

7 April 2022
Representation Letter_FINAL



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

Daniel Gardner
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Dear Sir/Madam

TEST VALLEY LOCAL PLAN REPRESENTATIONS FOR LAND AT RACEDOWN BARNES, THRUXTON DOWN, PREPARED BY SAVILLS PLANNING ON BEHALF OF RACEDOWN ALPS LTD.

Savills Planning have 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 at Racedown Barnes, Thruyton Down Road, Thruyton Down ('the Site'). It is put forward as a part brownfield Site, appropriate for up to 12 units of sustainable residential development.

This representation provides information on site opportunities and constraints, and justification as to why the Site should be considered as a housing allocation in the Test Valley Borough Council Local Plan. It is hoped that the information provided, will demonstrate the Sites suitability for residential development, displaying its sustainability and deliverability in the early part of the Local Plan period.

Site Context

The Site is located at Thruyton Down, which is approximately 2.5km West of the village of Thruyton and approximately 25m North of the A303. The Site is also located around 7km West of Andover and 9km east of Amesbury. The nearest cities of Salisbury and Winchester are located c.16km South West and c.24.5km South East respectively.

The Parish of Thruyton had a population of 650 according to the 2011 Census. The Parish of Thruyton includes the village of Thruyton, as well as three small settlements, the villages of Parkhouse Cross, Thruyton Down and a cluster of residential properties on the westerly side of Dauntsey Lane. The Parish also features 'Thruyton Aerodrome' which is located approximately 1.25km North-East of the Site.

The Site has relatively convenient and simple access to a variety of key services and amenities within close proximity. Firstly, the nearest Store is located c. 3.7km North West in Shipton Bellinger. The nearest superstore is located in Tidworth, c.4.68km North West of the Site. The Site also has access to 3 primary schools within 5km, the closest of which, Grateley Primary School, is located approximately 2.9km South West.

The Site

The Site was historically part of a wider agricultural holding, which has subsequently been sub-divided. It currently houses a collection of Barns, as well as two small paddocks. More details of the layout of the Site, including a plan showing the location of each barn in relation to the Site can be seen in **Appendix 1**.

Barns 1, 2 and 3 are currently used as part of mechanic's workshop. These barns were the subject to historic planning application ref. 17/02078/FULLN, obtained consent for the change of lawful use of Barns 1 and 3 to Use Class B8 (storage and Distribution) and Barn 2 to Class B2 (General Industrial). Barn 4 has remained in agricultural use, primarily use for 'agricultural storage' purposes. The Site also features a single standalone

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toilet cubicle to support the vehicle repair business, permission for which was secured through application ref. 18/02466/FULLN.

The Site also contains two small paddocks, were formally used for grazing livestock, however, due to their small size and isolated locations in relation to the agricultural holding, their use for agricultural purposes has ceased over recent years

The Site is immediately bound by a residential property to the North, with a degree of separation provided by a hedgerow. Beyond the property, lies Thrupton Down Road with another residential dwelling lying c.30m North of the Site. Further to the North, lies several clusters of farm units and agricultural fields, the closest cluster is located c.110m away from the Site. To the North East lies a mixture of residential dwellings and fields, including the Grade II listed Racedown Cottage c.50m north. Beyond the housing lies agricultural fields and the Thrupton aerodrome.

To the East the Site is bordered by a residential property which has been converted to an office which lies approximately 36m away from the Site. The boundary between these properties features a treed area, protected by a Tree Preservation Order (TPO), on land under the control of the neighbouring property. These trees offer a degree of separation between the Site and the property. Further east, there is sporadic development and several treed areas, the closest of which lies c.160m away. The villages of Thrupton and East Cholderton lie c.2.45km and c.3.3km further East respectively.

To the South, the Site's boundary primarily consists of a treed area with hedgerow also present. This offers a buffer to the A303 which lies 25m south of the Site. South of the A303, there are predominately fields with clusters of development present including a small industrial area c.700m south east and the village of Quarley approximately 1.1km South East.

The west of the Site features sporadic tree cover and hedgerows, with the boundary treatment consisting of a wooden fence. A residential property lies adjacent to the Site's boundary, c.5m West. Further to the west, approximately 40m away from the Site lies another residential property. Beyond these dwellings, there are primarily fields, with the village of Snoddington lying 2.4km North West of the Site.

