



**Representations to
Test Valley Borough Council
Draft Local Plan 2040 Consultation
March 2024**

On behalf of **Weston Air (Thruxton) Ltd/Thruxton Circuit Ltd**

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Registered Office: [REDACTED]
Office Address: [REDACTED]
T: [REDACTED] E: [REDACTED]




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	Name	Position	Signature	Date
Prepared by:	SS	Associate Director		28.03.2024
Reviewed by:	PN	Director		28.03.2024
Approved by:	PN	Director		28.03.2024
For and on behalf of Stantec UK Limited				

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1 Introduction

- 1.1 These representations have been prepared by Stantec on behalf of Weston Air (Thrupton) Ltd and Thrupton Circuit Limited in response to the Draft Local Plan 2040 Consultation.
- 1.2 Weston Air (Thrupton) Ltd is the current owner of Thrupton Aerodrome and surrounding land ('The Site') albeit are under contract to sell the Site to Thrupton Circuit Ltd. The extent of the Site is shown on the Site Plan enclosed as **Appendix 1**.
- 1.3 The Site is located to the north of the A303 and south of Snoddington Lane, west of the settlement of Thrupton. Thrupton is the nearest settlement to the west of Andover (c.7km away).
- 1.4 The Site comprises an aerodrome (operated under a CAA Ordinary Licence) and associated hangars for storage and air-related businesses, motor racing, skid pan, kart racing and industrial and recycling uses to the south. The industrial uses are provided in a collection of aging industrial building arranged in an ad hoc configuration, providing warehouse, office and industrial floorspace.
- 1.5 The Site currently accommodates over 30 separate businesses (within the industrial estate and airfield) and is the focus of economic activity in the local area, positively contributing to the local economy and employment opportunities. The Site also benefits from good access to the A303 and has few physical or environmental constraints. However, there is an absence of policy provision to support this important role and a historically restrictive policy framework that has contributed to a lack of investment over time and a consequential decline in the overall quality of infrastructure and facilities within the Site.
- 1.6 Against this context, the specific allocation of the Site (under Draft Policies NA9 and NA10) within the Draft Local Plan is very much welcomed and supported subject to minor adjustments as detailed within Sections 2, 3 and 4.
- 1.7 These comments build on representations previously submitted on behalf of Western Air (Thrupton) Ltd, a copy of which are enclosed as **Appendix 2**.

2 Response to the Draft Local Plan 2040

- 2.1 In this Section we set out our response to the detailed policy wording and supportive text of those policies which are of particular relevance, in the context of our Clients' objectives and aspirations.

Vision and Objectives

- 2.2 The Council's stated Vision is supported, in particular the need to deliver sufficient homes, employment and infrastructure required to meet the community's requirements and to support economic growth.
- 2.3 There is also recognition under the 'Economy, Prosperity and Skills' Objective to ensure that '*a varied supply of high-quality premises is provided in the right places with appropriate infrastructure*' and that there is an opportunity to '*build on the current strengths in the local economy and facilitate appropriate future levels of provision at the most suitable and sustainable locations*' (paragraph 2.62). **This is supported.**

Policy SS2 – Development in the Countryside

- 2.4 Draft Policy SS2 looks to carry over the Council's existing Policy COM2 which focuses development within the defined settlement boundaries and restricts development within the Countryside unless the criteria listed under Parts a) or b) are met. Part a) identifies other policies in the Plan which establish the acceptability of development within the countryside. This includes *inter alia* the following:
- **Policy EC1** (Retention of employment land and strategic employment sites) – the draft policy is aimed at protecting existing employment land and strategic employment sites and sets out criteria for proposals for alternative (non-employment) uses.
 - **Policy EC2** (Re-use of buildings in the Countryside) – the draft policy allows for existing buildings within the Countryside to be re-used for either commercial or residential use provided the relevant criteria are met.
 - **Policy EC3** (Rural diversification and employment sites in the Countryside) – the draft policy allows for the redevelopment of existing employment buildings within the Countryside but subject to criteria including *inter alia* part a) which requires the development to be 'contained within the lawful employment site'; and part b) which requires there to be a demonstrable need for the proposed employment development.
 - **Policy EC4** (Tourism) – the draft policy permits development for tourist development and accommodation within the Countryside where it utilises an existing building.
- 2.5 As currently worded, neither Policy SS2 nor any of the 'exception' policies outlined above and within the policy acknowledge the proposed allocation of Thruxton Aerodrome for employment use (under Draft Policies NA9 and NA10). This results in an inherent contradiction between policies SS2 and policies NA9 and NA10 whereby policies NA9 and NA10 allocate land for development (beyond a defined settlement boundary) and policy SS2 seeks to restrict development in such locations (i.e. the countryside). It is therefore imperative that this conflict is rectified so that the plan is consistent and provides clear guidance to potential developers.
- 2.6 **We therefore duly request that Policies NA9 and NA10 are explicitly referenced within Policy SS2 under part a) of the policy. Alternatively, the land covered by policies NA9 and NA10 should be removed from the countryside designation.**

Policy SS7 (Employment Land Requirement)

- 2.7 Draft Policy SS7 sets out the employment land requirements for the Borough over the period 2020 to 2040. Acknowledging that there are two functional economic market areas operating with the Borough, the requirements have been split between Northern and Southern Test Valley. Within Northern Test Valley, there is an identified minimum requirement of 31.3ha employment land. Such an approach is sensible as it doesn't preclude additional land (over and above the minimum of 31.3ha) coming forward for development and builds in an important element of flexibility to accommodate needs not currently anticipated (in line with Paragraph 86 of the NPPF). It is important to recognise that the employment land figures quoted are not ceilings and as the Council acknowledge within the supporting text (paragraph 3.115) there is a need to take a *'flexible and pragmatic approach'* to the delivery of new employment floorspace across the Borough. **Such an approach is supported.**
- 2.8 The identified employment land requirements have been informed by the Test Valley Employment Needs Further Analysis Study (DLP) (2022) which is preferred by the Council over the 2021 PfSH Assessment as it provides a finer grain of analysis, specific to the Borough. **We have no objection to this approach.**

Policy SS8 (Meeting Employment Land Requirements)

- 2.9 The Council's proposed approach to meeting the minimum employment land requirements set out under draft Policy SS7 is to seek to focus development for employment uses within existing Strategic Employment Sites and proposed new Strategic Allocations as listed under draft Policy SS8.
- 2.10 Within Northern Test Valley, 'Land South of Thruxton Aerodrome, Thruxton' is identified as a Strategic Allocation, where development for employment uses will be supported. **This is welcomed and supported.**
- 2.11 The supporting text acknowledges that the Site has been allocated against the context of there being no surplus need (over and above existing supply) within Northern Test Valley. However, the NPPF (paragraph 86) requires policies to positively and proactively encourage sustainable economic growth, and to build in flexibility to accommodate needs not anticipated in the Plan, and as such, this is considered a sound and robust approach.
- 2.12 Where there is an identified opportunity (as in this case), the Council have given due consideration as to whether and how this might positively contribute towards the overall economic growth strategy over the plan period. Indeed, the Sustainability Appraisal (February 2024) notes that the *'allocation of the site through the Local Plan provides the opportunity to maximise the potential of an existing strategic business park and provides a unique opportunity to support existing uses associated with the Aerodrome which aligns with the need for employment uses identified in the DLP employment study (2023)'* (paragraph 1.60). Paragraph 1.60 goes on to state:
- 'The Thruxton Industrial Estate provides an opportunity to deliver a strategic scale allocation on an existing business park that can support a range of key sectors including motorsport, aviation, and advanced engineering / manufacturing. The 15ha site also provide a strategic scale allocation providing for local market needs over the plan period'.*
- 2.13 **On the basis that the proposed allocation is supported by the evidence base, accords with the objectives of the NPPF (paragraph 86) and is deliverable within the Plan period, the Council's approach is considered to be positively prepared, justified, effective, consistent with National Policy and therefore sound.**

Policy NA9 (South of Thrupton Aerodrome)

- 2.14 Linked to the Strategic Allocation identified in Draft Policy SS8, Draft Policy NA9 provides a specific policy to manage development on land identified as 'South of Thrupton Aerodrome' which comprises c.15ha and is identified within Figure 4.10 and as the land shaded blue on Draft Inset Map 47.
- 2.15 The inclusion of a site-specific policy which provides in principle support for development of this part of the Site is supported. Notwithstanding this, we duly request some adjustments to the detailed policy working and that of the supporting text. This is set out in detail within Section 3.

Policy NA10 (Thrupton Aerodrome, Thrupton)

- 2.16 Draft Policy NA10 relates to the wider Site (outwith the Strategic Allocation) as identified on Figure 4.11 and as the land within the orange line on Draft Inset Map 47. The Policy introduces a positive planning framework to facilitate appropriate development within the existing aerodrome which has been absent in previous adopted Local Plans. This proposed policy is critical to facilitating enhancement of existing facilities serving the airfield and racing circuit which are increasingly outdated, as well as to supporting additional development aimed at supporting and safeguarding the existing role and function of these uses.
- 2.17 The inclusion of a site-specific policy which provides in principle support for appropriate development on this part of the Site is supported. Notwithstanding this, we duly request some adjustments to the detailed policy working and that of the supporting text. This is set out in detail within Section 4.

Policy CL3 (Sustainable Buildings and Energy Use)

- 2.18 The thrust of Draft Policy CL3 is generally supported. However, as a general observation and in our experience, it is highly challenging for non-residential development below 1,000 sqm to achieve BREAAAM 'Excellent'. Such buildings are usually of simple construction which reduces the scope of applicable credits and increases the risk of overdesign / overengineering for compliance sake. **We would therefore urge the Council to consider amending the proposed threshold of '500 sqm' to '1,000 sqm' for all new non-residential development. The policy should also include the caveat which allows an application to demonstrate that the requirement may not be technically or financially viable (as per Draft Policy CL4).**

Policy CL4 (Water Use and Management)

- 2.19 Consistent with our comments in relation to Draft Policy CL3, we would urge the Council to reconsider amending the proposed threshold of '500 sqm' to '1,000 sqm' for all new non-residential development. Notwithstanding this, we support the provision within Draft Policy CL4 which allows an application to demonstrate that the requirements may not be technically feasible or financially viable (which is absent within Policy CL3).

Policy EC1 (Retention of Employment Land and Strategic Employment Sites)

- 2.20 Draft Policy EC1 is geared towards the retention of employment land and lists criteria relevant to an application seeking to control alternative uses from coming forward. Whilst this makes sense for existing employment land, the policy also applies to 'allocated employment sites' (which may or may not be within existing employment use). In this regard, the Policy would benefit from additional criteria which acknowledges the potential for non-employment or ancillary uses to come forward on allocated employment sites where justified.

