a belt of trees along the eastern boundary and hedgerow with trees on the southern and northern boundary. To the west the Site is immediately bound by a private carriageway, which serves as the access for a small commercial complex which adjoins the Sites Northern boundary.

This site to the north contains several commercial buildings with a yard area for parking HGVs and commercial vehicles. A search of the complex's planning history identifies it is currently operating as an

¹ <https://www.testvalley.gov.uk/assets/attach/15331/grateley-parish-profile-2021.pdf>



aggregate's storage and sales business, including the operation of a soil recycling facility (LPA ref. 17/02334/CMAN). The railway line between Salisbury and Andover sits immediately beyond this. To the north of the railway line, lies a treed area, with 'Station Road' located c.200m North of the Site. Beyond this road, lies cluster of agricultural structures and arable fields. Approximately 750m North East of the Site, lies the village of Grateley.

To the East of the Site lies several arable fields, with 'Pond Lane' and a cluster of agricultural/commercial buildings located c.570 and 580m east respectively. There is also a small cluster of residential properties located around 600m South east of the Site off Old Stockbridge Road. Beyond this, approximately 3km South East lies the Village of Kentsboro.

To the South, the Site abuts Old Stockbridge Road, with primarily agricultural fields and clusters of farm buildings located beyond this. The closest of these agricultural clusters lies c.480m south of the Site. There is also a cluster of residential properties, the closest of which lies 40m west of the Site. Around 275m West of the Site lies the village of Palestine. Additionally, Grateley Railway station lies 350m North west of the Site.

The Grateley Conservation area is located c.610m North West of the Site, with the nearest Listed Building, the Grade II listed 'Grateley House' located an additional 120m North West. The nearest Scheduled Monument 'Bowl Barrow' is located approximately 536m South West of the Site. The Site features no designated ecological assets, with the closest internationally designated Site 'Quarley Hill Fort' SSSI located c.1.19km North of the Site.

There are no public rights of way located on the site.

Planning Background

A review of Test Valley Borough Council's online planning register has not identified any planning history for the parcel of land to which this representation relates.

Suitability for Employment Development

Principle of development

The Site is located outside of the defined settlement boundaries of Grateley and Palestine according to the Test Valley Borough Council Revised Local Plan DPD 2016 (TVLP) Policy COM2 'Settlement Hierarchy' and the Draft Emerging Local Plan (SSP1 'Settlement Boundaries'). It is therefore considered that the Site falls within the 'open countryside' an area where there is generally a policy of restraint exercised by the LPA. Conversely there are occasions when development in these areas is acceptable in both Local and National planning policy.

Firstly, the National Planning Policy Framework (NPPF) gives the following guidance on the rural economy in paragraph 85:

'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).'

Additionally, TVLP Policy COM2. 'Settlement Hierarchy' identifies various circumstances where development is permissible outside of the settlement boundaries, stating:

'Development outside the boundaries of settlements in the hierarchy (as identified on map 1 - 55) will only be permitted if:

a) it is appropriate in the countryside as set out in Revised Local Plan policy COM8-COM14, LE10, LE16- LE18; or

b) it is essential for the proposal to be located in the countryside.'

The following development could qualify for such an exemption under TVLP Policy LE17: 'Employment Sites in the Countryside'. This policy states:

'The redevelopment, extension of buildings or erection of new buildings on existing employment sites

for employment use will be permitted provided that:

a) it is contained within the lawful employment site; and

b) the proposal is well related to any retained buildings; and

c) it does not include outside storage where this could be visually intrusive.'

The Site is located within a predominately rural area, located adjacent to an existing commercial employment site. As such development of new employment space would be well-related to neighbouring land uses, in accordance with point 'b' of Policy LE17, with few residential receptors that might be disturbed by the Site's development. Development at the Site would also conform with point c as the boundaries offer significant shielding of the Site, with the option to plant additional trees along the western boundaries of the Site to further shield any development at the Site. In this regard, it is also in accordance with the above NPPF guidance to ensure that any rural economic development is '***Sensitive to its surroundings***'.