Suitability for Housing

Principle of Development

The Site is located outside of the defined settlement boundaries of Thrupton, within Thrupton Down. Thrupton Down has not been assigned settlement boundaries by either the current adopted local plan (Test Valley Borough Revised Local Plan 2016) Policy COM2 '*Settlement Hierarchy*' or within the emerging local plan (SSP1 '*Settlement Boundaries*'). As a result, the Site has therefore been identified as falling within the open countryside. Historically within such locations development has been strictly controlled by the LPA.

Despite this, there are circumstances identified in the National Planning Policy Framework (NPPF) when development in such locations might be acceptable. One such occasion is identified in paragraph 80, which states:

'the development would re-use redundant or disused buildings and enhance its immediate setting'.

The Site contains commercial uses which could be converted or replaced by residential units to improve the visual amenity of the area and the residential amenity of neighbouring properties. The Barns are of a modern construction, with an industrial appearance. These structures therefore have poor architectural value and do not positively contribute to the character of the area. Thus, there is significant opportunity for the reuse or replacement of these buildings to provide housing and enhance the setting of the area.

Additionally, the General Permitted Development Order 2015 (as Amended) contains certain provisions which allow the conversion of agricultural buildings to serve as dwelling houses under Class Q of Under Schedule 2, Part 3. Ordinarily all of the barns at this Site would be eligible for conversion under this right to 5 residential

units not exceeding 500 sqm. Although, in this case, the conversion of Barns 1, 2 and 3 have made them ineligible for this right.

The Site is also put forward for residential development as it represents a sustainable and immediately deliverable brownfield housing site. Indeed, a significant portion of the Site has previously been developed and utilised firstly as part of an agricultural holding, then more recently as a car repair business. The 'undeveloped' portion of the Site was also previously used for the grazing of livestock, however, the small scale and isolated nature in relation to the wider agricultural holding led this to become unviable. As such the 'undeveloped' portion of the Site lies disused.

The principle of development at this Site is therefore supported by national planning policy regarding sustainability and the use of brownfield and underutilised land for residential development, as this is broadly encouraged. NPPF Chapter 11 '*Making effective use of land*' broadly requires developers and planning decision makers to

'make as much use as possible of previously-developed/brownfield land.'

Additionally, NPPF paragraph 120c states planning policies and decisions should:

'give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land'

Whilst there is not a specific policy encouraging the Re-use of brownfield and under-utilised land in the adopted development plan, paragraph 5.30 of the TVBC Local Plan 2011-2029 in relation to Housing provision states:

'The Council is not proposing a target for development on Previously Developed Land (PDL) (also known as brownfield land) but does support the approach of development of brownfield land wherever appropriate.'

Development at this Site is in accordance with the above guidance as it uses brownfield land within a settlement, albeit within a minor settlement, to accommodate housing development. This is a more suitable use for the Site as it is in proximity to residential properties but is currently utilised as a car repair business. As such the 3 of the barns, are lawfully used as either B1 or B8 except for 'Barn 4' (See **Appendix 1**). Industrial uses within a settlement can be problematic, with the car repair business having historically attracted concern and complaints from neighbours. Additionally, if the Paddock were to resume its use for agricultural purposes this could also cause significant loss of amenity through the noise generated by agricultural practices, vehicles and the movement of animals. It would therefore be a more efficient and appropriate use of the Site to convert or replace the existing barns and paddock areas to provide housing.

Loss of Employment Land

The following proposal would seek to replace a small scale rural commercial site with residential dwellings. This would result in the loss of an employment space. Local Plan Policy LE10: 'Retention of Employment

Land and Strategic Employment Sites' provides circumstances where the loss of employment space is permissible.

The policy states:

*'On existing employment sites, allocated employment sites, or sites with planning permission for employment use, which have not yet been fully implemented, development for an alternative use will be **permitted provided that:***

a) the land is no longer required to meet economic development needs of the area; or

b) the current activity is causing, or could cause significant harm to the character of the area or the amenities of residents; and

c) it would not have a significant detrimental impact on the operation of the remaining occupiers of the site.'

