

Land at Rownhams Lane, Rownhams

Regulation 18 (Stage 2) Consultation - Representations

ON BEHALF OF CEG

April 2024

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1. Introduction

- 1.1 These representations are made to Test Valley Borough Council's ("**the Council**") draft Local Plan 2040 (Regulation 18, Stage 2) Consultation ("**the Consultation**") on behalf of CEG. The Consultation precedes an expected Regulation 19 consultation of the draft Local Plan in Q1 2025 and its submission for Examination in Q2 2025, having regard to the Council's Local Development Scheme (November 2023).
- 1.2 The Consultation comprises a full draft of the emerging Local Plan, including its preferred spatial strategy and distribution of development across the Borough, as well as more detailed policies, following a Regulation 18 (Stage 1) consultation in April 2022. Along with the Consultation, there are a range of associated evidence base documents including Interim Sustainability Appraisal ("**the SA**"), an updated Strategic Housing and Land Availability Assessment (January 2024) ("**the SHLAA**"), Housing Trajectory (January 2024), Infrastructure Delivery Plan and various topic papers.
- 1.3 CEG's interest in the Consultation is that it is the sole freehold owner of available and suitable land for residential development, in a sustainable location at Rownhams Lane, Rownhams ("**the Site**"). A location plan of the Site is at **Appendix A**.
- 1.4 The Site is well known to the Council following call for sites submissions and inclusion in the SHLAA (site reference 201), as well as representations by CEG to previous consultations of the emerging Local Plan.
- 1.5 The SHLAA recognises that residential development of approximately 300 dwellings is achievable on the Site, with the SA considering as well that significant development (of some 210 dwellings) could be accommodated. The Site is also located adjacent to the settlement boundary of the Tier 2 settlement of Nursling & Rownhams (following the proposed alteration to the urban area as depicted on the Proposals Map in order to include the now substantially completed adjacent development by Taylor Wimpey). The Consultation¹ places Tier 2 settlements behind only the largest towns of Andover and Romsey, and recognises their suitability for the largest scale of strategic development.
- 1.6 The Settlement Hierarchy Assessment (February 2024) reinforces the sustainable credentials of Nursling & Rownhams, with it scoring highly in terms of access to facilities and services, positioned on the edge of the wider urban area of Southampton.
- 1.7 The Site's merits for residential development are presented in greater detail in Section 7 below, along with a Concept Masterplan prepared by CEG (**Appendix B**), but it is identified here that:
 - the Site is in a sustainable location, close to major employment opportunities, and walking or cycling distance to many local services / facilities, including primary school, medical centre and supermarket;
 - the Site is well contained in the landscape, with areas of woodland to the east and south, the M27 motorway to the north and existing residential development to the west;
 - ecological impacts can be avoided or mitigated through appropriate buffers to the ancient woodland, provision of alternative recreation space (SANG) adjacent to the north of the built area, and measures to ensure nutrient neutrality for the Solent; and

¹ Spatial Strategy Policy 1 (SS1): Settlement Hierarchy

- the Site is available for development now, enabling development to be substantially delivered within the first five years of the plan period post adoption.

1.8 These representations are structured to respond to the Consultation as follows:

- Section 2 addresses housing requirement and delivery;
- Section 3 makes submissions on housing market areas;
- Section 4 considers the supply of housing identified by the Consultation;
- Section 5 assesses the proposed settlement hierarchy;
- Section 6 refers to the Council's preferred spatial strategy;
- Section 7 presents the opportunity for development on land at Rownhams Lane; and
- Section 8 provides an overall conclusion.

2. Housing Requirement

- 2.1 Consistent with paragraph 61 of the National Planning Policy Framework (“**the Framework**”), the Consultation identifies that the extent of housing growth in Test Valley Borough must start from a local housing need assessment using the standard method. It presents this local housing need as 550 dwellings per annum (dpa), which over a 20 year plan period amounts to 11,000 new homes.
- 2.2 CEG agrees with the Consultation that there is no evidence of exceptional circumstances to justify an alternative approach to that starting point. However, CEG has significant concerns that the Council has not taken other key factors into consideration when determining the housing need within the draft Local Plan. This ultimately raises questions around consistency with paragraph 61 of the Framework and the soundness of the plan as a whole.

