
Test Valley Borough Council – Draft Local Plan 2040: Regulation 18 Stage 2 (2024)

Broadlands Estate, Hampshire



Contents

1.	Introduction	1
2.	Regulation 18 Stage 2 (2024)	3
3.	Recommendations and Conclusions	8

1. Introduction

- 1.1. On behalf of Broadlands Estate ('the Estate'), Savills is responding to the Test Valley Borough Council (TVBC) 'Regulation 18 Stage 2' Consultation for the emerging Local Plan. This representation responds to the consultation, with a focus on the Estate's land interests in and around Romsey.
- 1.2. This representation should be read alongside those submitted by the Estate to the Council's Refined Issues and Options Consultation in September 2018.

Broadlands Estate

- 1.3. The Estate is the landowner of a wide range of properties and land within the town of Romsey and the surrounding area. The Estate is well placed to aid the Council in meeting the housing and employment needs of the Borough and has put forward a number of sites to TVBC through their various call for sites exercises (see Table 1).

Table 1: Broadlands SHELAA Sites (January 2024)

TVBC Ref	Site
150	Romsey Football Ground
151	Lee Manor Farm
152	Nursling Site, Lee Lane
153	Burnt Grove Field
154	Land south of Bypass Rd
155	Land at Burma Road
156	Land at Eastwood Court
157	Eastwood Court Buildings
158	Land at Pouncefoot Farm
160	Broadlands Home Farm
161	Longbridge Farm
162	Skidmore Barns
163	The Old Dairy
-	Bushylease Farm
-	Moorcourt Farm
-	Nightingale Wood
-	Squabb Wood

- 1.4. An Option Agreement between the Estate and Alfred Homes has been signed on Site 154 (Land South of Bypass Road). As such, a separate representation and visioning document has been prepared and

submitted for this particular site by Alfred Homes themselves. Likewise, a stand-alone representation has been prepared and submitted by Crest Nicholson in support of the ongoing strategic promotion of the Estate's land at Grove (Site 385 – Land at Upton Lane).

- 1.5. The representations submitted herein relate to the Estate's other land interests in the borough. Given the geographic scope and variance within the Estate's land ownership, the responses offered to the Council's consultation are made in broad terms and without prejudice to the future development of any of the Estate's land.

2. Regulation 18 Stage 2 (2024)

- 2.1. The Estate supports the Council in its preparation of the emerging Local Plan 2040 (LP40). The adoption of the Local Plan in due course will allow for well-planned and proportionate growth in the borough. The Estate's responses to the consultation exercise are set out below.
- 2.2. For ease of reference, comments are provided chapter by chapter.

Chapter 1: Introduction

Plan Period

- 2.3. The Estate is supportive of TVBC's strategic priorities and particularly highlight the importance of 'Prosperity' and the need to demonstrate economic growth, with positive outcomes for the local communities. TVBC acknowledges the importance of Romsey and Andover as the key market towns within the borough. The Local Plan's recognition of the borough's strong rural economy is welcomed and supported and the Estate believe that TVBC should use the LP to foster sustainable and proportionate growth within the borough's rural communities and market towns to help boost economic growth, and to tackle unemployment within the local communities.

Plan Period

- 2.4. TVBC adopted its Revised Local Plan DPD on 27 January 2016. The Revised Local Plan DPD sets out the long-term strategic plan for development within Test Valley Borough, and includes the strategic vision, objectives and the key policies needed to achieve sustainable development in Test Valley to 2029. The emerging Local Plan, is due to be adopted in Quarter 2 (April – June) 2026 (in accordance with the currently approved Local Development Scheme (LDS)). Paragraph 1.40 of the Reg 18 Stage 2 Draft Local Plan states that TVBC is committed to adopt the Plan earlier than that set out in the LDS. The new Local Plan will set out policies and guidance for development of the Borough over the next 15 years to 2040, and states in line with the minimum requirements set out in the National Planning Policy Framework ('NPPF') 2023.
- 2.5. The Estate considers that the plan period should be extended to 2042 to provide a more realistic adoption timescale and allow for any unexpected delays to adoption and sustain the policy requirement for a 15-year plan period as required by the NPPF.
- 2.6. If the Emerging Plan is adopted in late 2026, as projected by TVBC in its LDS, there will only be 14 years (April 2026 to 31 March 2040) following adoption. If, as seems more likely, the emerging Plan is not adopted until later in 2026 or even 2027, there will be potentially only 13 years of the plan period remaining. As such, the Estate considers that the plan period should be extended to at least 2042.

Chapter 2: 'Vision , Key Challenges and Objectives'

'Vision'

- 2.7. Overall, the Estate is supportive of the vision, in terms of recognising the key issues facing the District and

its prioritisation of providing access to good quality homes for all, delivering employment and supporting infrastructure, encouraging inclusive communities in sustainable locations, developing thriving town centres, and safeguarding the diverse natural built and cultural resources, whilst tackling climate change.

- 2.8. Development sites within the Estate's ownership can help to achieve the Council's aspirations by delivering residential and sustainable employment-led development in Romsey and the surrounding villages, that will meet a range of needs and aspirations.