The proposal meets the requirements of this policy. The current employment space relates poorly to the neighbouring land users. Indeed, the current car repair business is located to the rear of 'Potala House', a residential property, with the neighbouring property to the West also in residential use. As such, the current industrial use of the Site is detrimental to the amenity of these neighbouring users generating significant noise. Additionally, the site is occupied by a single business, as such the closure of the unit would not detrimentally impact any other businesses. Therefore, the proposal accords with paragraphs b and c of Policy LE10.

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 existing residents whilst efficiently using the brownfield land. There would likely be no in principle issue with design at this location as the existing barns are of low architectural value and could be replaced with more attractive and well-designed properties.

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 50m north east of the Site.

The Character of the area is rural with clusters of development sporadically located across the landscape. Agricultural units like barns, farmhouses and other such buildings are also common. Whilst some of these buildings could be of high architectural value, those present on the Site are fairly modern barns, consisting of corrugated iron cladding and cement roofing sheets and other industrial materials. As such they are of low architectural value and their loss would benefit the appearance of the area. It is therefore likely that the replacement of these barns with sympathetically designed residential dwellings would enhance the landscape quality and character of the area. It is also likely that it would represent a betterment to the setting of the nearby heritage asset.

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 South of the Site are fairly minimal from established settlements like Quarley and the conservation area in the village or Cholderton 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 a residential property which adjoins the north of the Site. Vegetation cover along the east and western boundaries minimises visibility also. 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.

On balance, the low visibility of the Site, combined with the low architectural value of the existing modern barns would mean their replacement is highly unlikely to negatively impact the landscape or setting of the listed building.

Residential Amenity

The allocation of the Site for residential development has the potential to dramatically improve the residential amenity of the existing residents. The Site is located in close proximity to Potala House which adjoins the Site and Downlands, a residential property located 5m west of the Site. These properties are currently disturbed during the operation of the vehicle repair business as tools and machinery together with the vehicle comings and goings can generate significant noise. The replacement of the existing industrial uses with a residential use would, therefore, likely generate significantly less noise and result in improved residential amenity for these neighbouring properties.

The existing boundary treatments, hedge rows and trees, combined with sympathetic design could also result in the proposed housing causing minimal harm to the existing residents. This is because the loss of privacy could be minimised through the siting and orientation of the units, whilst the retained trees and hedges would help minimise any loss of privacy. These boundary treatments will also be retained to help reduce the noise resulting from the A303 to the South together with any appropriate acoustic fencing.

In summary, the replacement of the existing industrial uses would likely result in a net gain in amenity value for residents of neighbouring residential properties.

Access

The Site currently possesses two accesses from 'Thrupton Down Road'. These accesses currently serve the car repair business. These accesses possess good visibility onto the highway and could be sufficient to accommodate the additional trips generated by the Sites residential use.

Despite this, a new purposed designed access would likely be created on the wider part of the paddock frontage. This would ensure that future residents would be able to access the Site safely and in accordance with the guidance contained in the manual for streets.

The proposed access would possess good visibility with relatively few obstructions due to the relatively straight roadway and flat topography combined with the openness of the highway boundaries in this section of Thrupton Down Road. This affords drivers joining the Thrupton Down Road a good view of the carriage way to both the left and the right. This also allows those drivers travelling along Thrupton Down Road from either direction, a clear view of those potentially joining the highway. It is therefore anticipated that sufficient visibility splays could be established in accordance with the guidance contained in the manual for streets for roads with the national speed limit (60mph).

Transport

The Site is located in proximity to major transport routes including the A303 as well as the A338. Future residents would have access to a junction on the A303 North-east bound within C.1.1km and South-west bound within C.3.35km, with minimal need to traverse lower capacity country lanes. As such the development Site is well located in terms of connections to roads best able to cope with higher quanta of traffic.

The proposed development is limited in scale and would be unlikely to cause significant impact on the road network. This would likely generate a similar number of trips as the existing commercial property, especially given the premises is used for vehicle repair.