Unmet Need of Neighbouring Authorities

- 2.3 The Council must work positively with other authorities within the Partnership for South Hampshire (PfSH) subregion to accommodate housing need that cannot be met from across that wider area. Framework paragraph 11 requires a Local Plan to accommodate any needs that cannot be met within neighbouring areas, reinforced by reference to such cooperation in the tests of soundness (paragraph 35).
- 2.4 There are well established, voluntary cross border working practices between the PfSH authorities that most recently have published a Spatial Position Statement (December 2023) identifying a significant shortfall of available housing land across the area. In respect of the Consultation and emerging Local Plan, of significance are:
- New Forest District Council’s unmet housing need of 5,652 dwellings and its submissions to Test Valley (in representations to the previous Regulation 18 consultation) of the likely need for the emerging Local Plan to accommodate some of that amount;
 - the formal request of Havant Borough Council² for Test Valley Borough to plan to meet some of its housing shortfall as identified in the examination of the draft Havant Local Plan; and
 - the consequence of the 35% urban uplift for Southampton City Council, where the Framework (paragraph 62) makes provision for those homes to be accommodated beyond Southampton’s administrative boundary where voluntary agreement (such as with the PfSH authorities) is in place.
- 2.5 For Eastleigh, it is noted that its unmet need is as a result of modifications to its Local Plan in response to concerns of the Inspector at Examination. A review of the Eastleigh Local Plan, seeking to address that housing shortfall, is being progressed.
- 2.6 Despite the evidence presented by the PfSH Spatial Position Statement and formal approaches made to the Council, the draft Local Plan does not properly consider how it could positively respond to help address the wider shortfall of housing supply. The position of the Consultation that the Council would undertake a future review of the emerging Local Plan to consider unmet need of other PfSH authorities does not positively engage with the issue where there is opportunity to do so now.
- 2.7 There are currently a number of Local Plans undergoing Examination in Public wherein Inspectors have raised fundamental concerns with Councils not positively engaging in neighbouring authorities’ unmet need. In the case of Charnwood’s emerging Local Plan, the Council only agreed to accommodate some of neighbouring Leicester’s

² Table 1, Housing Topic Paper (February 2024)

unmet need at the EiP hearing stage, which has resulted in a continuing 18 month delay to the adoption of the plan. Similarly, in the case of the emerging Shropshire Local Plan, the Inspectors have raised fundamental concerns regarding the Council's approach to accommodating some of the Black Country authorities' unmet need. This is despite the plan including a mechanism to review the plan at a later stage. Again this has resulted in a significant delay to the plan's adoption

- 2.8 It is therefore clear that the Council should engage further with neighbouring authorities at this stage and an agreed position, of what unmet housing need the Council should accommodate, reached in the making of this current emerging Local Plan. In particular, the southern part of Test Valley has a very strong functional relationship with Southampton, with employment opportunities and shared services / facilities, that reinforces the need for positive cross-border cooperation so to address the housing shortfall across the Solent. Dealing with this issue by way of a review mechanism is clearly not an effective (Paragraph 35 of the Framework) approach to preparing the Local Plan as it kicks the issue down the road. CEG therefore object to the Council's approach.

Need for Affordable Housing

- 2.9 Beyond the Council's local housing need (550 dpa), plus the contribution it should make towards unmet housing need across the PfSH area, other factors should be taken into consideration to inform the housing requirement, consistent with paragraph 61 of the Framework.
- 2.10 Justification of a higher level of housing growth is supported by the Council's need for affordable housing. The Council's Strategic Housing Market Assessment (2022) quantifies a significant requirement of some 652 affordable homes per year (beyond that which the standard method would provide for) , concluding that:

Overall, however, the analysis identifies a notable need for affordable housing, and it is clear that provision of new affordable housing is an important and pressing issue in the Borough. It does however need to be stressed that this report does not provide an affordable housing target; the amount of affordable housing delivered will be limited to the amount that can viably be provided. The evidence does however suggest that affordable housing delivery should be maximised where opportunities arise.³

- 2.11 Whilst the standard methodology includes an affordability adjustment, the Planning Practice Guidance is clear that when applied to the standard methodology formula it only starts to address such issues. It is not a full solution to problems of affordability:

*"The affordability adjustment is applied in order to ensure that the standard method for assessing local housing need responds to price signals and is consistent with the policy objective of significantly boosting the supply of homes. The specific adjustment in this guidance is set at a level to ensure that minimum annual housing need starts to address the affordability of homes."*⁴

- 2.12 In this context, it is also noted that Test Valley has experienced a worsening trend in relation to affordability for a number of years, with its latest average house price to workplace based earnings ratio having risen by a factor of 1.56 in 20 years, reaching 10.9⁵ in 2022, further demonstrating the severity of the situation in a national and regional context.

³ AH Need, Key Messages, Strategic Housing Market Assessment (2022)

⁴ Paragraph: 006 Reference ID: 2a-006-20190220

⁵ House price to workplace-based earnings ratio - Office for National Statistics (ons.gov.uk)

- 2.13 Despite this clear and pressing need for affordable housing, the Consultation explains that the Council has not sought to meet the full affordable housing need because this would result in a housing requirement of 1,222 dpa, which it considers could not be met given limitations on the demand for market housing. However, given the objective of the Framework to boost the supply of housing, and given the available supply of suitable housing land in sustainable locations (including the Site), the Council should progress an increase to its housing requirement (even if more proportionate, less than 1,222 dpa) that would still lead to a meaningful increase in affordable homes across the Borough.