'Communities'

- 2.9. Paragraphs 2.32-2.36 of the LP set out TVBC's ambitions to deliver and strengthen sustainable, cohesive and healthy communities in the borough's towns and villages. The Estate support the highlighted opportunity to strengthen and enhance the roles of both the borough's Market Towns and rural areas. Recognition of the benefits offered through sustainable population increase in regards to the vibrancy of rural communities is strongly supported.

'Housing'

- 2.10. The Local Plan states that LP40 will, 'provide a range of homes that are fit for purpose and designed to meet the needs and aspirations of different groups within the community, including a range of affordable housing and homes that meet the needs of an ageing population.' This aspiration is strongly supported by the Estate.
- 2.11. As noted by TVBC, providing a range of housing to meet the needs of our communities is a key challenge for the Local Plan 2040. Development sites within the Estate's ownership can help to address this challenge by delivering sustainably located and proportionately sized residential development in Romsey and the surrounding villages to meet local need.

'Economy, Prosperity and Skills'

- 2.12. The LP states on page 25 that one of the key objectives is to promote a vibrant and resilient local economy, providing a range of job opportunities and support a skilled and diverse workforce, so that local people can access learning opportunities and jobs and benefit from greater prosperity. This is supported by the Estate in the strongest possible terms.
- 2.13. The rural economy is a significant component of Test Valley's economic prosperity. Businesses located in the rural area of the Borough provide a significant contribution towards the economic success of Test Valley and the area is home to a large number of companies and jobs.
- 2.14. The delivery of employment land is crucial to the success of the emerging Local Plan, in that it must seek to meet the employment needs of the Borough and also support the level of proposed housing. The provision of sufficient employment space within the borough helps to minimise the travel distances that residents must travel in order to obtain employment. It also helps to boost the investment potential of the Borough. As such, it is agreed that TVBC should allocate sufficient land for employment use through the emerging Local Plan, to be supported by the evidence base currently being produced.

- 2.15. The number of small businesses operating in the Borough continues to grow significantly. As such, it is considered that the allocation of smaller employment sites, which are flexible in their use and are capable of meeting the needs of a variety of different businesses through flexible workspaces, is an ever important topic for the emerging Local Plan, perhaps even more so in the shadow of the COVID-19 pandemic in which access to local and flexible workspaces was shown to be incredibly valuable.
- 2.16. Allied to the above, agriculture and land based industries have a key impact on the character of the areas and how the borough's landscapes are managed. As part of the preparation of the Local Plan, the Council has stated that it will need to consider the best ways to conserve and where possible enhance the Borough's green infrastructure. As the Council is aware, the Estate owns and manages large tracts of land in the south of the borough and would be delighted to engage with the council at the appropriate time to discuss opportunities to deliver targeted green infrastructure improvements.

Chapter 3: Spatial Strategy

- 2.17. The Estate supports the primacy of Andover and Romsey in the proposed spatial strategy alongside the recognition of the borough's rural villages as viable development locations in Tier 3.
- 2.18. Whilst the Estate broadly supports the proposed overarching Spatial Strategy and settlement hierarchy set out in Spatial Strategy Policy 1 (SS1), the Spatial Strategy needs to take account of guidance in NPPF and policies elsewhere in the plan; acknowledging that for certain types of development, locations will not always follow the settlement hierarchy. Indeed, the NPPF highlights that plan making should enable the delivery of sustainable development and should positively seek opportunities to meet the development needs of the authority area. The emerging Local Plan is therefore an opportunity for TVBC to be more ambitious in its Spatial Strategy for the District.
- 2.19. For employment and logistics development in particular, a sustainable location requires good access to the strategic road network. Access to a workforce is also important which encourages locations close to centres of population in sustainable locations. Policy 1 SS1 needs to consider locations outside or beyond settlement boundaries where sustainable development is possible and should consider introducing additional flexibility to Tier 4 (countryside).
- 2.20. There are residual benefits that flow from getting development in the right place from the outset and directing growth to locations that benefit from existing infrastructure. Such locations that do not require significant investment in transport infrastructure are better able to deliver employment growth and sustainable population increase which in turn supports the vibrancy and resilience of the boroughs rural areas.
- 2.21. The Estate supports the provision of 'Rural Villages' (Tier 3) as a distinct category within the proposed Settlement Hierarchy. However, the Estate suggests that there is a gap between Tiers 3 and 4 that could usefully be filled in the next iteration of the emerging Local Plan. The current Plan fails to recognise the 'satellite' function performed by the smaller rural villages surrounding Romsey Town, whereby their respective proximity to Romsey allows the beneficial use of the services, amenities and onward travel opportunities offered by the adjacent larger settlement.
- 2.22. On first appraisal a 'Satellite Villages' category could include (inter alia):

- Lee
- Ashfield
- Abbotswood
- Embley
- Shootash.
- Woodington

2.23. The Estate are again reminded of NPPF Paragraph 83 which states that,

'housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.'

2.24. The proximity of these villages to Romsey makes them suitable locations for proportionate windfall development over and above the scale of development afforded to them as 'Countryside'. In line with paragraph 78, the Estate would support a more varied approach to the delivery of housing within the next iteration of the LP, recognising the not-insignificant contribution that community led and proportionate rural development can make to the Borough's housing needs, when sat alongside strategic scale developments.