Additionally, the potential residents of residential units at the Site would be able to utilise various public transport services. Firstly, the Site is located c.3km North East of Grateley Railway Station and approximately 9.25km west of Andover Station. These stations provide frequent rail services to London, Exeter, Andover

and Salisbury. The Site is also located approximately 1km North west of the Quarley War Memorial Bus Stop. This stop is on the route between Andover and Thruxton, calling at Grateley Rail station. This provides relatively convenient access to the services located within local service centres like Salisbury or Andover via public transport. Furthermore, elderly residents would be able to utilise the Test Valley Call and Go Service, which operates as an affordable, community run transport service. This would help minimise the reliance of elderly residents on the private motor car as the sole mode of transport.

Overall, the site is well located in terms of private vehicle and rail routes and would likely have a similar impact on the local road network as the existing commercial premises.

Ecology and Biodiversity

The Site primarily consists of modern commercial barns, an access track and mowed grassland. The Site does, however, contain a heavily treed Southern and Eastern boundaries as well as sporadic clusters of trees around the Site. There is also a hedgerow located along the boundary of the Site and Potala House. This is a *Leylandii* hedge.

It is therefore likely that the Site is currently of broadly low ecological value, however, the green infrastructure assets may be of higher value and provide habitat for wildlife. For example, the Eastern boundary of the Site features trees protected by a TPO. It is highly likely that these trees are of higher ecological value than the rest of the Site. Thus, it is therefore proposed that any protected trees on the Site would be retained. Any subsequent development would therefore look to enhance and retain these features to deliver biodiversity gain where possible but would be unlikely to reduce the ecological value of the area by redeveloping the existing built form.

The supply of new market and affordable homes 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, rural communities should be allowed limited development in order to grow and evolve. This should include the ability to infill and convert commercial and industrial buildings within smaller settlements. The local plan consultation document identifies that there are significant issues with an aging population across the borough (para 2.55), which is more acutely felt in small rural communities. This is because the access to services and social support networks tends to be smaller than in larger communities.

Allowing small scale infilling and conversion of existing buildings and brownfield would be highly beneficial to settlements like Thruxton Down, as it would allow them to grow in a sustainable manner and help counter the ageing population in rural areas by introducing family housing. Therefore, settlements like Thruxton Down, which are well connected via the road network could offer important small scale rural housing sites through infilling, conversion of existing buildings and small scale housing development.

Housing Need

Chapter 5 'Meeting Our Needs' of the draft local plan identifies and discusses the local areas housing needs. The applicant broadly agrees with the Council's desire to provide more affordable and market housing across the Borough. It is important to set realistic and achievable housing targets that will enable the area to grow and prosper over the full plan period.

We agree that much of the growth should be accommodated in the major settlements in the Borough like Romsey or Andover, but we strongly believe the Council should also consider the important contribution small

and medium scale housing sites in settlements below tiers 1 and 2, can make to the Housing requirement of an area. Indeed, this view is supported by the NPPF which gives the following guidance in paragraph 69:

‘Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:

- a) identify, through the development plan and brownfield registers, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved;***
- b) use tools such as area-wide design assessments and Local Development Orders to help bring small and medium sized sites forward;***
- c) support the development of windfall sites through their policies and decisions – giving great weight to the benefits of using suitable sites within existing settlements for homes; and***
- d) work with developers to encourage the sub-division of large sites where this could help to speed up the delivery of homes.’***

This is also acknowledged in the Housing topic paper to a degree, with paragraph 2.13 of the housing topic paper echoing the NPPF guidance.

The strength of such sites is that they may be built out quickly in comparison to larger sites which can get held up with through a variety of factors. It is therefore important to identify sites which can be quickly delivered in a simple and efficient manner.

The following Site can offer up to 12 dwellings on brownfield land, in a sustainable location. The Site is also in single ownership, which decreases the likelihood of delays through ownership disputes or disagreements. The Site is, therefore, immediately deliverable, policy compliant and can make an important contribution to the Boroughs housing requirements.

Conclusions

In summary, we consider that the Site is a sustainable location for residential development. The proposal would represent sustainable development as it recycles brownfield and under-utilised land, is in a settlement with strong road connections and would replace an existing unsuitable use in a residential area.