Economic Growth and Prosperity

- 2.14 The number and distribution of new homes to be provided in Test Valley must have regard to the Framework's economic objective to build a strong, responsive and competitive economy, by ensuring sufficient land for development is available in the right places, consistent with paragraphs 8, 61, 85 and 86. The Council's 'Employment Needs Further Analysis Study' (July 2023) ("**the Employment Study**") identifies that the Borough is split between two functional economic market areas – one focussed around Andover, the other forming part of the wider reach of Southampton City.
- 2.15 The economic opportunity and vibrancy of Southampton (a major port and hub of international trade), unsurprisingly, is much greater than that of Andover. This is reflected in the Employment Study, which presents the gross employment land need of southern Test Valley (some 40.4 ha) against the lesser requirement for northern Test Valley (some 31.3 ha). Despite Southampton's recognised economic dynamism, the split of housing in Test Valley remains skewed towards the northern area.
- 2.16 To address this, to provide new homes where they would best support economic growth, job creation and future prosperity (so to not unduly constrain the needs of business and employers), there should be a meaningful uplift in the supply of housing in southern Test Valley and areas closest to Southampton (which should include development on the Site). To not do so would be contrary to national policy and could not be considered an appropriate strategy against the tests of soundness.

Plan Period

- 2.17 The plan period of 2020-2040 provides a timeframe of 20 years but, in reality, the Council's Local Development Scheme (November 2023) suggests that examination of the emerging Local Plan won't take place until the second half of 2025 with adoption in Q2 2026 at best.
- 2.18 Given the Framework requires a plan to look ahead over a minimum 15 year period from adoption (paragraph 22), it is considered that a start date of 2020 is too early, noting adoption on the Council's best case is some six years after that. More significantly, with adoption estimated in Q2 2026 (a timeframe that is considered to be somewhat optimistic), the plan period is too short. At best it would cover 14 years, but that is likely to reduce through inevitable delays to the plan making timetable, failing to meet the requirements of the Framework.
- 2.19 Accordingly, it is considered that the plan period should be extended, potentially to approximately 20 years post adoption, ensuring it can be as forward looking at possible, be aspirational (paragraph 16b of the Framework) and provide longer term certainty for residents and stakeholders.
- 2.20 With such an increased plan period, the Council must identify additional suitable and deliverable sites for housing growth.

Conclusion on Housing Requirement

- 2.21 Overall, CEG strongly objects to the Consultation, including Policy SS3 (Housing Requirements), for reasons that its approach cannot be considered positively prepared or justified where it is not seeking to deal with unmet need of neighbouring authorities; where a significant need for affordable housing would not be addressed; and that the economic opportunities arising from Southampton are being suppressed. The Consultation is also contrary to national policy in not planning for growth across a period of at least 15 years post the likely date of Local Plan adoption.
- 2.22 On this basis, the emerging Local Plan as set out in the Consultation cannot be considered as a sound basis for the Council to progress with further plan making.

3. Housing Market Areas

- 3.1 The Consultation proposes a split of the Council's housing requirement between two areas it seeks to define within the Borough of northern Test Valley (NTV) and southern Test Valley (STV).
- 3.2 Whilst historically the Council has progressed a similar approach, this was based on a boundary (between NTV and STV), just to the north of Romsey, that generally accorded with the southern part of the Borough being within the sub regional PfSH area. However, with regard to the proposed change to the boundary, presented by the Consultation, to much further north, just beyond Stockbridge, any previous relationship in respect of the PfSH area would be lost.
- 3.3 More significantly, the proposed two housing market area approach by the Council is not supported by the latest revision to the Framework (December 2023). Indeed, Framework paragraph 67 and the Planning Practice Guidance⁶ (updated 05/02/24) refers only to a *single* housing requirement across any planning authority area, i.e. the whole of Test Valley Borough. The importance of this (of having a single requirement across a single area) is reinforced by local housing need (using the standard method) being calculated on a borough wide basis, as well as measurements to inform the Housing Delivery Test. This understanding of national policy is affirmed by a s.78 appeal Inspector⁷ that revisions to the Framework are significant, as a change in policy, now with the expectation of one single housing requirement.
- 3.4 For reasons that having two housing market areas within Test Valley is not justified and not consistent with national policy, CEG objects to the approach set out by the Consultation.
- 3.5 Instead, with a single housing market area, an appropriate spatial strategy could still be progressed by the Council – it is able to still focus development around the larger, higher tier settlements, as the Consultation currently proposes. This confirms it is not necessary to split the Borough between two housing areas to achieve a sustainable distribution of housing growth.
- 3.6 With a single housing market area, significant development is still required in the southern part of the Borough in respect of the Council's own housing needs.
- 3.7 In relation to any unmet need for housing required to be accommodated by the Council from other PfSH authorities, such development should be located where it is closest to meeting that need and consistent with the PfSH area within Test Valley (as defined by Figure 1 of the PfSH Spatial Position Statement, December 2023).
- 3.8 If the Council was to consider the greater dispersal of any unmet need from other PfSH authorities across the Borough (for instance in Stockbridge, which has little functional or geographical relationship with the PfSH area), even with a single housing market area, this would not be an appropriate or justified approach.