Another significant strength of the Site in comparison to the majority of rural employment sites, is its proximity to a major railway line, located only 350m South East of Grateley Station. This provides potential employees with a convenient and fast way to reach their place of work. This is in accordance with NPPF paragraph 58 as it provides a non-vehicular based mode of transport to the Site, increasing the sustainability of the Site.

Design

The Design of any subsequent scheme would be an important planning consideration with the sitting, location and scale of development needs to be sympathetic with the local area. The materials used as well as the layout of the proposal would need to respect the amenity of any neighbouring land users whilst efficiently using the available land. There would likely be no in principle issue with design at this location as Site abuts an existing commercial premise, with few residential receptors in close proximity.

Access

The Site is currently accessed directly from the B3084 'Old Stockbridge Road' via an agricultural access. This access is partially shared with an existing commercial complex located North of the Site.

Any subsequent development at the Site would seek to provide a purpose built access sufficient to cater to commercial vehicles. It is likely that this would involve some minor work to formalise the existing access and establish sufficient visibility splays. However, given the good visibility and relatively few obstructions to the view of the carriage way, it is anticipated that drivers joining the carriage way from the Site could be afforded a good view to both the left and the right. In addition, the junction is currently utilised by commercial vehicles serving the existing employment site with few issues. It is therefore highly likely that sufficient visibility splays could be established in accordance with the guidance contained in the manual for streets.

Transport

The Site is located in proximity to major transport routes including the A303 and the A338. Any future land users would have access to these major routes, for both directions of travel, with a shared junction for routes located c.4.5km North West of the Site. Access to the junction is also fairly simple, with the B3084 linking the Site to the junction. This would minimise the need for commercial traffic to traverse multiple country lanes. This would help avoid placing undue burden on the road network, with traffic from the Site able to reach strategic roads able to cope with great quantum's of traffic quickly and conveniently. Therefore, the Site is unlikely to have an unacceptable impact on the road network.

There are also several public transport connections close to the Site. Firstly, the Site is located approximately 350m North West of Grateley Railway Station. This station is located on the Exeter to London Waterloo line

and offers connections to both Salisbury and Andover. Additionally, there is a bus stop 'Grateley Station', located 375m North West of the Site. This stop is located on the Thruxton to Andover Route and would offer enable employees at the Site to commute via public transport rather than relying on private vehicular transport.

On balance, the Site offers a number of public transport connections which would allow convenient access to it from a variety of local destinations including Andover and Salisbury. The Site is also well located in regard to the road network, with the Site unlikely to burden the existing road network.

Heritage and Landscape

Any forthcoming scheme would need to carefully consider the local character and context of the Site, the presence of any heritage assets, as well as of the quality and setting of the wider landscape.

The Site features no listed heritage assets and is not located within a conservation area. The nearest listed building is located approximately 730m and the closest conservation area is c.610m North West of the Site. Any development at the Site would not harm the setting of these heritage assets due to a combination of the distance and interceding landscape features. There is a significant number of intervening features such as a railway line, pre-existing built forms and treed areas which minimise the visibility of the Site from these assets.

Additionally, development at the Site would not alter the existing character of the area or its setting. Whilst the area is rural, it is characterised by with clusters of development located across the landscape. Agricultural units like barns, farmhouses and other such buildings are common. This in combination with the Site's proximity to Palestine, means that a cluster of development at the Site would not appear out of place at the Site. This is reinforced by the existence of other such small employment Sites in the area, including one which abuts the north of the Site, a site located of Pond Lane, 580m West.