3 Requested Amendments to Policy NA9

- 3.1 In this section we set out below our requested changes to the wording of Policy NA9 and the accompanying supportive text (proposed changes shown in **Bold**).
- 3.2 Whilst the site-specific allocation is supported, it is important that the existing Site conditions are recognised, and that the policy is framed to provide the best opportunity for the Site to come forward for development and deliver the anticipated benefits.
- 3.3 Approximately half (circa 7 hectares) of the allocated Site is currently developed for low density employment generating uses. Most of the buildings are dated and there is a pressing need for these to be redeveloped to provide modern, fit for purpose accommodation. Importantly, none of the existing buildings are restricted (via planning conditions) to aviation or motor linked industries. They operate under general employment (E(g)(ii-iii), B2 and B8) planning permissions and it is important that this flexibility is retained in any redevelopment proposals and therefore the policy wording.
- 3.4 It is accepted, that beyond the existing built form of the business park that a more restrictive policy approach can be justified based on the Council employment evidence base. There is however a need to introduce a level of flexibility to beyond solely aviation and motor based industries in order to compliment the redevelopment of the wider site, provide a positive framework for the redevelopment of the Site, and also to align with the Council's evidence base findings.
- 3.5 It is also important to acknowledge that any redevelopment proposal is brought forward in a comprehensive manner in order to fully understand the implications, impacts and benefits of the proposal. In practice it is likely that any proposal will be brought forward by a single outline application that would be supported by a set of parameter plans (controlling use, quantum, access, height etc) and an illustrative masterplan demonstrating how the Site could be delivered. This would allow the Council to fully understand the proposal and its implications and introduce controls on certain elements or areas of the Site (where justified). It will also ensure that the Site will come forward on a comprehensive and cogent basis.
- 3.6 In light of these key principles, we promote the following amendments.

Policy NA9

A strategic employment allocation of approximately 15 hectares is proposed at South of Thrupton Aerodrome (**as defined on the Proposals Map**). ~~Development will need to achieve a positive relationship with the Thrupton Aerodrome Site.~~

Redevelopment of the existing business park (circa 7 hectares) for Employment uses comprising offices (E(g)(i), Research and Development (E(g)(ii), Industrial Processes (E(g)(iii), General Industrial (B2), Storage and Distribution and Open Storage (B8), and support facilities will be permitted.

On the remainder of the Site (circa 8 hectares) ~~D~~development for employment uses will be permitted subject to:

- a) The use ~~comprises~~ **comprising** a business activity which is related to either aviation, or to motor sport or the motor industry, ~~and/or~~ **and** has a connection to ~~the~~ **the** use or operation of the airfield, or motor racing circuit; **or**
- b) **The use comprising a business activity which is related to advanced manufacturing, knowledge based, creative, or high technology industries.**

- c) Where **complementary** non-employment uses are proposed, these will primarily support onsite businesses and their employees **or visitors to the aerodrome and motor racing circuit.**
- d) ~~A sequential approach will be taken within the site to direct d~~Development **should be directed** to areas at lowest risk of flooding taking into account flood risk from all sources including surface water flooding.
- e) ~~Access via~~ All development should be accessed/serviced using the existing access ~~from business park at~~ Aerodrome Road;
- f) Development should not impact the safe and efficient operation of the airfield or motor racing circuit.

Any planning application should be supported by an illustrative site-wide masterplan.

Supportive Text (starting at paragraph 4.111)

4.111 ~~This site combined with the level of committed employment supply, does exceed the Northern Test Valley employment requirement. The benefits and unique opportunity presented by allocating at Land South of Thrupton Aerodrome justify exceeding the employment requirement.~~ The NPPF encourages planning policies to set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth; to identify strategic sites, for local and inward investment to match the strategy; and be flexible enough to accommodate needs not anticipated in the Plan. A unique opportunity has been identified at Thrupton which has potential to deliver significant economic benefits (including through the provision of choice and competition) which justifies the allocation of Land South of Thrupton Aerodrome.

4.112 Alongside the proposed strategic employment site allocation, a policy is set out to support the employment role of the Thrupton Aerodrome. ~~The criteria-based policy supports the re-development of existing employment uses and will enable the site to redeveloped existing units on site.~~ National policy supports this approach as it will enable businesses at the Aerodrome to expand and adapt and enable Thrupton Aerodrome to build on its existing strengths in motor and aviation industries.

Land South of Thrupton Aerodrome

4.113 Thrupton Business Park is an established employment site located south of Thrupton Aerodrome and west of Thrupton Village. The site is adjacent to ~~this and~~ the A303 which provides good connectivity to Andover and the wider strategic road network.

4.114 The site comprises some existing employment development (**circa 7 hectares**) and there is an opportunity for comprehensive development of the site to establish a high-quality business park. The site has the potential to deliver approximately 15ha (60,000sqm floorspace) of employment development over the Local Plan period.

4.115 The site is adjacent to the Thrupton Aerodrome which includes employment uses relating to aviation, motorsport, advanced manufacturing, and knowledge-based industries. The master planning approach for the Thrupton Business Park will seek to enhance the relationship with the aerodrome site.

4.116 Employment uses related to aviation, motorsport, advanced manufacturing, and knowledge-based uses will be supported which includes the following use classes (E(g)(i), Research and Development (E(g)(ii), Industrial Processes (E(g) (iii), General Industrial (B2) and Storage and Distribution and open storage (B8). The site also has

potential to support some ancillary uses to support the main employment function including non-employment facilities to support on site businesses, ~~and employees, and visitors to the Aerodrome.~~

- 4.117 The site is adjacent to Thruxton Village where there is a 'Made' Neighbourhood Plan 2020-2029 in place. The Neighbourhood Plan a specific policy relating to Thruxton Aerodrome and the industrial estate (EC1 Thruxton Airfield). The policy sets out that commercial proposals will support the motor industry and aviation related uses. Commercial proposals will also deliver multiple benefits to the airfield, parish and local environment. The Local plan policy is consistent with the made policies of the Thruxton Neighbourhood Plan.
- 4.118 The existing site access off Aerodrome Road is proposed to provide the site access and ~~may will~~ require improvements. ~~There is potential need for offsite junction improvements which may include the slip road access to the A303.~~
- 4.119 ~~A limited area of land within the site on the northern boundary includes part of a former landfill site. Further investigation is required to determine appropriate mitigation measures.~~
- 4.120 There are small areas within the site affected by flood zones 2, 3 and surface water flooding. ~~A sequential approach will be taken within the site to direct~~
~~dDevelopment should be directed~~ to areas at lowest risk of flooding ~~within the Site.~~

4 Requested Amendments to Policy NA10

- 4.1 In this section we set out below our requested changes to the wording of Policy NA10 and the accompanying supportive text (proposed changes shown in **Bold**).
- 4.2 Whilst the site-specific allocation is supported, we believe that it would benefit from some minor amendments in order to provide greater clarity in relation to the location of new development.

Policy NA10

Development for Employment uses comprising **primarily** offices (E(g)(i), Research and Development (E(g)(ii), Industrial Processes (E(g) (iii), General Industrial (B2) and Storage and Distribution and open storage (B8); and support facilities will be permitted within the Thrupton Aerodrome site, provided that:

- a) The use comprises a business activity which is related to either aviation, or to motor sport or the motor industry, **and/or** has a connection to **the** use or operation of the airfield, or motor racing circuit;
- b) Where **complimentary** non-employment uses are proposed, these will primarily support onsite businesses, **and** their employees or visitors to the aerodrome and motor racing circuit **or the operation of the aerodrome or motor racing circuit**;
- c) **New Development is primarily related to the redevelopment and extension of existing buildings shall primarily be** located within the **eastern western** part of the site **within or in proximity to the existing building cluster and accessed** off Aerodrome Road;
- d) Development **would should** not impact upon the safe and efficient operation of the airfield or motor racing circuit;
- e) The layout and form of development **will shall** avoid significant adverse impacts on the areas of higher landscape sensitivity to the north of the site and the setting of the Thrupton Conservation Area, listed buildings and Scheduled Ancient Monument **to the east; and**
- ~~f) Main vehicular access via existing aerodrome access at Aerodrome Road; and~~
- f) **Any appropriate** improvements **shall be are** made to the transport network to manage impact, including junction improvements and/or financial contributions **as required appropriate and where they are justified**.

Supportive Text (starting at paragraph 4.123)

- 4.123 Thrupton Aerodrome has developed into a centre for motor sports alongside aviation, and there are a number of businesses operating on the site. This policy seeks to support and facilitate the continued focus of **the** site as a centre for the aeronautical and motor sports industries.
- 4.124 Supporting Thrupton Aerodrome site to adapt and redevelop in line with its existing employment uses is in accordance with national policy. The NPPF states planning policies should recognise and address the specific locational requirements of different sectors, including making provision for clusters or networks of knowledge and data-driven, creative or high technology industries.
- 4.125 The retention of Thrupton Aerodrome as a centre for activities relates to either aviation, or to motor sport or the motor industry. This also include activities or supporting facilities that have a connection to these uses or operation of the airfield, or motor racing circuit.

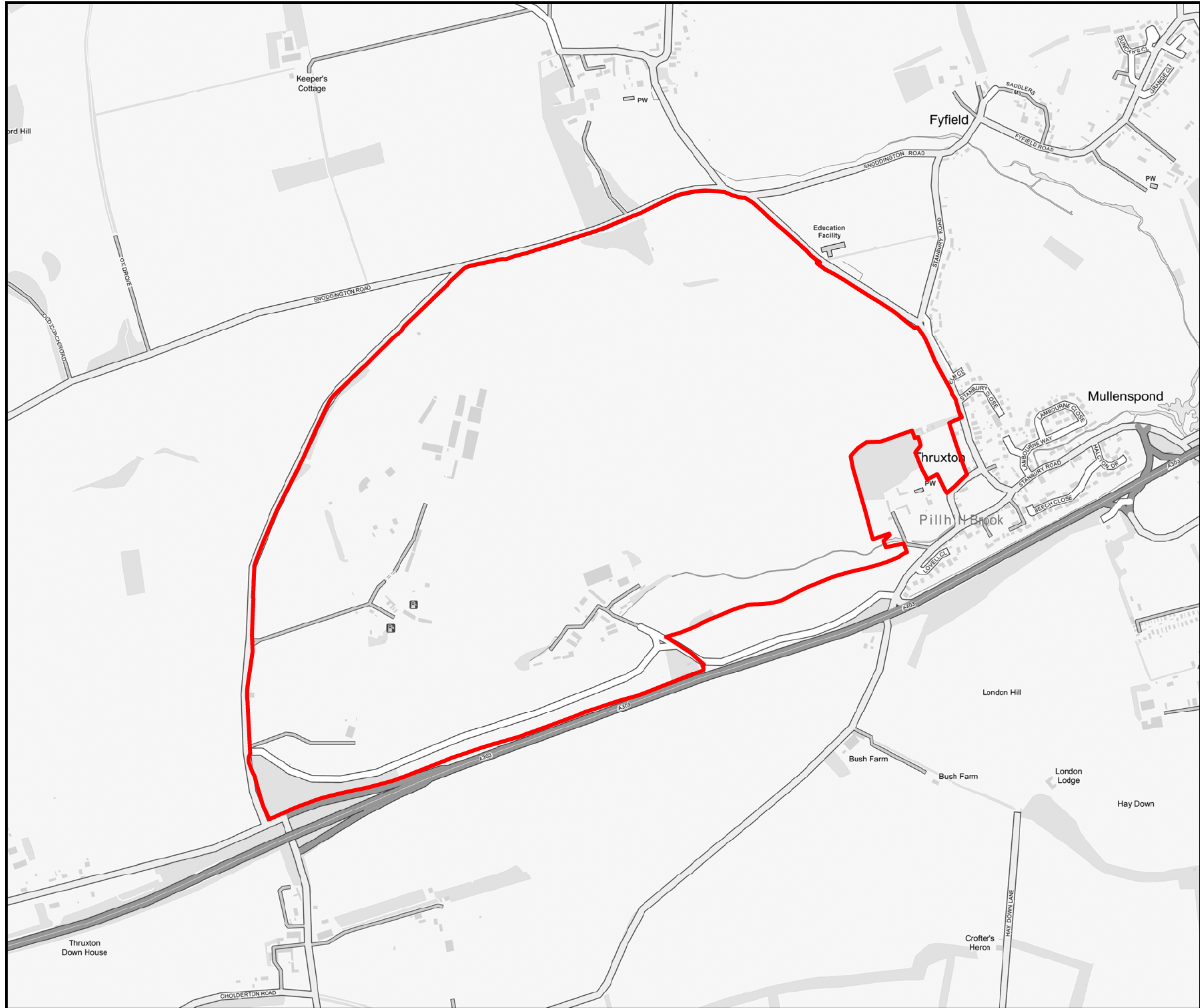
- 4.126 Development/~~redevelopment~~ should be primarily ~~related to the redevelopment and extension of existing buildings focussed~~ within the ~~eastern~~ **western** part of the site **(within or in proximity to the existing building cluster)** and should not impact upon the continued safe and efficient operation of the airfield or motor racing circuit.