⁶ Paragraph: 055 Reference ID: 68-055-20240205

⁷ APP/C3105/W/23/3326761

4. Housing Supply

- 4.1 Against a minimum housing requirement of 11,000 homes and 43% split to STV, the Consultation identifies the need to plan for at least 4,730 homes in that southern area. Beyond existing completions and commitments in STV, notwithstanding CEG's objection to the principle of housing two housing market areas, the Consultation presents the need to allocate land to accommodate an additional supply of 1,644 dwellings, in order meet the residual requirement.
- 4.2 The largest allocation is that at Velmore Park for 1,070 dwellings, located adjacent to the urban area of Eastleigh on the eastern edge of Test Valley Borough. For Velmore Park, the Council's published Housing Trajectory (January 2024) considers that the first houses will be delivered in just three years following the adoption of the Local Plan on its currently timetable. This is highly ambitious given the scale of development and significant, uncosted infrastructure requirements⁸ including for highways improvements and ecological mitigation.
- 4.3 There also remains significant doubt over the timetable for delivery of strategic development (up to 1,100 dwellings) at Whitenap, Romsey (an allocation of the existing Local Plan) given current objections to the scheme from the Local Highway Authority, issues surrounding the minerals safeguarding of the site, and outstanding matters raised by Natural England in respect of impacts to European sites of the Solent and New Forest.
- 4.4 Other sites that the Council relies upon for housing in the southern part of Test Valley are also not considered deliverable or will not deliver as quickly as the Council contends. These include Romsey Brewery (the site is mothballed and necessary infrastructure outstanding), Ashfield Sawmill (there is no timeframe for the submission of reserved matters) and former North Hill Sawmill Yard (where an appeal is yet to be considered). In respect of the deliverability of other sites in the Council's supply, CEG reserves its position accordingly.
- 4.5 CEG objects to Consultation, including Policy SS6 (Meeting the Housing Requirements), as the Council is overly reliant on larger allocations that will not deliver homes as quickly as presented in the Housing Trajectory, as well as identified shortcomings on a range of other sites. At the very least, the Council should not rely on delivery of housing at Velmore Park and Whitenap until towards the end of the plan period and current trajectory. This is likely to present the need to identify less complicated sites that are of a smaller size and proven capable of delivering market and affordable homes to an expedient timetable, such as the Site at Rownhams Lane.

⁸ Infrastructure Delivery Plan, January 2024

5. Settlement Hierarchy

- 5.1 CEG raises objection to the proposed settlement hierarchy (Policy SS1) in respect of the unjustified elevated position of Chilworth as a Tier 2 settlement and failure to recognise the greater services / facilities accessible to Nursling & Rownhams.
- 5.2 CEG welcomes the more rational approach of the Consultation to defining the settlement hierarchy, with villages of 'Hurstbourne Tarrant and Ibthorpe', Shipton Bellinger, and Wellow to remain as Tier 3 settlements (i.e. 'Rural Villages', to use the same terminology as the current Local Plan), not elevated to Tier 2 settlements, compared to the previous Regulation 18 (Stage 1) consultation.
- 5.3 However, the Consultation maintains Chilworth as a Tier 2 settlement despite scoring significantly than lower in terms of 'key facilities' (score of 2) and 'other facilities' (score of 2) than any other Tier 2 settlement or indeed many Tier 3 settlements. The Council's Settlement Hierarchy Assessment seeks to justify the Tier 2 inclusion of Chilworth with regard to the nearby science park and proximity to Eastleigh, Chandler's Ford and Southampton. However, employment opportunities are not considered to compensate for a lack of shop, primary school, post office, takeaway and many other facilities (as should be found in a Tier 2 settlement); and facilities in these other larger settlements are beyond an accessible walking distance.
- 5.4 Consequently, for the emerging Local Plan to be justified and effective, Chilworth should be re-classified as a lower Tier 3 settlement.
- 5.5 For Nursling & Rownhams, the Settlement Hierarchy Assessment⁹ places weight on facilities and services within settlements located in an adjacent local authority area that local residents have access to and use. Lordshill is within cycling and walking distance of Nursling & Rownhams, with a significant range of additional facilities including a doctors' surgery and large health centre, dentists', pharmacy, large supermarket, indoor sports facilities (including swimming pool) and a café/restaurant. These facilities are not reflected in the scoring of Nursling & Rownhams and so understating its sustainable merits.
- 5.6 When these nearby facilities are fully taken into account, Nursling & Rownhams is then an outlier above many other Tier 2 settlements.
- 5.7 The sustainability of Nursling & Rownhams is further enhanced by its large areas of employment within the settlement boundary (as Strategic Employment Sites in the current Local Plan) providing very significant job opportunities.
- 5.8 The emerging Local Plan must recognise the greater sustainable merits of Nursling & Rownhams, set apart from many other Tier 2 settlements, and upgrade it to have its own position as a new tier between Tier 1 and Tier 2.