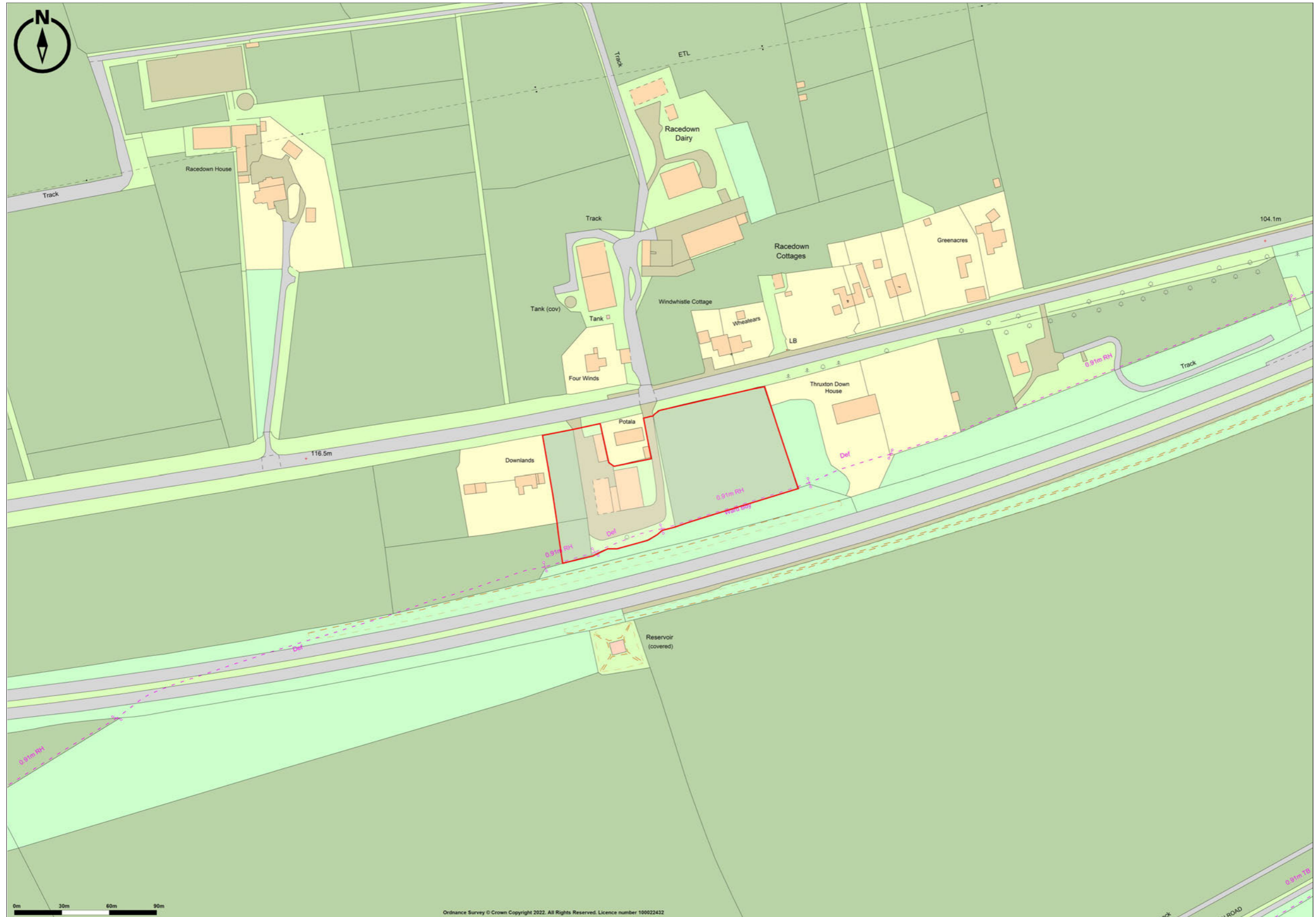
We believe that the Council should make adequate inclusion for the development of small scale market housing Sites in rural areas to make use of brownfield sites as well as opportunities to infill villages in order to ensure rural communities thrive and grow.