5 Summary

- 5.1 Western Air (Thruxton) Ltd and Thruxton Circuit Ltd strongly welcome the allocation of land at Thruxton Aerodrome and the introduction of site-specific policies which recognise and support the important role that the Site currently plays as well as the potential opportunity for the Site to enhance its contribution through appropriate new development.
- 5.2 In order to ensure the policies within the Local Plan continue to support the unique opportunities identified at Thruxton and supported by the evidence base, and for the purposes of clarity we have requested some amendments to the policy wording of Draft Policies (and supporting text) NA9 and NA10 specifically (with Sections 3 and 4 respectively), alongside more general suggested changes to other policies outlined in Section 2.
- 5.3 We would duly request that the Council gives further consideration to these proposed changes. We would also welcome further positive dialogue with Officers moving forwards.

APPENDIX 1

Site Location Plan



The scaling of this drawing cannot be assured

Revision	Date	Dm	Ckd
-	-	-	-

LEGEND

 Site Boundary



Project
Thruxton Airfield
Western Air (Thruxton) Ltd

Drawing Title
Site Location Plan

Date 25.08.2020	Scale 1:10,000 @A3	Drawn by ML	Check by PN
Project No 32117	Drawing No LN-P-01	Revision -	



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APPENDIX 2

Previous Representations

**TEST VALLEY DRAFT LOCAL PLAN 2040
REGULATION 18 CONSULTATION – STAGE 1 AND CALL FOR SITES
REPRESENTATIONS ON BEHALF OF WESTERN AIR (THRUXTON) LTD**

1. We act on behalf of Western Air (Thrupton) Ltd and have been instructed to submit representations in relation to the Test Valley Local Plan 2040 Regulation 18 Consultation – Stage 1. Also enclosed as part of these representations are four Call for Sites submissions (**Appendix 1-4**).

Background and Site Context

2. Western Air (Thrupton) Ltd own and operate Thrupton Aerodrome ('the Site') and surrounding land. The c.181ha Site is located to the north of the A303 and south of Snoddington Road, west of the settlement of Thrupton. Thrupton is the nearest settlement west of Andover, approximately 5 miles away.
3. The Site comprises an aerodrome (operated under an CAA Ordinary Licence) and associated modern hangars for storage and air related businesses, motor racing, skid pan, kart racing and industrial and recycling uses to the south. A collection of ageing industrial buildings arranged in an ad hoc configuration also provide warehouse, office and industrial floorspace.
4. The Site currently accommodates over 30 separate businesses (on the industrial estate and airfield) and is the focus of economic activity in the local area, positively contributing to the local economy and employment opportunities. The Site has easy access to the A303 and has few physical or environmental constraints.
5. Despite this, the Site is not currently identified or even acknowledged within the adopted Local Plan (2016) and there is therefore no policy provision which seeks to support or protect the Site's important role moving forwards, specifically in terms of its aeronautical and motorsport functions but also as a key local employer. Many of the existing buildings on the Site are old and in an increasingly dilapidated condition which has resulted in some tenants opting to relocate their operations to more suitable accommodation elsewhere. The current position is not therefore sustainable and the Site is in desperate need of inward investment to ensure the long-term viability of its various, interlinking operations.
6. It is therefore critical for the emerging Local Plan 2040 to properly recognise the Site both in terms of its current contribution but also in terms of its potential to accommodate additional,

development which will serve to bolster its existing role and ensure the longer-term viability of what is otherwise a declining site.

Previous Representations

7. Representations have previously been submitted to the Council on the Issues and Options draft Plan (in September 2018) seeking a more permissive policy position particularly in relation to the industrial estate part of the Site and land along the southern boundary which is well screened from the surrounding area. Further representations were submitted to the refined Issues and Options Plan (in August 2020) which sought to promote the Site in a more holistic manner, aimed at securing the long-term future of the Site and maximising the economic and community benefits it could deliver over the emerging Local Plan period. A copy of previous representations is enclosed at **Appendix 5**.
8. In line with our previous representations the Site remains in critical need of inward investment to secure and protect its long-term future. This necessitates a more permissive policy approach across the Site as a whole which would ensure that where required, measures can be taken to maintain strict safety standards and ensure a sufficient quality of infrastructure is provided to serve the airfield and racetrack operations in particular.

Response to the Stage 1 Consultation

9. We set out below our formal comments on the current Stage 1 Consultation, utilising the Council's headings for ease of reference.

Vision and Objectives

10. The stated Vision seeks to support a skilled and diverse workforce so that local people can access learning opportunities and jobs and benefit from greater prosperity. TVBC identify that to support economic sustainability in the local and sub-regional economy, it is important that employment land, including a varied supply of high-quality premises is provided. The draft Plan identifies an opportunity to build on current strengths in the local economy and facilitate appropriate future levels of provision at the most suitable and sustainable locations.
11. Thruxton represents an existing key employment site in an accessible location which has potential to enhance its overall contribution to the local economy. It should therefore be given due deliberation by the Council in the consideration of sites for meeting identified employment needs over the plan period (to be set out in Stage 2 of the Regulation Consultation). To this end, the southern part of the Site has been put forward as part of the accompanying Call for Sites submission for its potential to accommodate additional employment floorspace.

Spatial Strategy

12. The Spatial Strategy sets out at a high level, direction on where and what type of development will be supported. The strategy focuses on a settlement hierarchy which identifies the sustainability and role of settlements by grouping settlements by tiers (Thruxton being Tier 4 – the lowest of the recognised settlements).
13. The ranking of each settlement in the hierarchy does not indicate whether there is suitable land for development in that location, or that environmentally it would be appropriate.

14. Although the Settlement Hierarchy is a useful policy tool to deliver the spatial strategy, this may not be appropriate for all types of development, such as employment uses, and we encourage an approach whereby the hierarchy is not rigidly adhered to in determining levels of growth, and instead, should explore opportunities through site allocations to deliver a comprehensive strategy with the support of landowners.
15. As noted above, we understand that the Stage 2 Regulation 18 consultation will include draft site allocations which will draw on sites included within the Strategic Housing and Economic Land Availability Assessment (SHELAA) in the first instance. Accordingly, the Site has been submitted to the SHELAA Call for Sites, alongside these representations.

Meeting our Needs

16. In relation to the economy, it is stated that the Local Plan 2040 will continue to support economic growth and aim to set out anticipated employment needs and their approach to meeting these needs. With reference to Paragraph 82 a) of the NPPF (2021) which encourages planning policies to "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth" (our emphasis), it will be important for the emerging Local Plan to consider all reasonable alternatives for meeting the identified needs of the Borough in a sustainable manner.
17. The Economic, Employment and Commercial Needs Study (March 2021) undertaken by the Partnership for South Hampshire (PfSH) (the 'PfSH Report'), identifies a requirement for 23,538 sqm Class E(g)(i)-(ii) floorspace and 311,195 sqm Class E(g)(iii)/B2/B8 floorspace in north Test Valley over the period 2019-2040. This equates to a significant 81.7ha of employment land required to meet demands in the north of the Borough alone (a need for a further 55.4ha of employment land is identified for south Test Valley).
18. We note that the Council question (at paragraph 5.55) the appropriateness of the methodology underpinning the PfSH Report and that further assessment of employment need will be undertaken which will necessarily include an assessment of sites with potential to contribute towards meeting the Borough's economic needs. We would reiterate at this point that land at Thruxton (specifically land along the southern boundary) is both available and suitable to accommodate additional employment floorspace in an accessible location and which would make a significant contribution towards meeting the Borough's economic needs over the plan period.
19. As the emerging Local Plan moves forward to Stage 2, the Site should therefore be identified as a key existing employment site with potential for further development which would optimise the Site's contribution to the job market and employment offer in this part of the Borough. This would build on the current uses whilst recognising an appropriate amount of flexibility moving forward to allow for businesses to invest, expand, and adapt – this is critical to preserving the Site's existing role and function which is otherwise expected to continue on a downward trajectory of decline.

The Economy and Housing

20. The relationship between the economy and housing is fundamental and the growth of each is intrinsically linked. The emerging Local Plan is currently planning for a minimum provision of 10,820 new homes to be delivered over the plan period, which is split between the north and south of the Borough (6,167 and 4,653 respectively). The emerging Local Plan will therefore need to plan carefully for the identified housing numbers and identify appropriate sites to accommodate that growth.

21. Additionally, there is also significant unmet housing need in the south Hampshire subregion, primarily generated by Test Valley's immediate neighbours Southampton and the New Forest district. On the basis that Test Valley is a relatively unconstrained authority (by comparison to many of the PfSH authority areas) it would be expected that the Borough would seek to accommodate a fair proportion of this unmet need, and any future unmet need.
22. There are parts of the Site which are considered to be suitable and available to accommodate residential development and these too have been put forward as part of the Call for Sites submission. These sites offer potential to meet the localised needs of Thruxton which itself is physically constrained but also suffers from significant supply issues, particularly for smaller-scale (1-3 beds) and affordable homes. The allocation of these sites would contribute towards addressing these issues at a local level and well as contributing towards meeting the Borough's overall housing requirement.

Summary

- There is no existing policy provision which seeks to support or protect Thruxton Aerodrome's important role, specifically in terms of its aeronautical and motorsport functions (which includes a leisure/tourism role) and as a key local employer. The current restrictive policy framework has contributed to a lack of investment over time and a consequential decline in the overall quality of infrastructure and facilities within the Site. This is no longer sustainable and puts into question the long-term viability of the Site.
- The Council's evidence base identifies a need for a significant 81.7ha of employment land to meet demands in the north of the Borough alone. Alongside this there is a need for 6,167 new homes to be delivered in the north of the Borough over the plan period to 2040. The Local Plan should be ambitious and seek to plan to ensure that existing and future needs are met in full.
- The Site is an existing established employment location which performs a key role as an active airfield and racetrack (which has an associated leisure/tourism function). The Site also benefits from direct access to the A303 and the local topography is such that there is potential to accommodate additional development within the Site which is appropriate to its setting.
- The Site (in constituent parts) has been submitted to the SHELAA Call for Sites, alongside these representations. In line with these submissions, there is considered potential for the Site to make a more meaningful contribution to both the commercial and residential needs of the Borough over the plan period.