⁹ Paragraph 3.10, Settlement Hierarchy Assessment (2024)

6. Spatial Strategy

- 6.1 The preferred spatial strategy of the Consultation, to promote the regeneration of Andover and Romsey town centres, along with growth at other higher tier / larger settlements, is supported by CEG, generally recognised as capable of supporting a sustainable pattern and distribution of development.
- 6.2 The South of Romsey Town Centre Masterplan (August 2020), however, highlights that the opportunity for delivering significant residential growth on previously developed land in the highest tier settlement in the southern part of Test Valley is very limited, with few sites (even in the long term) identified.
- 6.3 Therefore, the need to accommodate the great majority of the Council's housing requirement through urban extensions to the more sustainable settlements remains justified, as recognised by paragraph 3.12 of the Consultation. Indeed the Framework (paragraph 74) affirms that greater numbers of new homes can often best be achieved through larger scale extensions to existing villages and towns.
- 6.4 In considering the distribution of development across the Tier 2 settlement in the southern part of Test Valley, the greater sustainable credentials of Nursling & Rownhams (where it is highly accessible to the wider urban area of Southampton and large areas of employment including Adanac Park and Nursling Estate) should be recognised. It should be considered ahead of Chilworth, North Baddesley and Stockbridge, consistent with representations above in respect of the settlement hierarchy.
- 6.5 For the spatial strategy to be considered appropriate, to enable to Consultation's objectives to be met, greater residential growth (more than just that proposed at Upton Lane of 80 dwellings) should therefore be accommodated on available and suitable land adjacent to the settlement edge of Nursling & Rownhams.

7. Development on Land at Rownhams Lane

- 7.1 The SHELAA recognises that residential development of approximately 300 dwellings is achievable on the Site, with the SA considering as well that significant development (of some 210 dwellings) could be accommodated. The Site is also located adjacent to the settlement boundary of the Tier 2 settlement of Nursling & Rownhams (following the proposed alteration to the urban area as depicted on the Proposals Map in order to include the now substantially completed adjacent development by Taylor Wimpey). The Consultation¹⁰ places Tier 2 settlements behind only the largest towns of Andover and Romsey, and recognises their suitability for the largest scale of strategic development
- 7.2 Consistent with a sustainable spatial strategy to deliver what the Council's housing should be, including to accommodate unmet needs from other PfSH authorities and to address the lack of affordable housing, the opportunity for residential development on the Site is reinforced by the Concept Masterplan at Appendix B.
- 7.3 The settlement of Nursling & Rownhams is considered by the Council to:

*have a broad range of facilities and are more sustainable than the more rural settlements in the Borough... Most are accessible to facilities and services in large neighbouring urban areas, such as Andover, Southampton, Eastleigh and Chandler's Ford. They have all the key facilities, good public transport links, and have a broad range of the other facilities which demonstrates their wider role in the local area.*¹¹

- 7.4 For the Site itself, the Concept Masterplan demonstrates a development that would:
- provide opportunities to delivery a mix of market and affordable dwellings in a range of sizes and designs across multiple character areas;
 - have a contiguous relationship with Nursling & Rownhams, connecting to the now substantially completed Taylor Wimpey scheme to the west;
 - include a new local community hub, providing the opportunity to provide a flexible retail and/or community uses, as well as sustainable travel options (including EV charging, cycle facilities) that would increase the number of accessible facilities to existing nearby residents as well those of future homes;
 - work with the existing planting and vegetation within the area by retaining key boundary tree planting, hedgerow and providing suitable offset from Lords Wood;
 - provide substantial areas of publicly accessible green infrastructure, including along Tanners Brook to the east and adjacent to the existing SANG to the north;
 - continue a widespread network of footpaths for public use and enjoyment, as well as opportunities to connect to Lords Wood to help facilitate the Forest Park proposals promoted by the Council;
 - be extremely well contained by natural landscape features and the M27 motorway to the north; and

¹⁰ Spatial Strategy Policy 1 (SS1): Settlement Hierarchy

¹¹ Table 3, Settlement Hierarchy Assessment (February 2024)

- maintain suitable buffers to the adjacent areas of ancient woodland, to safeguard / preserve its landscape and ecological value.

7.5 It is relevant too that development would be able to offset / mitigate any increase in nitrates through taking land out of agricultural use and/or other measures relating to the available land adjacent to Tanners Brook.

7.6 The Site is considered by the Council in the SHELAA, which recognises it is unconstrained in respect of any heritage assets, landscape designation, flood risk, tree preservation order, infrastructure / utilities or contamination.

