

**TVBC LOCAL PLAN REGULATION 18 PART 2 SUBMISSION on behalf of
Stratland Estates Ltd**

Retained land north of Oxlease Meadows, Romsey

Objections to:

SUSTAINABILITY APPRAISAL

POLICY SS1 Settlement hierarchy

POLICY SS6 Meeting the housing requirement

Proposals map

Paul Airey Planning

March 2024

Summary of objections

1. Sustainability Appraisal and Site Selection Process

- The assessment of the land on the land to the north of Oxlease Meadows (site 384) within the Sustainability Appraisal (SA) process is inaccurate in places and has not been based on all the relevant information available to TVBC. **Objection.**
- . The Sustainability Appraisal of the site has been unduly influenced by a 2023 appeal decision on the site. This was dismissed on the basis of specific landscape issues and did not conclude the site was unsuitable for development. It is anticipated that the site would be acceptable for a reduced number of houses. **Objection**
- The Sustainability Appraisal does not properly consider the pattern of development around the site and the logic of the development potential of the area being completed. **Objection.**
- The process of site selection in the local plan is not clearly described in the SA and cannot be justified. **Objection.**

2. Spatial Strategy

- Policy SS1 Settlement Hierarchy. The proposed settlement hierarchy is the cornerstone of TVBC's approach to delivering its spatial strategy

and sustainable development. Romsey is a Tier 1 settlement where the majority of development including strategic housing sites should be targeted. The failure to include the already fully developed areas at and around Oxlease Meadows within the defined settlement area is however inexplicable. These areas should be included within the defined settlement area rather than the designated countryside as they are fully developed and immediately adjacent to the existing settlement boundary. **Objection.**

3. Housing Distribution

- Policy SS6 Meeting the Housing Requirement. The delivery of the housing requirement in the LP relies upon a small number of large sites which is not consistent with the advice in the NPPF (2023) paragraph 70 in terms of providing a range and choice of sites. **Objection.**
- Policy SS6 Meeting the Housing Requirement. The Plan should be amended to include the land to the north of Oxlease Meadows, Romsey for housing. **Objection.**

4. Proposals Map.

- The omission of SHELAA 384 and the failure to show existing developed land around Oxlease as within the settlement boundary should be rectified. **Objection**

Background

Over the last 10 years the land around Oxlease Meadows has been developed as a result of a number of separate planning applications. The full picture of these developments is shown in Fig1 and Table 1.



Fig 1 Aerial context plan

- The Site
- Strategic Allocation Policy STV07.1 of the Local Plan (2006)
- Sites Permitted Contrary to COM2 of the Local Plan 2016

Ref	Name	Application Ref	Number of Dwellings
A	The pre-application Site	-	9
B	Plot 64	20/01959/FULLS	4
C	Oxlease Meadows	14/00204/OUTS	63
D	Granton	18/03223/FULLS	9
E	Land West of Cupernham Lane	16/01857/FULLS (appeal)	21
F	Ringstead	19/02698/FULLS	14
G	Oxlease House	21/02635/FULLS	35
H	Land West of Cupernham Lane	17/02183/OUTS	73
I	Land North of Woodpeckers	20/01045/FULLS	9
J	Wrens Corner	15/00679/OUTS	16
K	Land West of Cupernham Lane	17/00915/OUTS	5
L	Baroona	14/02265/OUTS	30
M	Magnolia Walk	12/00583/FULLS	32
N	Abbotswood	08/00475/OUTS	800
O	Abbotsford	16/03103/FULLS (appeal)	46
P	Ganger Farm	14/01090/FULLS	275

Table 1 Housing Developments

All of these planning approvals have been granted despite the fact that the land has been within the designated countryside and therefore technically contrary to policy

Com 2 of the current Local Plan. The land in question is immediately to the north of Fishlake Meadows in Romsey and to the west of the Abbottswood development which was a previous strategic housing site which is now fully developed.

The development sites around Oxlease Meadows have all been accepted to be sustainable sites for housing, with good access to the town centre, services and employment opportunities. It is considered that the new LP should recognise this by including the developed areas within the defined settlement area of the Tier 1 town of Romsey.

This would mean that the omission site SHELA 384 would be immediately adjacent to the existing developed area of Romsey, which in practical terms it is. The site forms the logical final piece in the jigsaw in this part of the town and there is no justifiable reason for not allocating it for development.

The site has been the subject of a planning application for 43 houses which was refused despite being recommended for approval by officers. This decision was subsequently appealed but this was dismissed by an Inspector. The reasons for the dismissal were however on relatively narrow grounds. Basically the Inspector considered that the proposed development represented an overdevelopment of the site which would impact unfavourably on the adjoining Fishlake Meadows SINC. As there was a demonstrable 5 year land supply the Inspector did not consider the benefits of providing the additional housing proposed outweighed the harm that would be imposed on views from the adjoining SINC and public footpath.