Western Air (Thruxton) Ltd would welcome further discussions with the Council to ensure that the identified opportunities for the Site to deliver potentially significant social and economic benefits (whilst also addressing the challenges faced by the Site today) are fully considered and duly enabled through the plan making process.

APPENDIX 1
CALL FOR SITES - THRUXTON AERODROME

**Strategic Housing & Economic Land Availability
Assessment 'Call for Sites' Submission Form**

This form should be used to promote land for the Strategic Housing and Economic Land Availability Assessment (SHELAA). The information you submit will be used by the Council to inform future housing and economic land allocations within future Planning Documents and on-going monitoring within the Borough including calculating the five year deliverable housing land supply position.

There is no requirement to resubmit sites afresh, should existing site promoters wish to continue promoting previously submitted sites for the 2017 SHELAA, they are requested to reply to the email which has already been sent out and complete the attached pro-forma.

With regards to residential and economic uses, the Council will accept sites for a net gain of 5 or more dwellings and sites that are 0.25ha (or likely to provide at least 500m² of economic floor space) and above.

This form should also be used to put forward Brownfield sites for inclusion on the Brownfield Register.

How to complete the form:

- Please complete separate forms for each site promoted
- Please provide your name and email address/postal address so that we can contact you to clarify site information if needed
- Please provide a location map (OS map base) clearly identifying the extent of the site boundary marked in red
- Where there are multiple landowners, landownership boundaries must be clearly defined and confirmation must be provided that every landowner agrees to the consideration of the land for possible development.
- **In order to provide us with a complete picture, please provide as much information as possible. Some information is required to be completed and the submission will not be accepted otherwise, these sections are marked with **.**

The SHELAA only identifies sites which have been promoted to the Council, it does not allocate sites. The inclusion of the site in the SHELAA does not imply that the Council would necessarily grant planning permission. Similarly, the identification of potential Brownfield Sites through the SHELAA process does not imply that the Council would necessarily grant planning permission. For further information see the available Guidance Note.

All promoted sites will be made publically available. Individual personal details and land ownership details will be processed in accordance with the Data Protection Act 1998.

Please return the Submission Form to:

By email to: planningpolicy@testvalley.gov.uk

OR

By post to: Planning Policy Team
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
Hampshire, SP10 3AJ

Reference (internal use only)	
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Your Details **

Name	Western Air (Thrupton) Ltd
Contact Address	c/o Agent
Telephone number	c/o Agent
E-mail address	c/o Agent

Agent Details – where applicable

Name	Daniel Melling
Company	Barton Willmore now Stantec
Name of client you are representing	Western Air (Thrupton) Ltd
Company contact address	
Telephone number	
E-mail address	

Site Details **

Site address	Thrupton Aerodrome,	
Location Co-ordinates (OS grid references)	427645	145676
Area of whole site (hectares)	c.165.6ha	
Developable area of site (hectares)		
Are you the landowner?	Yes	X

	No	Who is the landowner? (please include contact details if different from above)	
		Has the landowner given permission for this site to be submitted?	Yes
			No
If the site is under multiple ownership, is there agreement by all parties that the land could be promoted for development?	Yes		
	No		
Does the site comprise greenfield or brownfield (previously developed land)	Greenfield X	Brownfield X	
Where the site comprises both, please indicate the split	(ha)	(ha)	

Complete the table below to the best of your knowledge giving the approximate distance from the submitted site to the key destinations listed.

Key Destination	Name/Address of closest provision	Distance (km) via			Key Destination proposed as part of the development of the site (Yes/No)
		Road	Dedicated footpath separate from road (if applicable)	Dedicated cycleway separate from road (if applicable)	
Town Centre	Andover Town Centre	10	-	-	
Local Centre	-	-	-	-	No
Railway Station	Grateley	5	-	-	
Bus Stop ¹	George Inn	3.3	-	-	No
Primary School	Kimpton, Thruxton and Fyfield C of E Primary School	2.2	-	-	No

¹ For bus stops, these should be in use with a regular service

Secondary School	Harrow Way Community School	9.2	-	-	No
Convenience Store	Rosebourne Foodhall	4.0	-	-	No
Doctors Surgery	The Castle Practice	8.9	-	-	No
Business Park/Industrial Estate	Thrupton Industrial Estate	-	-	-	-
Leisure Facility	Tidworth Leisure Centre	10.6	-	-	-

Current and Potential Use

What is the current use of the site (or if vacant, what was the last use of the site)? If agricultural please specify e.g. grazing, cropping, dairy**	
Aerodrome (operated under an CAA Ordinary Licence) and associated hangers, motor racing, skid pan, kart racing and earthworks.	
What uses surround the site? E.g. agricultural, residential, mixed-use	
Agricultural to the north and west. Residential to the east. Industrial to the south.	
What Agricultural Land Classification does the site have?	
N/A	
Is there an existing planning permission on the site?	
Yes (Please provide planning application number)	The Site has a long and varied planning history relating to various activities and businesses which operate within the Site.
No	

What use do you believe the site is suitable for? Please tick all that apply and explain why **		
Residential – how many dwellings could be provided on this site and of what type?		
Employment – floor space (m ²)	X	The Site is an existing operational airfield which supports a number of businesses but which are currently constrained by the Site's location within the Countryside.
Mixed (residential, industrial, commercial, office)		
Travellers (number of pitches/plots), including Traveller Showpeople		
Self-build or custom build housing		
Retail – floor space (m ²)		
Leisure – floor space (m ²)	X	The Site is an operational racing track with ancillary facilities which support a number of businesses but which are currently constrained by the Site's location within the Countryside.
Other		

Possible Constraints

To the best of your knowledge, please indicate any known constraints that may restrict or prevent development on the site. **		
	<i>Please tick</i>	<i>Please provide further details</i>
Environmental		
Flood risk (Flood Zone)	X	Largely Flood Zone 1. Area of Flood Zone 3 following the route of the Pillhill Brook.
Contamination		
Drainage		
Hazardous waste		
Air quality		
Significant noise sources nearby		
Pollution		
Other <i>please specify</i>	X	Minerals Consultation Area.
Policy		

Planning policies	X	Development within the Countryside.
Heritage, environmental and wildlife designation e.g. SSSI, Conservation Area, Listed Buildings, Wildlife Sites, Scheduled Ancient Monument, Priority habitat/species		
Open space		
Physical		
Access e.g. access over land not controlled by owner		
Tree cover including TPOs		
Topography e.g. site levels		
Local character		
Infrastructure		
Utilities e.g. electricity supply		
Constraints e.g. pylons, overhead cables, pipelines		
Other		
Ownership issues		
Covenants/tenancies/ransom strips		
Market viability		
Other <i>please specify</i>		

If there are constraints on the site, how could they be overcome?

The emerging Local Plan should recognise the existing role and function of the Site through a site-specific allocation. This would enable a more permissive policy framework to support and protect the existing facility and the wide range of functions it performs. The current policy framework is overly restrictive which has contributed to a lack of investment over time and a consequential decline in the overall quality of infrastructure and facilities serving the airfield and racetrack operations in particular.

Please provide details of any consultation with utility providers

Quality of available digital infrastructure

Availability

Is the site immediately available for development? **				
Yes	X	If yes is the site currently for sale and being marketed through a land agent?	Yes	
			No	X
No				

Is there any known developer interest in this site?	
Yes: (Please provide details)	XLB Property
No	
Do you consider this site to be economically viable?	
Yes	X
No	

Does a potential purchaser have an option agreement with the landowner dependent on the site gaining planning permission?	
Yes: (Please provide details)	N/A
No	

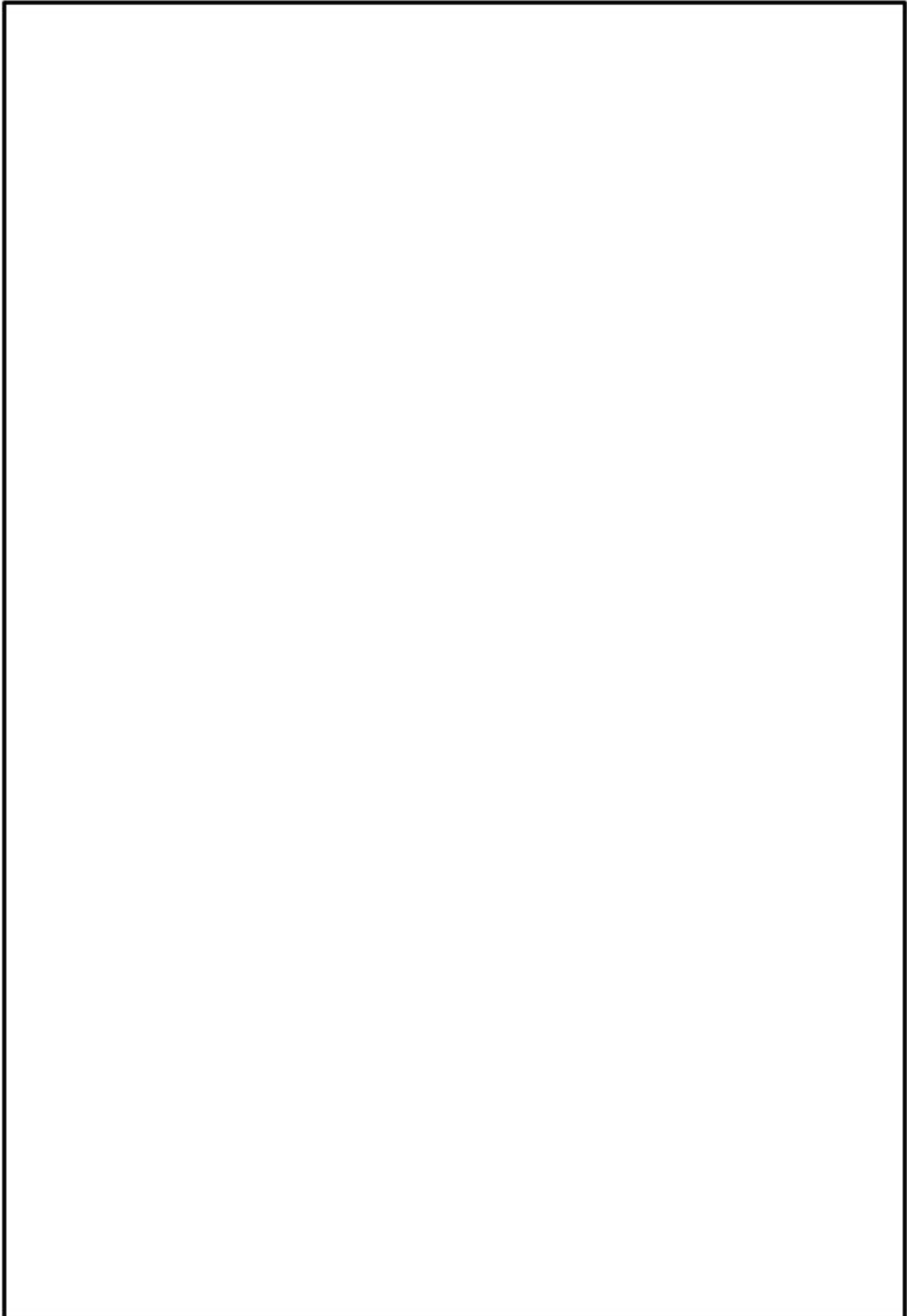
<p>If the site <i>is not immediately available</i> for development, over what broad time frame would you anticipate the site <i>could first become available for development?</i> **</p>
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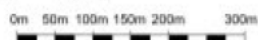
Years					Estimated number of residential units/floor space/pitches etc that the site could accommodate		
0 – 5 years (2019-2024)					X		
6 – 10 years (2024-2029)							
11 – 15 years (2029-2034)							
16 years and beyond (2034-)							
Once started, how many years do you think it would take to develop the site?							
Estimated number of residential units/floor space/pitches etc that the site could accommodate							
1 year 2019/20	2 years 2020/21	3 years 2021/22	4 years 2022/23	5 years 2023/24	6 – 10 years (2024-2029)	11 – 15 years (2029-2034)	Beyond 16 years (2034-)