7.7 Reinforcing this suitability are the findings of the appeal Inspector for the adjacent development to the west, which remain relevant for the Site (with reference to the paragraphs of the appeal decision APP/C1760/A/14/2224913):

- significant tree planting to the north of the access off Rownhams Lane would effectively screen the development in views from existing public highways (paragraph 32);
- tree planting along the northern edge of the housing development would provide screening in views from the public footpath (paragraph 32);
- from the M27 motorway, the housing development would be screened by significant tree planting and separated by the SANG – development would not be intrusive in views of the rural landscape (paragraph 33);
- tree planting around the SANG would attenuate noise from the motorway to a significant degree; and it is noted that existing housing in Rownhams is closer to the motorway (paragraph 38);
- buffer zones between the built development and Clam's Copse and Lord's Wood to maintain the woodlands' nature conservation status (paragraph 39).
- the bus stop on Horn's Drove is within easy walking distance (paragraph 42); and bus route 4, from this stop, connects to the central railway station in Southampton and other bus services at Lordshill, providing residents with frequent and nearby access to public transport (paragraph 43);
- Lordshill local centre, which is within walking distance of the development, includes a supermarket, medical centre, library, post office, public house and church, amongst other services. It is also within easy cycling distance (paragraph 44); and
- the development has no significant adverse impact on the visual amenity of the area, highway safety or local infrastructure. The site is a sustainable location for residential development (paragraph 47).

7.8 Overall, the Site, in a highly sustainable location, is available now and suitable to deliver a high quality residential development that would contribute to the vitality of Nursling & Rownhams as well as meeting the housing needs of the Council.

Sustainability Appraisal

7.9 The Site is included within the Council's SA, as part of considering its potential to be preferred for allocation in the Consultation. Overall, the Site scores well with greatly more positive or neutral scores than negative findings against the SA's objectives.

7.10 CEG, however, does not agree with the Council's scoring assessment for the Site, as against a number of objectives its sustainable credentials are inexplicably marked down. An alternative and better justified scoring is provided in the table at **Appendix C**, which identifies that the Site should score materially better including in respect of:

- **Objective 2 D)** – accessibility to Romsey: given the Site is within 680m of Routs Way bus stops, with a frequent service to Romsey and Southampton;
- **Objective 3 C) to 3 E)** – accessibility to a secondary school, convenience store and health care facilities: those services are available within Rownhams or at Lordshill;
- **Objective 8 C)** – potential to impact the separation between settlements: development would in no visual sense result in any coalescence between Nursling & Rownhams and Chilworth, with the Site separated by extensive areas of woodland and M27 motorway. The Site is not within a defined local gap;;
- **Objective 10 A)** – conservation of sensitive ecological sites: development would not have an adverse effect on protected ecological sites, with suitable buffer areas to be retained to areas of ancient woodland; SANG provision to ensure there would not be increased recreational pressure on the New Forest; measures to be taken to ensure Solent nutrient neutrality; and a net gain in biodiversity of at least 10% would be secured;
- **Objective 10 D)** – protection of trees: development would protect existing trees within the Site and across adjacent areas of woodland, as recognised by the SA;
- **Objective 11** – impact of climate change: with appropriate design measures and avoidance or mitigation in term sensitive ecology and flood risk, development on the Site should have no significant adverse impact on the causes or impacts of climate change;
- **Objective 12 D)** – noise pollution: with a sensitive layout of development on the Site, exposure to vehicle noise from the M27 motorway can be appropriately attenuated. The officers' report for the reserved matters of the adjacent Taylor Wimpey is relevant: *"that future occupiers of the proposed dwellings would not experience levels of noise that would adversely affect their amenities. The proposals are considered to comply with policy LHW4 of the RLP in this regard"*;

7.11 The SA concludes that *"overall habitats, ecology and flood risk constraints make this site inappropriate for residential development"* – a position that CEG strongly objects to for reasons presented above. With the reconsidered scoring of the Site against SA objectives, the Site is considered comparable if not more sustainable across a range of objectives against those sites in southern Test Valley currently preferred by the Council.

7.12 The scoring of the Site against the objectives in the SA, when compared to how the Council has considered the adjacent site of Fields Farm (reference 253), raises matters of consistency. For example, Fields Farm scores 'strongly positive' in terms of flood risk, compared to 'mixed' for the Site, despite the Concept Masterplan showing no development in more sensitive areas closest to Taner Brook; Fields Farm scores 'no effect' in terms of physical coalescence to neighbouring settlements, despite substantially reducing the gap to Southampton, compared to a negative score of the Site which has no relationship with Chilworth; and there is no reason why any ecological impacts of the Site should be scored lower than for Fields Farm. These inconsistencies demonstrate that the SA cannot fully be relied upon, as a justified evidence base, to inform the selection of the current draft allocations in the Consultation.

Overall

- 7.13 In respect of the significantly greater number of new homes the Council should be required to plan for, as well as concerns over the deliverability of the Consultation's current preferred supply, a high quality housing scheme on the Site is clearly demonstrated in this section above to be a sustainable alternative or additional site, that would help underpin a positive and justified approach to future growth across the Borough.