It is however completely wrong to assume that the Inspectors judgement in respect of a specific detailed planning application, should directly impact on the assessment of the suitability of the site for a site allocation in the Local Plan process. The issues considered by the Inspector are resolvable with a revised scheme, and the whole point of an allocation process is to consider which sites that would not previously be considered appropriate because of the policy position would make good development options.

To exclude a site from the allocation process because of a previous appeal decision is an entirely flawed approach. On this basis, the best possible site for future development in a local plan could be excluded solely due to its planning history. This is not a sustainable approach to the allocation process.

It is noted that the site appraisal conclusion is that SHELA 384 is a sustainable site with reasonable access to services and amenities in Romsey. As such it shows better credentials for allocation than some sites which have been selected as preferred options, such as land at Ganger Farm.

The omission of the site in the selected options is **objected** to.

Process of site appraisal.

The Site Appraisal process is not clearly explained in the SA. It is unclear for example whether the appraisal core data is as originally submitted by individual agents and landowners as part of the SHELAA process, or has been recalculated and checked by officers. Whichever the case, it is entirely unclear whether specifications and details about individual sites have been measured accurately or in a consistent way.

In respect of SHELAA 384 there are numerous errors apparent in the assessment and these are outlined below. Clearly if there are errors in this particular site, then it is likely that other sites will also have been inaccurately assessed and the validity of the whole assessment process must be in doubt. The SA process is **objected** to

It is considered that it would have been sensible for the LPA to let landowners, developers and agents have the opportunity to comment on the site appraisal process **before** sites were selected or rejected. This would have provided the opportunity to resolve discrepancies at an earlier stage, and would have given greater credibility to the assessment process.

Detailed comments on the site appraisal

Promoted housing capacity. The figure of 45 houses is incorrect. The refused application was for 43 units and the appeal decision makes it clear that a smaller number would be required for a suitable development.

An officer review of the potential site capacity should be carried out.

Objective 1 A commentary. The type of housing to be provided on individual sites is in the control of the LPA. This element of the SA should therefore be the same for all sites.

Objective 2 A commentary. No smaller sites will provide direct employment, therefore the response should be the same for all sites. Objective 2A commentary

Objective 3 G commentary. The site does have access to existing footpaths/cycleways and it is incorrect to state it is not connected to the network.

This section should be reviewed.

Objective 3 I commentary. It is incorrect to say that the site does not have access to the highway as there is access to both Cupernham Lane and Fishlake eadows.

This section should be reviewed.

Objective 6 A commentary. It is incorrect that part of the site is within Flood Zones 2 and 3. All of the developable site is within Flood Zone 1. This is shown in a recent FRA prepared for the site.

This section should be reviewed.

Objective 8 A commentary. The assumption that there would be a negative impact on landscape character is incorrect as a smaller development than originally planned would not impinge on the landscape character of the area as it would be largely hidden from view by existing and proposed vegetation.

This section should be reviewed

Objective 8 B commentary. The site does relate well to the existing settlement areas and is the logical 'final piece in the jigsaw'. It is considered the site would have primarily beneficial impacts on the existing settlement. The issue here is the failure of the LPA to recognise the surrounding development as part of the defined settlement.

This section should be reviewed

Objective 10 A commentary. A recent Ecological Impact assessment prepared for the site (Eco Support) demonstrates that development of the site would not detrimentally affect protected sites.

This section should be reviewed.

Objective 10 B commentary. A recent Ecological Impact assessment prepared for the site (Eco Support) demonstrates that development of the site would not detrimentally affect habitats, species and/or the local ecological network. The previous refused application did not generate any objection from the Ecology officer.

This section should be reviewed.

Objective 10 C commentary. A recent Ecological Impact assessment prepared for the site (Eco Support) and an Arboricultural Report by Barrell demonstrates that development of the site would not affect local green infrastructure including trees, green space, hedgerows or woodland. The previous refused application did not generate any objection from the Ecology officer

This section should be reviewed

Objective 10 C commentary A recent Arboricultural Report by Barrell demonstrates that development of the site would not lead to the loss of trees. The previous refused application did not generate any objection from the Trees officer

This section should be reviewed.

Objective 11 commentary. As a result of the above comments, this section should be reviewed.

Conclusion

The exclusion of the site on the basis of the recent appeal decision and the relationship of the site to the settlement is not justified. The site is in a sustainable location where other development has recently been approved and this site would complete development in this area. The surrounding development should in any case be designated as within the settlement boundary, and the site would therefore be on the edge of the Tier 1 settlement of Romsey and would display high performance scores equal to or above sites chosen for allocation.