Surveys and Other Issues

In identifying such a site you are giving permission for an officer of the Authority to access the site in order to ascertain site suitability if necessary. In this context would there be any access issues to the site?	
No	
If yes, please provide contact details of the person who should be contacted to arrange a site visit.	
Agent	
Do you know of any other issues that we should be aware of?	
No	

Please attach an up-to-date Ordnance Survey based map outlining the precise boundaries of the site in its entirety and the part which may be suitable for development (if this is less than the whole). Without this mapped information we are unable to consider the site. **





PRC

APPENDIX 2 CALL FOR SITES – INDUSTRIAL

**Strategic Housing & Economic Land Availability
Assessment 'Call for Sites' Submission Form**

This form should be used to promote land for the Strategic Housing and Economic Land Availability Assessment (SHELAA). The information you submit will be used by the Council to inform future housing and economic land allocations within future Planning Documents and on-going monitoring within the Borough including calculating the five year deliverable housing land supply position.

There is no requirement to resubmit sites afresh, should existing site promoters wish to continue promoting previously submitted sites for the 2017 SHELAA, they are requested to reply to the email which has already been sent out and complete the attached pro-forma.

With regards to residential and economic uses, the Council will accept sites for a net gain of 5 or more dwellings and sites that are 0.25ha (or likely to provide at least 500m² of economic floor space) and above.

This form should also be used to put forward Brownfield sites for inclusion on the Brownfield Register.

How to complete the form:

- Please complete separate forms for each site promoted
- Please provide your name and email address/postal address so that we can contact you to clarify site information if needed
- Please provide a location map (OS map base) clearly identifying the extent of the site boundary marked in red
- Where there are multiple landowners, landownership boundaries must be clearly defined and confirmation must be provided that every landowner agrees to the consideration of the land for possible development.
- **In order to provide us with a complete picture, please provide as much information as possible. Some information is required to be completed and the submission will not be accepted otherwise, these sections are marked with **.**

The SHELAA only identifies sites which have been promoted to the Council, it does not allocate sites. The inclusion of the site in the SHELAA does not imply that the Council would necessarily grant planning permission. Similarly, the identification of potential Brownfield Sites through the SHELAA process does not imply that the Council would necessarily grant planning permission. For further information see the available Guidance Note.

All promoted sites will be made publically available. Individual personal details and land ownership details will be processed in accordance with the Data Protection Act 1998.

Please return the Submission Form to:

By email to: planningpolicy@testvalley.gov.uk

OR

By post to: Planning Policy Team
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
Hampshire, SP10 3AJ

Your Details **	
Name	Western Air (Thrupton) Ltd
Contact Address	c/o Agent
Telephone number	c/o Agent
E-mail address	c/o Agent
Agent Details – where applicable	
Name	Daniel Melling
Company	Barton Willmore now Stantec
Name of client you are representing	Western Air (Thrupton) Ltd
Company contact address	
Telephone number	
E-mail address	

Site Details **		
Site address	Land to the south of Thrupton Aerodrome north of the A303, Thrupton,	
Location Co-ordinates (OS grid references)	427780	145022
Area of whole site (hectares)	c.15ha	
Developable area of site (hectares)	c.15ha	
Are you the landowner?	Yes	X

	No	Who is the landowner? (please include contact details if different from above)	
		Has the landowner given permission for this site to be submitted?	Yes
			No
If the site is under multiple ownership, is there agreement by all parties that the land could be promoted for development?	Yes		
	No		
Does the site comprise greenfield or brownfield (previously developed land)	Greenfield X	Brownfield X	
Where the site comprises both, please indicate the split	(ha)	(ha)	

Complete the table below to the best of your knowledge giving the approximate distance from the submitted site to the key destinations listed.

Key Destination	Name/Address of closest provision	Distance (km) via			Key Destination proposed as part of the development of the site (Yes/No)
		Road	Dedicated footpath separate from road (if applicable)	Dedicated cycleway separate from road (if applicable)	
Town Centre	Andover Town Centre	8.5	-	-	
Local Centre	Thruxton	-	-	-	No
Railway Station	Grateley	5.8	-	-	
Bus Stop ¹	George Inn	1.3	-	-	No
Primary School	Kimpton, Thruxton and Fyfield C of E Primary School	2.0	-	-	No

¹ For bus stops, these should be in use with a regular service

Secondary School	Harrow Way Community School	7.6	-	-	No
Convenience Store	Rosebourne Foodhall	2.4	-	-	No
Doctors Surgery	The Castle Practice	8.1	-	-	No
Business Park/Industrial Estate	Thraxton Industrial Estate	-	-	-	Yes
Leisure Facility	Andover Leisure Centre	10	-	-	Yes

Current and Potential Use

What is the current use of the site (or if vacant, what was the last use of the site)? If agricultural please specify e.g. grazing, cropping, dairy**	
Employment uses within Thruxton Industrial Estate and recycling operations (operated by Earthline).	
What uses surround the site? E.g. agricultural, residential, mixed-use	
Thraxton Aerodrome and Racetrack to the north and residential to the east. Agricultural land to the south and west.	
What Agricultural Land Classification does the site have?	
N/A	
Is there an existing planning permission on the site?	
Yes (Please provide planning application number)	<p>The Site has a long and varied planning history relating to various activities and businesses which operate within the Site. Those of most note are:</p> <ul style="list-style-type: none"> Unit 14 (T2 Hangar) has the benefit of planning permission for 'the operation of a waste transfer and recycling facility' , dated 8th May 1997 (Ref: TVN0063/58). In December 2021, planning

	<p>permission was granted for a modest extension to the existing building and alterations to the yard area (Ref: 12/01883/CMAN).</p> <ul style="list-style-type: none"> • In August 2003, planning permission was granted for a 'Recycling facility to produce secondary aggregates from inert waste' (Ref: TVN00063/77), for a temporary period of four years. Permission was subsequently granted (Ref: 07/02226/CMAN) to enlarge the recycling operation and to extend the time limits for both the use of the recycling facility and the reinstatement of the land (as required under Ref: TVN00063/76) until November 2016 and May 2017 respectively. The time limits were further extended under permissions Ref: 14/02449/CMAN, 16/01089/CMAN and 19/01455/CMAN. There is a current live application seeking a further extension until November 2025 (Ref: 22/00851/CMAN).
No	

What use do you believe the site is suitable for? Please tick all that apply and explain why **		
Residential – how many dwellings could be provided on this site and of what type?		
Employment – floor space (m ²)	X	The Site is an existing, established employment site with direct access to the A303. There is therefore considered potential for the Site to make a more meaningful contribution to the local economy.
Mixed (residential, industrial, commercial, office)		
Travellers (number of pitches/plots), including Traveller Showpeople		
Self-build or custom build housing		
Retail – floor space (m ²)		
Leisure – floor space (m ²)	X	The Site is an existing recreation, leisure and tourism site and offers potential to provide additional facilities (e.g. hotel) which would contribute towards supporting and bolstering existing operations.
Other		

Possible Constraints

To the best of your knowledge, please indicate any known constraints that may restrict or prevent development on the site. **		
	<i>Please tick</i>	<i>Please provide further details</i>
Environmental		
Flood risk (Flood Zone)	X	Largely Flood Zone 1. Area of Flood Zone 3 following the route of the Pillhill Brook.
Contamination		
Drainage		
Hazardous waste		
Air quality		
Significant noise sources nearby		
Pollution		
Other <i>please specify</i>	X	Minerals Consultation Area. Safeguarded waste site.
Policy		
Planning policies	X	Development within the Countryside.
Heritage, environmental and wildlife designation e.g. SSSI, Conservation Area, Listed Buildings, Wildlife Sites, Scheduled Ancient Monument, Priority habitat/species		
Open space		
Physical		
Access e.g. access over land not controlled by owner		
Tree cover including TPOs		
Topography e.g. site levels		
Local character		
Infrastructure		
Utilities e.g. electricity supply		
Constraints e.g. pylons, overhead cables, pipelines		
Other		
Ownership issues		
Covenants/tenancies/ransom strips		
Market viability		

Other <i>please specify</i>		
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If there are constraints on the site, how could they be overcome?

- Current adopted policy recognises the need to support economic development within rural areas in an appropriate manner which respects and protects the character and views of the Countryside. Due to existing bunding to the south, the Site is very well screened and there is therefore limited potential for the character or views of the Countryside to be adversely impacted by development in this location.
- Other material considerations include the need to support Thruxton Aerodrome and Racetrack as a key local employment location; and the significant need for additional employment floorspace to meet demands in the north of the Borough which the Site could material contribute to in an accessible location.

Please provide details of any consultation with utility providers

Quality of available digital infrastructure

Availability

Is the site immediately available for development? **				
Yes	X	If yes is the site currently for sale and being marketed through a land agent?	Yes	
			No	X
No				

Is there any known developer interest in this site?

Yes: (Please provide details)	XLB Property
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Surveys and Other Issues

In identifying such a site you are giving permission for an officer of the Authority to access the site in order to ascertain site suitability if necessary. In this context would there be any access issues to the site?

No

If yes, please provide contact details of the person who should be contacted to arrange a site visit.