2.25. The approach of drawing settlement boundaries around the urban edge of a settlement is well established. Where the growth of a settlement is required and planned for, such as in and around Romsey, the settlement boundary should be adjusted accordingly so that it can accommodate the level of planned growth across the plan period, allowing for windfall sites to come forward. As such, the next iteration of the emerging Local Plan should redefine the settlement boundary of Romsey and its satellite villages, to allow for proportionately sized future housing and employment sites to come forward, either through site allocations or via small windfall sites.

Chapter 4: 'Test Valley Communities'

Land South of the Bypass (Policy SA5)

2.26. The Estate supports the Draft Allocation of Land South of the Bypass as a strategic housing allocation

2.27. Detailed representations in support of this allocation have been submitted by Alfred Homes.

Land at Upton Lane, Nursling (Policy SA8)

2.28. The Estate supports the Draft Allocation of Land at Upton Lane as a strategic employment-led allocation. The site is suitably located to provide a sustainable development which would significantly contribute to the employment and housing need of STV.

2.29. Detailed representations in support of this allocation have been submitted by Crest Nicholson.

Chapter 5: 'Theme Based Policies'

Policy EC4: Tourism

- 2.30. Policy EC4 recognises that in order to sustain Test Valley as a visitor destination and to encourage long stay visitors, it is necessary to protect, but also enable further visitor accommodation. This is supported by the Estate in the strongest possible terms.
- 2.31. Policy EC4 states that proposals for rural tourism development will be permitted provided that (inter alia) it utilises existing tourist facilities and buildings and proposals within the countryside for extensions or new buildings should form part of an existing tourist facility. The Estate would consider this to be unduly restrictive and prohibitive of more innovative and sustainable tourism propositions.
- 2.32. To support the continued growth of the tourism sector within the Borough, particularly within rural locations, it is considered that the emerging Local Plan should consider making allocations for tourism uses, alongside smaller scale 'windfall' tourism developments that will help to promote the borough as a destination and support the local economy.
- 2.33. Above all else, the Estate requests that any adopted tourism policy is written to allow rural enterprises sufficient flexibility to change and adapt their business. Rural tourism is increasingly recognised as a successful means of diversifying agricultural and other land-based rural businesses. It would be unfortunate for the wording of the revised policy to unduly restrict and stifle any such innovation and diversification.

3. Recommendations and Conclusions

- 3.1. These representations have been submitted on behalf of Broadlands Estate in response to the Test Valley Borough Council 'Regulation 18 Stage 2 (2024)' consultation for the next Local Plan
- 3.2. As detailed in these representations, the Estate is the owner of a wide range of properties and land within and surrounding the town of Romsey. Accordingly, the Estate is well placed to aid the council in meeting the housing, employment and green infrastructure needs of the borough within the Southern HMA.
- 3.3. The Estate supports the Council in its preparation of the emerging Local Plan. The adoption of the Local Plan in due course will allow for well-planned and proportionate growth in the borough. The Estate would offer the following recommendations in respect of the form and content of the emerging Local Plan:
- In line with NPPF Paragraph 83, the Estate would support a more varied approach to the delivery of housing within the STV HMA in the next Local Plan, recognising the not-insignificant contribution that community led and proportionate rural development can make to the Borough's housing needs when sat alongside strategic scale developments.
 - The Estate suggests that there is a gap between the currently defined 'Rural Villages' and the smaller villages, simply classed as 'Countryside' that could usefully be filled in the emerging Local Plan by a 'Satellite Villages' category.
 - The next iteration of the Local Plan should redefine the settlement boundary of Romsey and its satellite villages, to allow for proportionately sized future housing and employment sites to come forward, either through site allocations or via small windfall sites.
 - To support the continued growth of the tourism sector within the Borough, particularly within rural locations, it is considered that the emerging Local Plan should consider making allocations for tourism uses alongside smaller scale 'windfall' tourism developments, that will help to promote the borough as a destination and support the local economy. Above all else, the Estate requests that any revised tourism policy is written to allow rural enterprises sufficient flexibility to change and adapt their business.
 - The allocation of employment land is crucial to the success of the emerging Local Plan, in that it must seek to meet the employment needs of the borough and also support the level of proposed housing. The allocation of small employment sites, which are flexible in their use and are capable of meeting the needs of a variety of different businesses through flexible workspaces, is an important topic for the emerging Local Plan.
 - As part of the preparation of the next stage of the Local Plan, the Council will need to consider the best ways to conserve and where possible enhance valued green infrastructure.
- 3.4. The sites submitted to the Council's Call for Sites exercise are suitable, available and can be achieved within the first five years of the Plan. As such, it is recommended that TVBC considers the allocation of these sites through its site selection processes.
- 3.5. Should the Council wish to obtain any further information on any of the land within the Estate's ownership, or to visit any of the sites included in the appendices, Savills would welcome the opportunity to discuss the matter with officers.

Jim Beavan
Associate Director

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Sarah Beuden
Director

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]