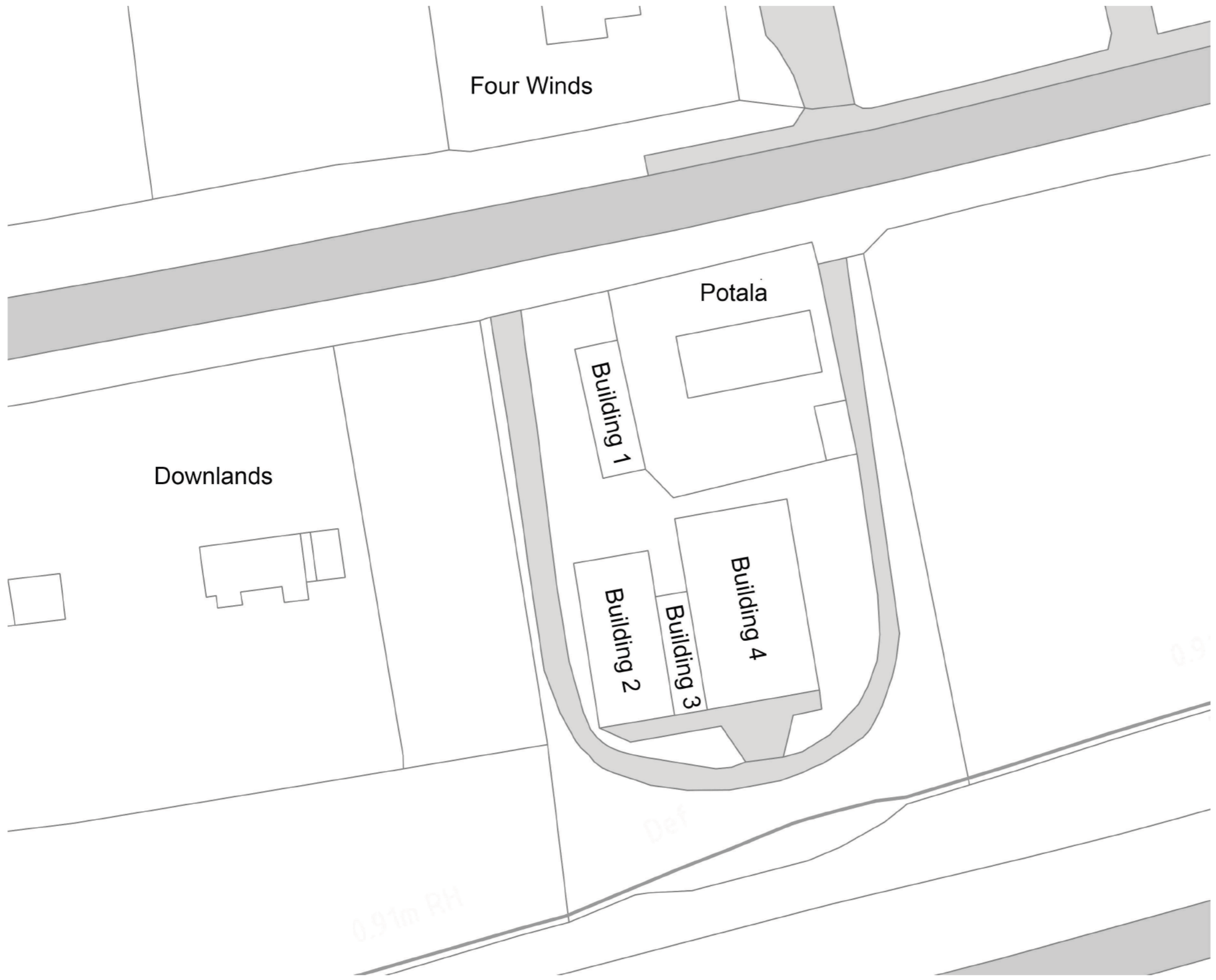
Racedown Alps Ltd present land at Racedown Barns as an available and developable Site, which can make an important and effective contribution to the borough’s land supply, with its simple ownership situation and fairly quick deliverability. This would make it a highly suitable site for inclusion in the 10% of small and medium Sites in the Councils housing requirements.

Yours faithfully

Daniel Gardner
Graduate Planner

Appendix 1





PROJECT DETAILS		
Barns at Racedown Farm, Thruxton		
DRAWING TITLE		
Block Plan		
SCALE		
1:500 @ A3		
DRAWING STATUS	JOB NUMBER	REV
Planning	TRP 1908	
DRAWN	CHECKED	DATE
RY	JH	01/08/2017