Agent

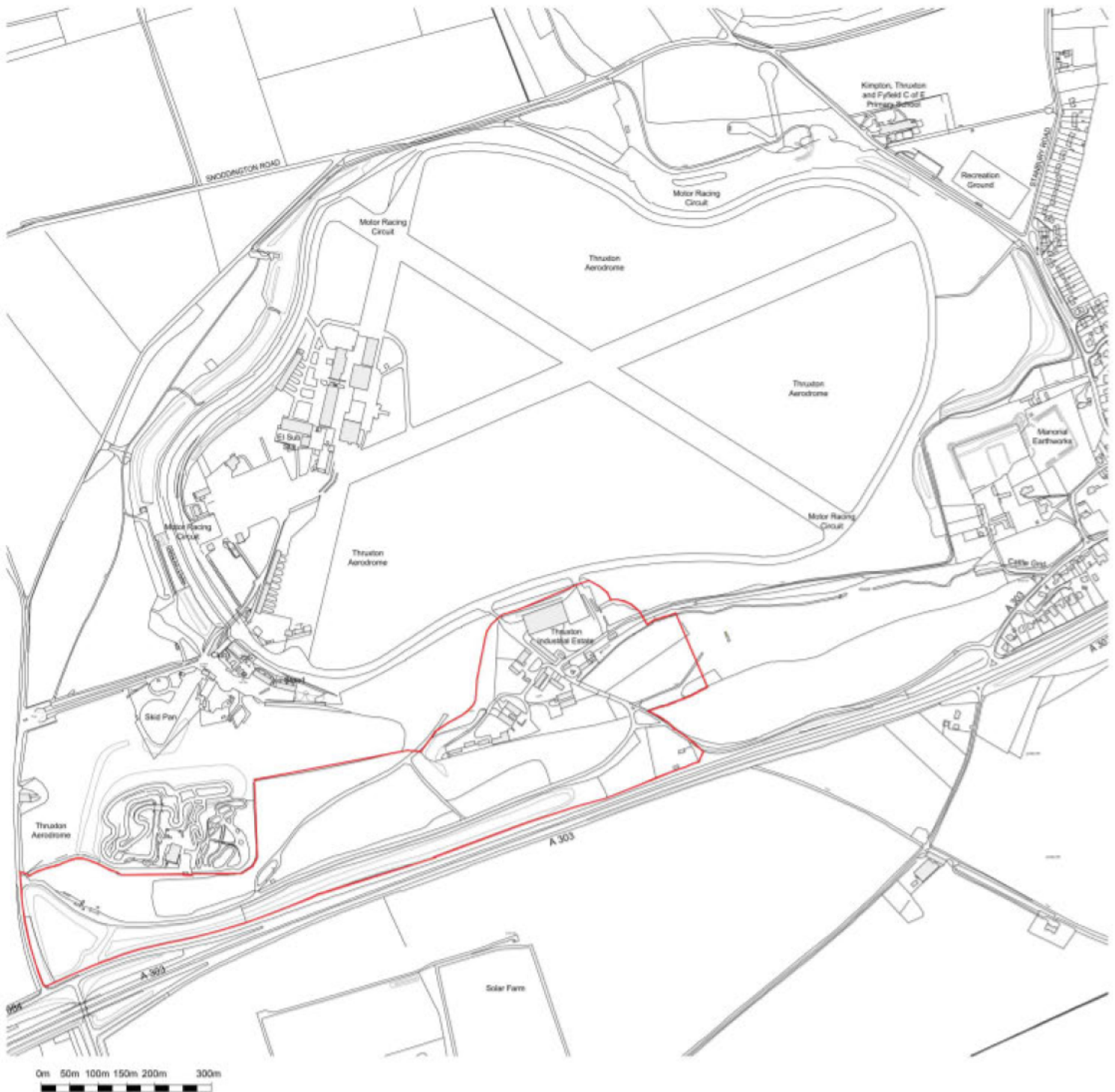
Do you know of any other issues that we should be aware of?

No

Please attach an up-to-date Ordnance Survey based map outlining the precise boundaries of the site in its entirety and the part which may be suitable for development (if this is less than the whole). Without this mapped information we are unable to consider the site. **



N



0m 50m 100m 150m 200m 300m

Client:
XLB PROPERTY / WESTERN AIR

Project:
THRUXTON AERODROME

Drawing Title:
SITE LOCATION PLAN - THRUXTON INDUSTRIAL ESTATE

Scale @ A4: 1:10000	Checked by: ME	Date: APR 22
Job No: 11080	Stage: PL	Drawing No: 010
Construction <input type="checkbox"/>	Preliminary <input type="checkbox"/>	Information <input type="checkbox"/>
Approval <input type="checkbox"/>	Tender <input type="checkbox"/>	

PRC Architecture & Planning

PRC

APPENDIX 3

CALL FOR SITES – RESIDENTIAL 1

**Strategic Housing & Economic Land Availability
Assessment 'Call for Sites' Submission Form**

This form should be used to promote land for the Strategic Housing and Economic Land Availability Assessment (SHELAA). The information you submit will be used by the Council to inform future housing and economic land allocations within future Planning Documents and on-going monitoring within the Borough including calculating the five year deliverable housing land supply position.

There is no requirement to resubmit sites afresh, should existing site promoters wish to continue promoting previously submitted sites for the 2017 SHELAA, they are requested to reply to the email which has already been sent out and complete the attached pro-forma.

With regards to residential and economic uses, the Council will accept sites for a net gain of 5 or more dwellings and sites that are 0.25ha (or likely to provide at least 500m² of economic floor space) and above.

This form should also be used to put forward Brownfield sites for inclusion on the Brownfield Register.

How to complete the form:

- Please complete separate forms for each site promoted
- Please provide your name and email address/postal address so that we can contact you to clarify site information if needed
- Please provide a location map (OS map base) clearly identifying the extent of the site boundary marked in red
- Where there are multiple landowners, landownership boundaries must be clearly defined and confirmation must be provided that every landowner agrees to the consideration of the land for possible development.
- **In order to provide us with a complete picture, please provide as much information as possible. Some information is required to be completed and the submission will not be accepted otherwise, these sections are marked with **.**

The SHELAA only identifies sites which have been promoted to the Council, it does not allocate sites. The inclusion of the site in the SHELAA does not imply that the Council would necessarily grant planning permission. Similarly, the identification of potential Brownfield Sites through the SHELAA process does not imply that the Council would necessarily grant planning permission. For further information see the available Guidance Note.

All promoted sites will be made publically available. Individual personal details and land ownership details will be processed in accordance with the Data Protection Act 1998.

Please return the Submission Form to:

By email to: planningpolicy@testvalley.gov.uk

OR

By post to: Planning Policy Team
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
Hampshire, SP10 3AJ

Reference (internal use only)	
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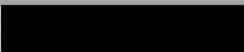
Your Details **

Name	Western Air (Thrupton) Ltd
Contact Address	c/o Agent
Telephone number	c/o Agent
E-mail address	c/o Agent

Agent Details – where applicable

Name	Daniel Melling
Company	Barton Willmore now Stantec
Name of client you are representing	Western Air (Thrupton) Ltd
Company contact address	
Telephone number	
E-mail address	

Site Details **

Site address	Land to the north of Church Lane, Thrupton, 	
Location Co-ordinates (OS grid references)	E: 428954	N: 145671
Area of whole site (hectares)	c.0.34ha	
Developable area of site (hectares)	c.0.34ha	
Are you the landowner?	Yes	X

	No	Who is the landowner? (please include contact details if different from above)	
		Has the landowner given permission for this site to be submitted?	Yes
			No
If the site is under multiple ownership, is there agreement by all parties that the land could be promoted for development?	Yes		
	No		
Does the site comprise greenfield or brownfield (previously developed land)	Greenfield X	Brownfield	
Where the site comprises both, please indicate the split	(ha)	(ha)	

Complete the table below to the best of your knowledge giving the approximate distance from the submitted site to the key destinations listed.

Key Destination	Name/Address of closest provision	Distance (km) via			Key Destination proposed as part of the development of the site (Yes/No)
		Road	Dedicated footpath separate from road (if applicable)	Dedicated cycleway separate from road (if applicable)	
Town Centre	Andover Town Centre	7.6	-	-	
Local Centre	-	-	-	-	No
Railway Station	Grateley	7.4	-	-	
Bus Stop ¹	George Inn	0.3	-	-	No
Primary School	Kimpton, Thruxton and Fyfield C of E Primary School	0.8	-	-	No

¹ For bus stops, these should be in use with a regular service

Secondary School	Harrow Way Community School	6.7	-	-	No
Convenience Store	Rosebourne Foodhall	1.4	-	-	No
Doctors Surgery	The Castle Practice	6.9	-	-	No
Business Park/Industrial Estate	Thrupton Industrial Estate	1.3	-	-	No
Leisure Facility	Andover Leisure Centre	8.3	-	-	No

Current and Potential Use

What is the current use of the site (or if vacant, what was the last use of the site)? If agricultural please specify e.g. grazing, cropping, dairy**	
Open space.	
What uses surround the site? E.g. agricultural, residential, mixed-use	
Residential to south and east. Buriel ground to the west and open space to the north. Thrupton Aerodrome and motor racing circuit to the north west.	
What Agricultural Land Classification does the site have?	
Grade 3	
Is there an existing planning permission on the site?	
Yes (Please provide planning application number)	
No	X

What use do you believe the site is suitable for? Please tick all that apply and explain why **		
Residential – how many dwellings could be provided on this site and of what type?	X	11-13 dwellings including affordable.
Employment – floor space (m ²)		
Mixed (residential, industrial, commercial, office)		
Travellers (number of pitches/plots), including Traveller Showpeople		
Self-build or custom build housing		
Retail – floor space (m ²)		
Leisure – floor space (m ²)		
Other		

Possible Constraints

To the best of your knowledge, please indicate any known constraints that may restrict or prevent development on the site. **		
	<i>Please tick</i>	<i>Please provide further details</i>
Environmental		
Flood risk (Flood Zone)		
Contamination		
Drainage		
Hazardous waste		
Air quality		
Significant noise sources nearby	X	Thruxton Aerodrome and Racetrack to the west.
Pollution		
Other <i>please specify</i>	X	Minerals Consultation Area.
Policy		
Planning policies	X	Development within the Countryside.

Heritage, environmental and wildlife designation e.g. SSSI, Conservation Area, Listed Buildings, Wildlife Sites, Scheduled Ancient Monument, Priority habitat/species	X	<ul style="list-style-type: none"> • Thruxton Conservation Area • Scheduled Monument (Site of Fortified Manor) • Grade I listed Church of St Peter and St Paul and various Grade II listed buildings.
Open space	X	The Site comprises existing open space.
Physical		
Access e.g. access over land not controlled by owner	X	There is currently no direct vehicular access into the Site.
Tree cover including TPOs		
Topography e.g. site levels		
Local character	X	Thruxton Village
Infrastructure		
Utilities e.g. electricity supply		
Constraints e.g. pylons, overhead cables, pipelines		
Other		
Ownership issues		
Covenants/tenancies/ransom strips		
Market viability		
Other <i>please specify</i>		

If there are constraints on the site, how could they be overcome?

- There is a recognised need for smaller homes in the Thruxton area which are currently in short supply. This would help to address a gap in the market which would enable those either looking to step onto the property ladder or to downsize to remain within the Village. In the case of the latter, this would also help to recycle existing larger properties.
- Development is capable of being designed in a manner which is sympathetic to the historic setting and character of the village.
- Development is also capable of being designed to protect the amenity of occupiers from the adjacent Aerodrome and Racing Circuit.