Furthermore, harm to the landscape would be minimal due to the high degree of shielding and low visibility of the Site from various point in the landscape. For example, views from the West of the Site are fairly minimal from Palestine due to distance, topography and the presence of hedgerows across the landscape. Additionally, views of much of the site from the north are minimised by the location of the railway line, hedge cover and the existing commercial Site, which adjoins the north of the Site. Vegetation cover along the North and western boundaries minimises visibility also. This could be increased also through planting secured as part of the development. As such there would likely be no harm to the landscape or heritage value of the area as the site is not easily visible from many points across the local area. Additionally, planting could be used to

On balance, the low visibility of the Site, combined with the topography, landscape features and the character of the area means the Site will not have a negative impact on the heritage setting or landscape value of the area.

Ecology

The Site primarily consists of arable farmland, and an access track running along its western boundary. The Site does, however, contain treed boundaries to the West and North with a mixture of hedgerows and sporadic trees lining the south boundary.

It is therefore likely that the Site is currently of broadly low ecological value, however, the green infrastructure assets may provide habitat for wildlife. Any subsequent development would therefore look to enhance and retain these features to deliver biodiversity gain where possible. It is therefore anticipated that the development of the Site would be unlikely to reduce the ecological value of the area and would instead provide an opportunity to better the current value.

Residential Amenity

The Site is located in a predominately rural area. As such there are few residential receptors that would receive a reduction in their amenity value as a result of development on the Site. The closest residential receptors, a small cluster of dwellings, are located 40m west of the Site. These properties feature tall hedges

and treed boundaries which will help reduce any loss of privacy and reduce the impact of noise at generated by the proposal.

In summary, the scarcity of residential receptors as well as pre-existing boundary features will minimise any potential loss of residential amenity.

Flood Risk

Flood risk is an important material consideration. Flooding can cause unacceptable damage to human health and property. TVBC Local Plan Policy 'Policy E7: Water Management' broadly requires development to comply with national flood risk guidance in order to be permissible.

The NPPF, provides guidance on the issue of flooding in Chapter 14 'Meeting the challenge of climate change, flooding and coastal change'. Paragraph 159 gives the following guidance for the management of flood risk:

'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.'

The Site complies with the guidance contained in paragraph 159 and Policy E7: 'Water Management as it is located in an area deemed to be of low flood risk. Indeed, the Site is identified as falling within Flood Zone 1 'Low Flood Risk' by the Environment Agency flood risk mapping (see **Appendix 1**).

The Supply of New Employment Land in the Test Valley Borough

Chapter 3: Spatial Strategy

The stated aim of the Spatial Strategy, both in the draft plan document and in the supporting evidence is to ensure growth within the Borough occurs in a sustainable manner. In order to achieve this, the strategy aims to:

'The spatial strategy sets out an overarching pattern of sustainable development, taking account of our local needs, and character.'

Whilst our client broadly agrees with this sentiment, we believe that the sustainability of Grateley and Palestine have been significantly underrated. These settlements have been rated as a tier 4 settlements according to Reg 18 Local Plan Policy SSP1: Settlement Hierarchy'. These are settlements generally seen as predominately rural and suitable for limited development. Despite this, we believe that the strong transport connections available through Grateley Station, as well as the close proximity to major transport routes like the A303 and A338 mean these settlements are more sustainable than currently represented.

This is acknowledged in the *Spatial Strategy Topic Paper Appendix 1: Assessment of Spatial Strategy Options*, that the concentration of growth in at **key sustainable transport hubs** would be considered sustainable, with a strategy for locating growth at these places identified as a '*Spatial Option*'.

The following conclusion is drawn from the evaluation of this option:

'It is recognised that it is sustainable to locate development at settlements with access to good public transport. However, for Test Valley, it is considered that this may not present the most sustainable option, given the location of some rural stations, and because this approach would put significant pressure on a small number of locations, to meet our needs, whilst not adequately maintaining or enhancing the vitality of a broader range of rural communities (inconsistent with the NPPF).'