8. Conclusion

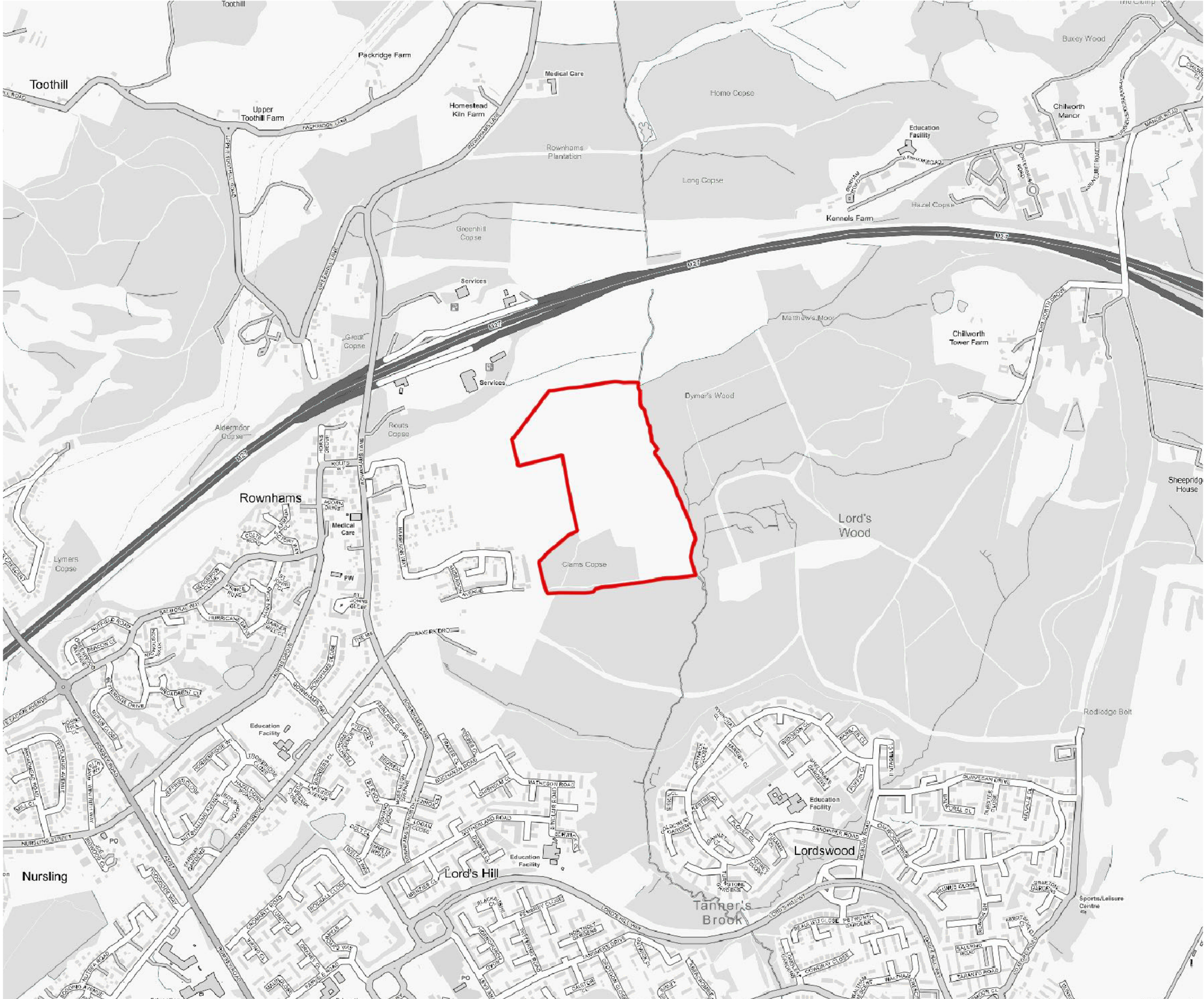
8.1 These representations respond to the Consultation and specifically in relation to how the Council should plan to meet its current and future housing need. It is presented that:

- the Council should work positively with other PfSH authorities so the draft Local Plan makes provision for an agreed apportionment of the significant unmet housing across that wider area. To simply avoid this issue, seeking that it only be addressed in a future review of the Local Plan, cannot be considered an appropriate or positive approach;
- the minimum level of local housing need does not address the greater requirement for affordable housing across Test Valley. Rather than taking a position of avoiding meeting the full affordable need because that may not be achievable, the Council should consider a more proportionate increase to its housing requirement, to still boost the supply of houses and make a meaningful enhanced contribution towards its affordable need;
- there should be a meaningful uplift in the supply of housing in areas closest to Southampton, to reflect the City's economic vibrancy and support economic growth and future prosperity (so to not unduly constrain the needs of business and employers);
- the plan period must be extended, to be compliant with national policy – requiring additional land for housing to be allocated;
- with the most recent changes to the Framework and Planning Practice Guidance, artificially dividing the Borough between two housing market areas is no longer justified (it is not necessary to achieve a sustainable distribution of development) and contrary to national policy;
- a single housing market area must not result in the greater dispersal of housing across the Borough from where it would most sustainably meet the needs of the Council and that other PfSH authorities are unable to meet;
- the Council remains reliant on larger allocations in the southern part of Test Valley that are unlikely to deliver houses quickly in the plan period. Instead, other or additional sites where delivery is proven and less complicated (such as the Site) should be allocated for development;
- Chilworth cannot be justified as a Tier 2 settlement, when objectively assessed against other settlements; whilst Nursling & Rownhams' outlier status, with accessibility to a greater range of facilities compared to many other Tier 2 settlements, should be reflected in the settlement hierarchy and spatial strategy;
- the SA inextricably under-scores the Site against a number of key objectives, an approach that is also inconsistent with how other sites have been considered; and
- in light of the above there is a clear need for the Council to identify additional land for housing development. Land at Rownhams Lane, Rownhams represents a suitable and deliverable site for residential purposes.