Please provide details of any consultation with utility providers
Quality of available digital infrastructure

Availability

Is the site immediately available for development? **				
Yes	X	If yes is the site currently for sale and being marketed through a land agent?	Yes	
			No	X
No				

Is there any known developer interest in this site?	
Yes: (Please provide details)	XLB Property
No	
Do you consider this site to be economically viable?	
Yes	X
No	

Does a potential purchaser have an option agreement with the landowner dependent on the site gaining planning permission?	
Yes: (Please provide details)	N/A
No	

If the site ***is not immediately available*** for development, over what broad time frame would you anticipate the site ***could first become available for development?*** **

Years					Estimated number of residential units/floor space/pitches etc that the site could accommodate		
0 – 5 years (2019-2024)					11-13		
6 – 10 years (2024-2029)							
11 – 15 years (2029-2034)							
16 years and beyond (2034-)							
Once started, how many years do you think it would take to develop the site?							
Estimated number of residential units/floor space/pitches etc that the site could accommodate							
1 year 2019/20	2 years 2020/21	3 years 2021/22	4 years 2022/23	5 years 2023/24	6 – 10 years (2024-2029)	11 – 15 years (2029-2034)	Beyond 16 years (2034-)

Surveys and Other Issues

In identifying such a site you are giving permission for an officer of the Authority to access the site in order to ascertain site suitability if necessary. In this context would there be any access issues to the site?

No

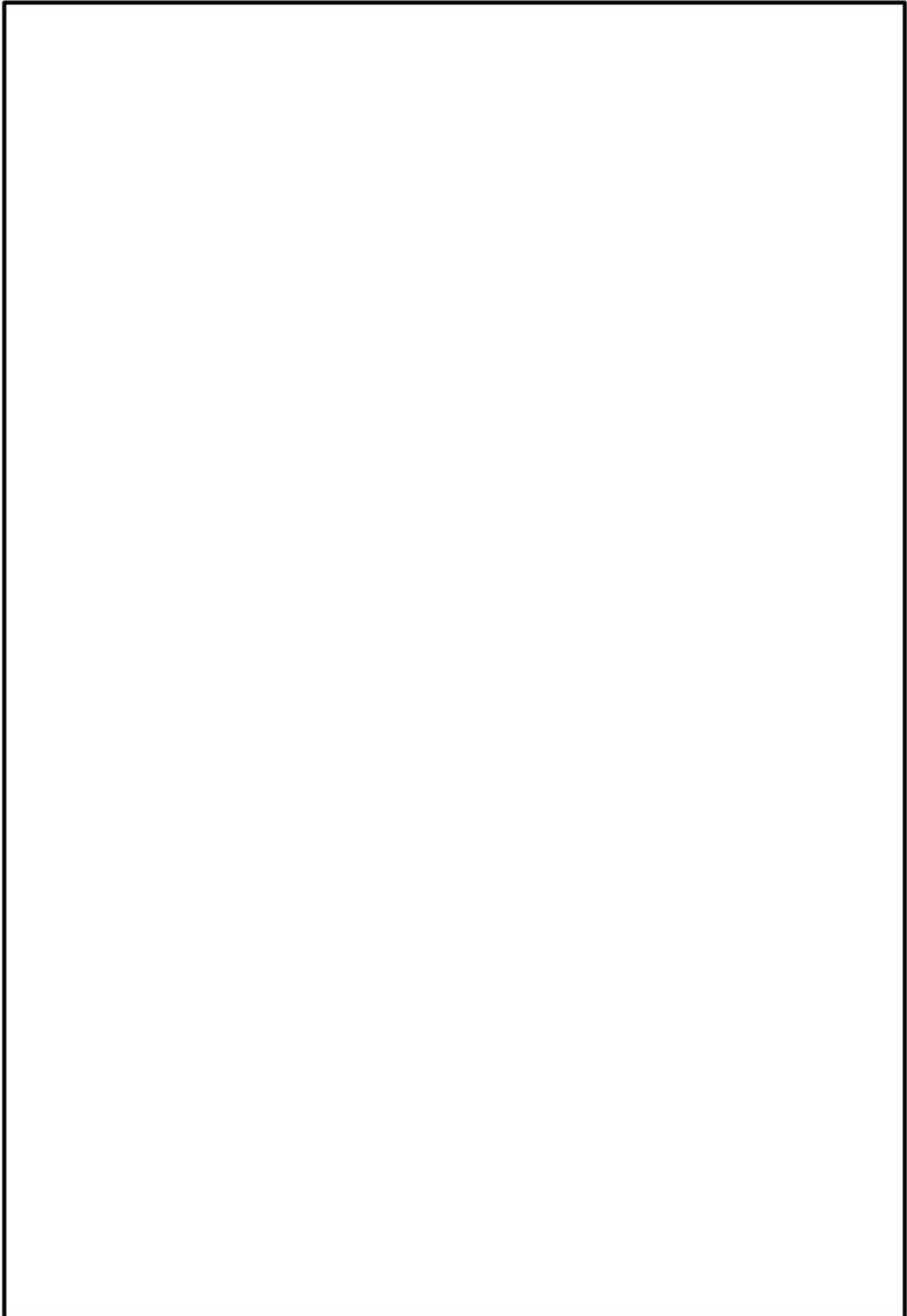
If yes, please provide contact details of the person who should be contacted to arrange a site visit.

Agent

Do you know of any other issues that we should be aware of?

No

Please attach an up-to-date Ordnance Survey based map outlining the precise boundaries of the site in its entirety and the part which may be suitable for development (if this is less than the whole). Without this mapped information we are unable to consider the site. **





Client:
XLB PROPERTY / WESTERN AIR

Project:
THRUXTON AERODROME

Drawing Title:
SITE LOCATION PLAN

Scale @ A4: 1:10000	Checked by: ME	Date: APR 22
Job No: 11080	Stage: PL	Drawing No.: 012
Construction <input type="checkbox"/>	Preliminary <input type="checkbox"/>	Information <input type="checkbox"/>
Approval <input type="checkbox"/>	Tender <input type="checkbox"/>	

PRC Architecture & Planning

PRC

APPENDIX 4

CALL FOR SITES – RESIDENTIAL 2

**Strategic Housing & Economic Land Availability
Assessment 'Call for Sites' Submission Form**

This form should be used to promote land for the Strategic Housing and Economic Land Availability Assessment (SHELAA). The information you submit will be used by the Council to inform future housing and economic land allocations within future Planning Documents and on-going monitoring within the Borough including calculating the five year deliverable housing land supply position.

There is no requirement to resubmit sites afresh, should existing site promoters wish to continue promoting previously submitted sites for the 2017 SHELAA, they are requested to reply to the email which has already been sent out and complete the attached pro-forma.

With regards to residential and economic uses, the Council will accept sites for a net gain of 5 or more dwellings and sites that are 0.25ha (or likely to provide at least 500m² of economic floor space) and above.

This form should also be used to put forward Brownfield sites for inclusion on the Brownfield Register.

How to complete the form:

- Please complete separate forms for each site promoted
- Please provide your name and email address/postal address so that we can contact you to clarify site information if needed
- Please provide a location map (OS map base) clearly identifying the extent of the site boundary marked in red
- Where there are multiple landowners, landownership boundaries must be clearly defined and confirmation must be provided that every landowner agrees to the consideration of the land for possible development.
- **In order to provide us with a complete picture, please provide as much information as possible. Some information is required to be completed and the submission will not be accepted otherwise, these sections are marked with **.**

The SHELAA only identifies sites which have been promoted to the Council, it does not allocate sites. The inclusion of the site in the SHELAA does not imply that the Council would necessarily grant planning permission. Similarly, the identification of potential Brownfield Sites through the SHELAA process does not imply that the Council would necessarily grant planning permission. For further information see the available Guidance Note.

All promoted sites will be made publically available. Individual personal details and land ownership details will be processed in accordance with the Data Protection Act 1998.

Please return the Submission Form to:

By email to: planningpolicy@testvalley.gov.uk

OR

By post to: Planning Policy Team
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
Hampshire, SP10 3AJ

Reference (internal use only)	
-------------------------------	--

Your Details **	
Name	Western Air (Thrupton) Ltd
Contact Address	c/o Agent
Telephone number	c/o Agent
E-mail address	c/o Agent
Agent Details – where applicable	
Name	Daniel Melling
Company	Barton Willmore now Stantec
Name of client you are representing	Western Air (Thrupton) Ltd
Company contact address	

Site Details **		
Site address	Land to the west of Stanbury Road, Thrupton, Andover SP11 8LZ	
Location Co-ordinates (OS grid references)	428941	145801
Area of whole site (hectares)	c.0.7ha	
Developable area of site (hectares)	c.0.7ha	
Are you the landowner?	Yes	X

	No	Who is the landowner? (please include contact details if different from above)	
		Has the landowner given permission for this site to be submitted?	Yes
			No
If the site is under multiple ownership, is there agreement by all parties that the land could be promoted for development?	Yes		
	No		
Does the site comprise greenfield or brownfield (previously developed land)	Greenfield X	Brownfield X	
Where the site comprises both, please indicate the split	(ha)	(ha)	

Complete the table below to the best of your knowledge giving the approximate distance from the submitted site to the key destinations listed.

Key Destination	Name/Address of closest provision	Distance (km) via			Key Destination proposed as part of the development of the site (Yes/No)
		Road	Dedicated footpath separate from road (if applicable)	Dedicated cycleway separate from road (if applicable)	
Town Centre	Andover Town Centre	7.7	-	-	
Local Centre	Thruxton	-	-	-	No
Railway Station	Grateley	7.6	-	-	
Bus Stop ¹	Stanbury Road	0.2	-	-	No
Primary School	Kimpton, Thruxton and Fyfield C of E Primary School	0.5	-	-	No

¹ For bus stops, these should be in use with a regular service

Secondary School	Harrow Way Community School	6.9	-	-	No
Convenience Store	Rosebourne Foodhall	1.5	-	-	No
Doctors Surgery	The Castle Practice	6.7	-	-	No
Business Park/Industrial Estate	Thraxton Industrial Estate	1.6	-	-	No
Leisure Facility	Andover Leisure Centre	8.4	-	-	No

Current and Potential Use

What is the current use of the site (or if vacant, what was the last use of the site)? If agricultural please specify e.g. grazing, cropping, dairy**	
Vacant formerly agricultural use (there are derelict former agricultural buildings on the site).	
What uses surround the site? E.g. agricultural, residential, mixed-use	
Residential to the east. Thraxton Aerodrome and motor racing circuit to the north and west. Open space to the south.	
What Agricultural Land Classification does the site have?	
Grade 3.	
Is there an existing planning permission on the site?	
Yes (Please provide planning application number)	
No	

What use do you believe the site is suitable for? Please tick all that apply and explain why **		
Residential – how many dwellings could be provided on this site and of what type?	X	24-28 dwellings including affordable.
Employment – floor space (m ²)		
Mixed (residential, industrial, commercial, office)		
Travellers (number of pitches/plots), including Traveller Showpeople		
Self-build or custom build housing		
Retail – floor space (m ²)		
Leisure – floor space (m ²)		
Other		

Possible Constraints

To the best of your knowledge, please indicate any known constraints that may restrict or prevent development on the site. **		
	<i>Please tick</i>	<i>Please provide further details</i>
Environmental		
Flood risk (Flood Zone)		
Contamination		
Drainage		
Hazardous waste		
Air quality		
Significant noise sources nearby	X	Thruxton Aerodrome and Racetrack to the north and west.
Pollution		
Other <i>please specify</i>	X	Minerals Consultation Area.
Policy		
Planning policies	X	Development in the Countryside.
Heritage, environmental and wildlife designation e.g. SSSI, Conservation	X	<ul style="list-style-type: none"> Thruxton Conservation Area