This conclusion assumes that the majority of growth would need to be accommodated in these 'transport hubs'. This is not the case, with moderate growth in these areas likely to be beneficial. Furthermore, Settlements with national rail connections and with convenient rail connections to major centres within Test valley like Andover or to those outside it like Salisbury, are currently considered as sustainable as villages

with limited facilities and moderate transport connections. We believe that it is important to recognise that places like Palestine and Grateley are more sustainable locations for employment and residential development than these settlements. Development in these places will help grow the settlements and strengthen both the rural economy and community.

Employment Land Need

Chapter 5 'Meeting Our Needs' of the draft local plan identifies and discusses the local need for local employment land. Currently there has been no target set for employment land provision, with this to follow in a subsequent draft local plan.

We broadly argue that it is very important to ensure that sufficient employment space is provided in rural locations. This position is in accordance with the NPPF, which provides the following guidance on the provision of employment land in paragraph 84:

'Planning policies and decisions should enable:

- a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings;***
- b) the development and diversification of agricultural and other land-based rural businesses;***
- c) sustainable rural tourism and leisure developments which respect the character of the countryside;***
- and***
- d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.'***

This guidance clearly states the importance of locating sufficient employment land in these areas and encourages the facilitation of growth and expansion of the rural economy. The allocation of this Site is therefore in accordance with the above guidance as it would help provide much needed employment space in the Grateley Parish.

The Site is in single ownership and would be imminently available for development this would allow it to be built out quickly in comparison to larger employment sites which can get held up with through a variety of factors. Thus, it can make an important contribution to the supply of employment land within the Borough.

To summarise, we believe that the Site at Land Between Grateley and Palestine can make an important contribution to the rural economy. We would strongly encourage the Council to ensure there is sufficient employment space within the borough by identifying the need for land and allocating appropriate land for such use.

Conclusion

In summary, we consider that the Site is a sustainable location for employment development. The proposal would represent sustainable development as it is located in close proximity to major road connections, is in a settlement with national railway links and would help boost the local economy.

We believe that the Council should make adequate inclusion for the development of employment Sites in rural areas to ensure rural communities thrive and grow. We also believe that it is important to recognise the sustainability of locating development in major transport corridors and argue the spatial strategy should reflect this.

Racedown Alps Ltd present land between Grateley and Palestine as an available and developable Site, which can make an important and effective contribution to the Borough's employment land supply, with its simple ownership situation and fairly quick deliverability. This would make it a highly suitable site for allocation for employment development.



Yours faithfully

Daniel Gardner
Graduate Planner

Appendix 1

Land Between Grateley and Palestine: Indicative Location Plan



Ordnance Survey © Crown Copyright 2022. All Rights Reserved. Licence number 100022432

Flood map for planning

Your reference
Site FR Map

Location (easting/northing)
427128/141067

Created
7 Apr 2022 20:00

Your selected location is in flood zone 1, an area with a low probability of flooding.

This means:

- you don't need to do a flood risk assessment if your development is smaller than 1 hectare and not affected by other sources of flooding
- you may need to do a flood risk assessment if your development is larger than 1 hectare or affected by other sources of flooding or in an area with critical drainage problems

Notes

The flood map for planning shows river and sea flooding data only. It doesn't include other sources of flooding. It is for use in development planning and flood risk assessments.

This information relates to the selected location and is not specific to any property within it. The map is updated regularly and is correct at the time of printing.

Flood risk data is covered by the Open Government Licence which sets out the terms and conditions for using government data. <https://www.nationalarchives.gov.uk/doc/open-government-licence/version/3/>

Use of the address and mapping data is subject to Ordnance Survey public viewing terms under Crown copyright and database rights 2021 OS 100024198. <https://flood-map-for-planning.service.gov.uk/os-terms>

Flood map for planning

Your reference

Site FR Map

Location (easting/northing)

