

Test Valley Borough Council Consultation for Local Plan 2040 Regulation 18 Stage 2

COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 2 document for public consultation. This consultation document sets out a vision for Test Valley up to 2040, objectives for achieving this vision, our development needs alongside allocations for residential and employment development and theme-based policies.

The consultation period runs from Tuesday 6th February to noon on Tuesday 2nd April 2024. Please respond before the close of the consultation period so that your comments may be taken into account.

You can respond to our consultation by filling out the form below. This form has two parts:

Part A: Your Details

Part B: Your Comments (please fill in a separate sheet for each comment you wish to make)

Further information can be found on our website at:

www.testvalley.gov.uk/localplan2040

Once the form has been completed, please send to planningpolicy@testvalley.gov.uk below by **noon on Tuesday 2nd April 2024**.

Following receipt of your comments from, we will keep you informed of future consultation stages unless you advise us that you want to opt out of such communication.

If you are unable to send via email, please send a postal copy to our address below.

Contacting us

Planning Policy and Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ

Tel: 01264 368000

Website: www.testvalley.gov.uk/localplan2040

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

| | | | |
|--|----------------------------|----------------|-------|
| Title* Mr/Mrs/Miss/Ms/Dr/Other (please state) | Mr | First Name* | Lloyd |
| Surname* | Exley | | |
| Organisation* (If responding on behalf of an organisation) | EXL Project Management Ltd | | |

Please provide your email address below:

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| Email Address* | |
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Alternatively, if you don't have an email address please provide your postal address.

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| Address* | | | |
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| | | Postcode | |

If you are an agent or responding on behalf of another party, please give the name/ company/ organisation you are representing:

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| Draper Tools Ltd |
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Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/ postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment.

All representations and related documents will be held by the Council until the Local Plan 2040 is adopted and the Judicial Review period has closed and will then be securely destroyed.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are

available on our website here:
<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

Part B: Your Comments

Please use the boxes below to state your comments. This includes one box for general comments and another for specific comments related to an area of the Local Plan.

Insert any general comments you may have that do not relate to a specific paragraph number or policy in the general comments box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

General

Overall, Draper Tools Ltd (DTL) support the Employment and related Policies within the Draft Local Plan 2040. In particular, DTL support the principle of Policy SS8 (Strategic Employment Sites) and the inclusion of Test Valley Business Park, North Baddesley, within this Policy. They also support the principle of the new Employment allocation at Test Valley Business Park (Policy SA11).

As a major business, employer and commercial landlord within the region, DTL are experiencing high demand for land and buildings within Use Classes B2, B8 and E. This reflects a significant demand within the Test Valley and South Hampshire area and historic undersupply which can be addressed through the emerging Local Plan.

DTL therefore strongly recommend that Policies provide for flexibility in relation to new and existing Employment allocations. England has seen very significant changes since 2020 including impacts from Covid-19 and the Ukraine war, along with national changes in planning legislation such as the change in Planning Use Classes and the introduction of Class E uses. All of these and other changes have had very significant impacts on the demand for Employment space. Policy must maintain sufficient flexibility to respond to changing needs and demands. The priority should be to ensure a suitable supply of available land (as Policies SS8 and SA9 to SA12 set out) but thereafter to provide for a broad range of uses that could be accommodated subject to all necessary detail being satisfactory.

Policy SS8 includes the whole of the existing Test Valley Business Park. Policy wording must, therefore, acknowledge and provide for the range of uses that are permitted or may be sought in future. This includes expansion of the existing Draper Tools facility as has been permitted through various planning consents. It should also provide for Roman House and surrounding land which has the potential for intensification and diversification of uses. Where sites are in a mixed use – such as the existing Test Valley Business Park – Policy should not control or restrict changes between uses within acceptable Use Classes. Instead, Policy should allow and encourage flexibility to meet needs and demands as they emerge or change over the course of the Plan period.

The existing Business Park consists of (approximately):

- 8.75 HA Land Area
- 20,500m² of Class B8 Warehouse
- 1,260m² of Class E Office Space
- Circa 180 staff and employees

As demonstrated by the Reserved Matters consents for the site, there is capacity for the following additional development with no increase to the current allocation:

- 13,800m² of Class B8 Warehouse
- 2,500m² of Class E Floorspace
- Parking to accommodate all of the above

The site of Roman House (part of the Test Valley Business Park allocation) is an existing Employment site with a single existing building in Class E use. The existing concrete-framed building is somewhat unsightly and significantly under-utilises the site, most of which stands empty. The site represents an excellent opportunity for redevelopment and to meet Employment Needs of Test Valley South within an existing Employment area. It is essential that Policy supports future intensification and potentially redevelopment. Otherwise, the building may remain underutilised and unfit for changing future needs.

DTL support Policy SA11 within the context of this response..

Employment policies – whether relating to existing or new allocations – must not restrict to a range of uses or sub-uses unless there is exceptional need to do so. For instance, it would not be appropriate to restrict Class E uses to a sub-set of uses within Class E for a number of reasons:

- Those uses already exist on site or could be permitted under current Policy
- The definition of Use Classes may change in future
- Need or demand may change in the future, with over-restrictive Policy becoming a barrier to addressing future demand

For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible. Please use the box below.

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

| Paragraph Ref | Specific Comments |
|---------------|-------------------|
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What happens next?

All valid responses received within the consultation period will be acknowledged and you will be given a reference number. Please quote this reference number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent directly to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.