8.2 These issues raised represent a significant objection by CEG to the soundness of the emerging Local Plan as a whole.

- 8.3 Against these strategic concerns, in order for the draft Local Plan to satisfy the tests of soundness as well as the legal duty to cooperate, additional or alternative land for housing growth should be identified by the Council, which should include the Site, given its sustainable merits and proven deliverability.

Appendix A Site Plan



Site boundary

Notes/Revisions

Land at Rownhams
BSP and CEG



Location

Status:	Drawn by: JA	Checked by: IP
Project Number: 277904	Scale @ A3: 1:10000	Date: 28/03/2024
Drawing Number: TOR-SK002	Revision:	

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Appendix B Concept Masterplan

Rownhams

CONCEPT PLAN



1. Access would be achieved from the existing primary street through Broadleaf Park
2. North south landscape and wildlife protecting and enhancing the existing features
3. Opportunity to expand the SANG provision to the north, east and south and provide a wider circular walking network
4. Local green corridor can accommodate new planting linking the landscape spaces and provide space for trees and natural solar shading and provide pedestrian links to the public right of way.
5. The main land scape space will form part of a continuation to the green spaces through Broadleaf Park and enable recreational walking routes and form part of a wider play trail
6. Provision of children's play space, to be designed to complement the existing provision in Broadleaf Park
7. Drainage features will be considered as part of a comprehensive green and blue infrastructure design
8. New hedgerow planting will support new habitats and complement the existing landscape structure
9. Publically accessible landscape space with new recreational walking routes and habitat areas as part of an extended SANG network
10. Opportunity for mixed use element and mobility hub. This could include community space, nursery, and/or retail
11. Distinctive low density housing will provide a differing character in this southern housing parcel
12. New pedestrian access to Lords Wood

LAND USE		
	Residential	Total
	Primary street	6.1 ha
	Potential for mixed use	0.4 ha
	Informal open space	0.2 ha
	Homes @32.5dph	12.7 ha
	@35dph	200
	@37.5dph	215
		230

Appendix C SA Scoring

Land At Rownhams Lane – Site Appraisal				
Objective	Criteria	Council's Interim SA	CEG Scoring	Comments
Objective 1 – Meeting housing needs	A To address housing need	Uncertain	Strongly positive	Development would make a significant contribution towards meeting market and affordable housing needs
Objective 2 – Economic productivity	D Accessible to Romsey or Andover	Negative	Mixed	The Site is within 680m of Routs Way bus stops, with a frequent service to Romsey and Southampton
Objective 3 – Accessibility	C Access to secondary school	Negative	Mixed	The Site is within 680m of Routs Way bus stops, with a frequent service to Romsey and Southampton. There are secondary school, convenience store and health care facilities available within Rownhams or at Lordshill
	D Access to convenience store	Negative	Mixed	
	E Access to health care	Negative	Mixed	
Objective 8 – Landscape / settlement character	C Coalescence	Negative	No effect	Development would in no visual sense result in any coalescence between Nursling & Rownhams and Chilworth, with the Site separated by extensive areas of woodland and M27 motorway
Objective 10 – Biodiversity	A International sites	Strongly Negative	No effect	Development would not have an adverse effect on protected ecological sites, with suitable buffer areas to be retained to areas of ancient woodland; SANG provision to ensure there would not be increased recreational pressure on the New Forest; measures to be taken to ensure Solent nutrient neutrality; and a net gain in biodiversity of at least 10% would be secured
	D Trees	Negative	No effect	Development would protect existing trees within the Site and across adjacent areas of woodland
Objective 11 – Climate change	A Contribute towards reducing impact	Negative	No effect	With appropriate design measures and avoidance or mitigation in term sensitive ecology and flood risk, development on the Site should have no significant adverse impact on the causes or impacts of climate change
Objective 12 – Health & wellbeing	D Noise	Negative	No effect	With a sensitive layout of development on the Site, exposure to vehicle noise from the M27 motorway can be appropriately attenuated

Nexus Planning