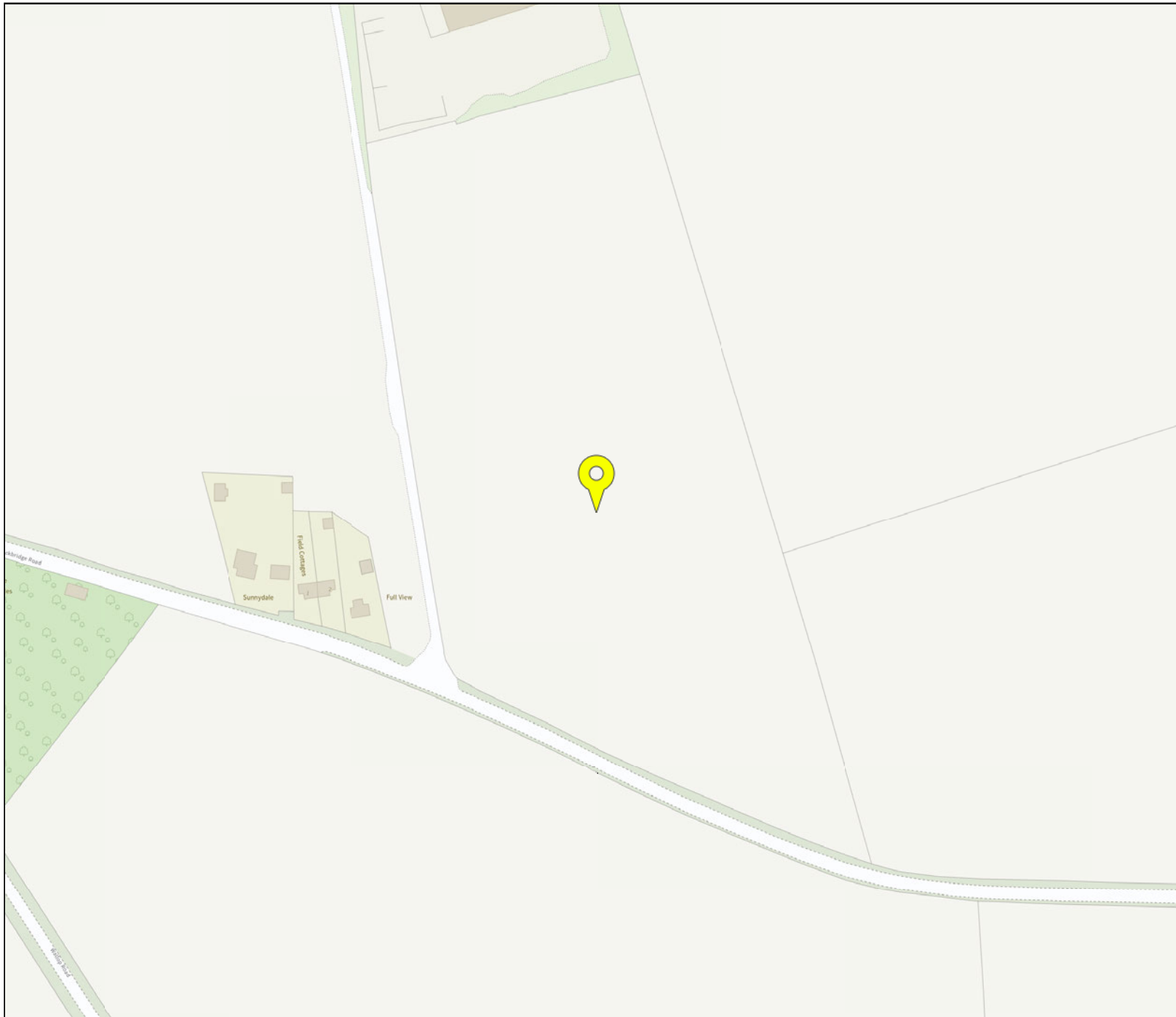
427128/141067


Scale

1:2500

Created

7 Apr 2022 20:00



-  Selected point
-  Flood zone 3
-  Flood zone 3: areas benefitting from flood defences
-  Flood zone 2
-  Flood zone 1
-  Flood defence
-  Main river
-  Flood storage area