Area, Listed Buildings, Wildlife Sites, Scheduled Ancient Monument, Priority habitat/species		<ul style="list-style-type: none"> • Scheduled Monument (Site of Fortified Manor) • Grade I listed Church of St Peter and St Paul and various Grade II listed buildings.
Open space		
Physical		
Access e.g. access over land not controlled by owner		
Tree cover including TPOs	X	Boundary trees to the south.
Topography e.g. site levels		
Local character	X	Thruxton Village
Infrastructure		
Utilities e.g. electricity supply		
Constraints e.g. pylons, overhead cables, pipelines		
Other		
Ownership issues		
Covenants/tenancies/ransom strips		
Market viability		
Other <i>please specify</i>		

<p>If there are constraints on the site, how could they be overcome?</p> <ul style="list-style-type: none"> - There is a recognised need for smaller homes in the Thruxton area which are currently in short supply. This would help to address a gap in the market which would enable those either looking to step onto the property ladder or to downsize to remain within the Village. In the case of the latter, this would also help to recycle existing larger properties. - Development is capable of being designed in a manner which is sympathetic to the historic setting and character of the village. - Development is also capable of being designed to protect the amenity of occupiers from the adjacent Aerodrome and Racing Circuit.
<p>Please provide details of any consultation with utility providers</p>

Quality of available digital infrastructure

Availability

Is the site immediately available for development? **				
Yes	X	If yes is the site currently for sale and being marketed through a land agent?	Yes	
			No	X
No				

Is there any known developer interest in this site?	
Yes: (Please provide details)	XLB Property
No	
Do you consider this site to be economically viable?	
Yes	X
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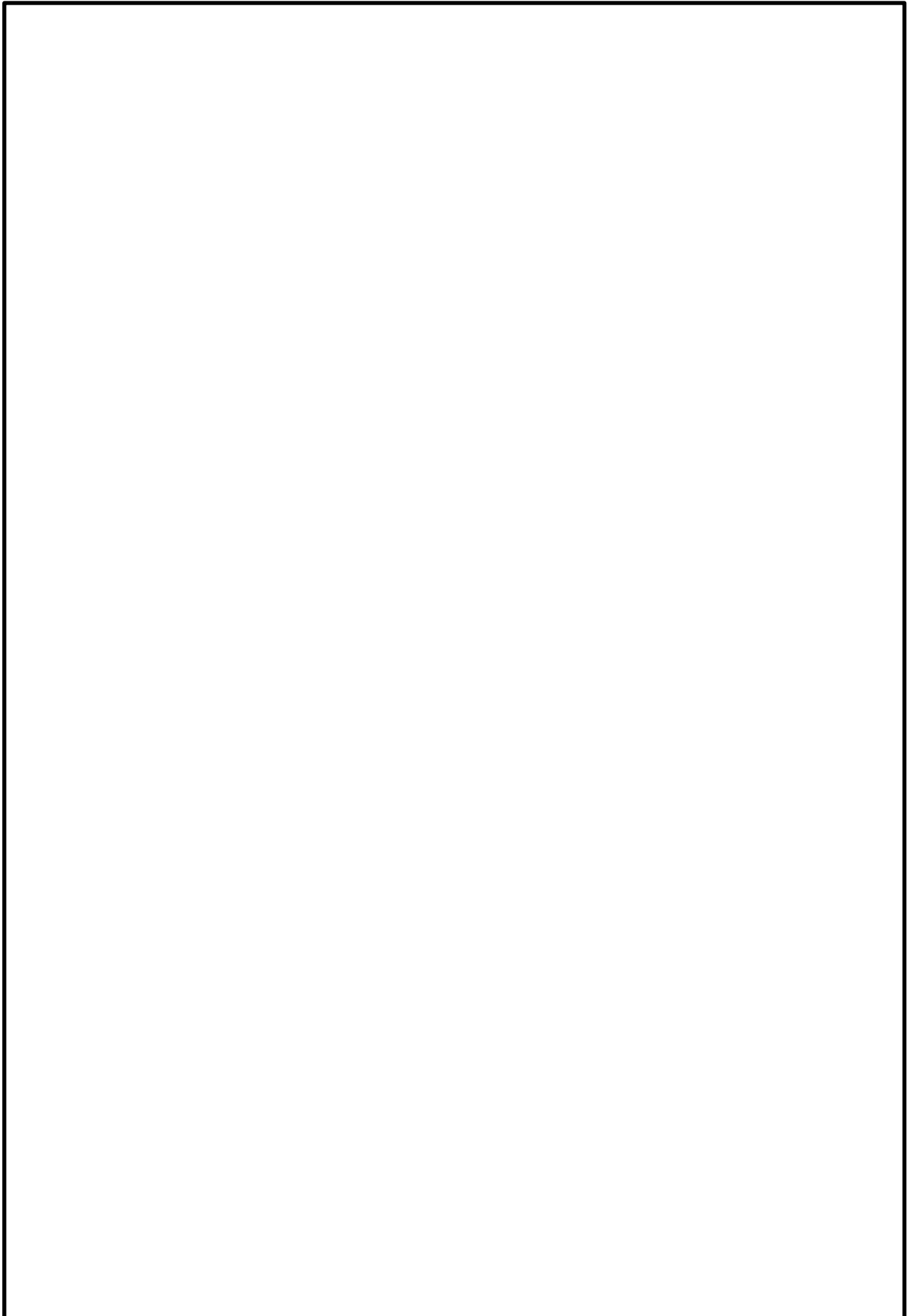
Does a potential purchaser have an option agreement with the landowner dependent on the site gaining planning permission?	
Yes: (Please provide details)	N/A
No	
If the site <u>is not immediately available</u> for development, over what broad time frame would you anticipate the site <u>could first become available for development?</u> **	

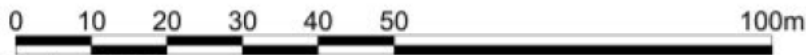
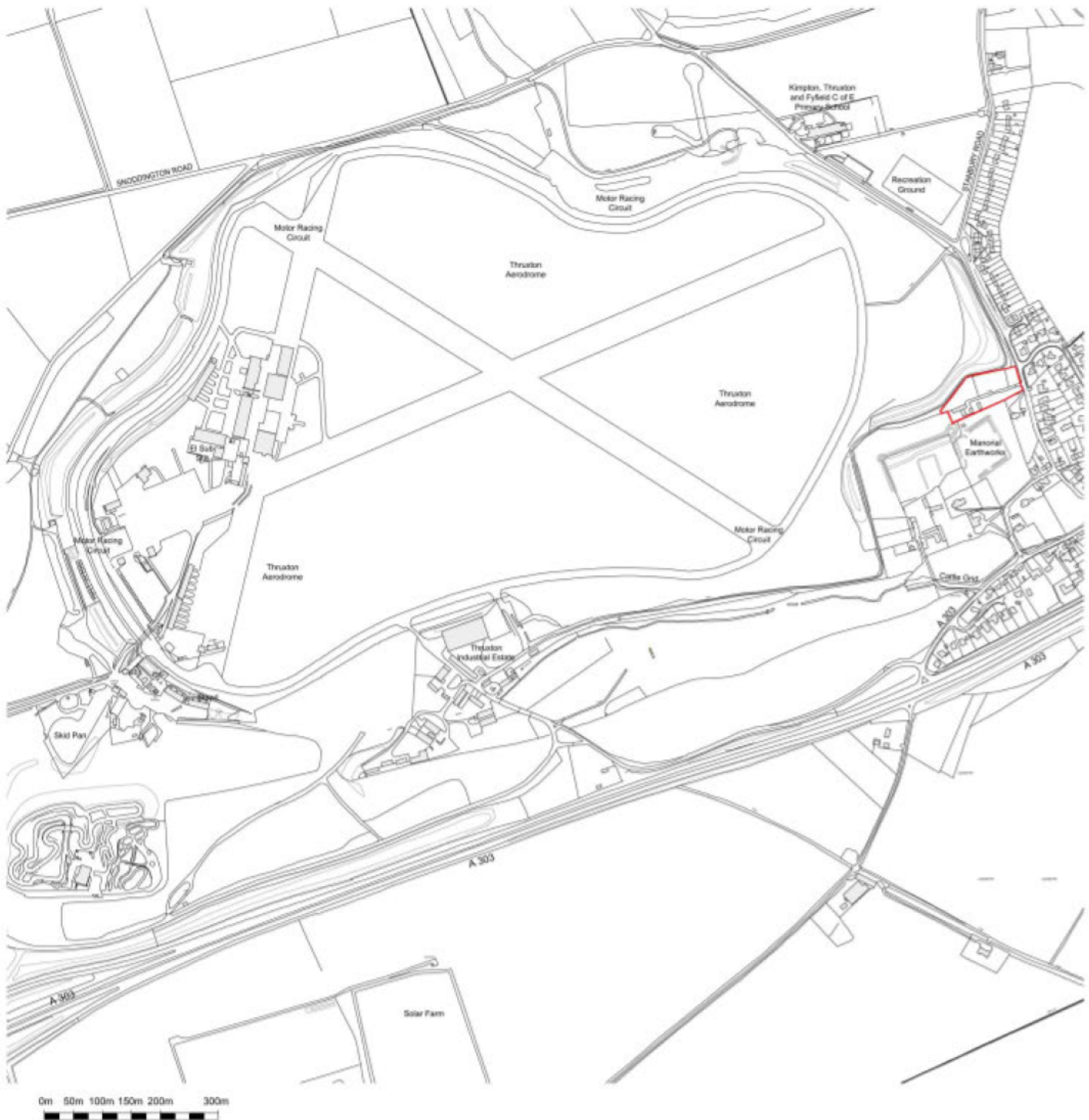
Years					Estimated number of residential units/floor space/pitches etc that the site could accommodate		
0 – 5 years (2019-2024)					X		
6 – 10 years (2024-2029)							
11 – 15 years (2029-2034)							
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Surveys and Other Issues

In identifying such a site you are giving permission for an officer of the Authority to access the site in order to ascertain site suitability if necessary. In this context would there be any access issues to the site?	
No	
If yes, please provide contact details of the person who should be contacted to arrange a site visit.	
Agent	
Do you know of any other issues that we should be aware of?	
No	

Please attach an up-to-date Ordnance Survey based map outlining the precise boundaries of the site in its entirety and the part which may be suitable for development (if this is less than the whole). Without this mapped information we are unable to consider the site. **





Scale 1:1000

Client:	XLB PROPERTY / WESTERN AIR
Project:	THRUXTON AERODROME
Drawing Title:	SITE LOCATION PLAN

Scale @ A4: 1:10000	Checked by : ME	Date : APR 22	
Job No: 11080	Stage : PL	Drawing No : 013	Rev : *

Construction ☐ Preliminary ☐ Information ☐
Approval ☐ Tender ☐

PRC Architecture & Planning



APPENDIX 5
PREVIOUS REPRESENTATIONS

TOWN PLANNING
MASTERPLANNING & URBAN DESIGN
ARCHITECTURE
LANDSCAPE PLANNING & DESIGN
SUSTAINABLE VALUE

INFRASTRUCTURE & ENVIRONMENTAL PLANNING
HERITAGE
GRAPHIC COMMUNICATION
COMMUNICATIONS & ENGAGEMENT
DEVELOPMENT ECONOMICS

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Representations to Test Valley Borough Council Refined Issues and Options Local Plan Consultation

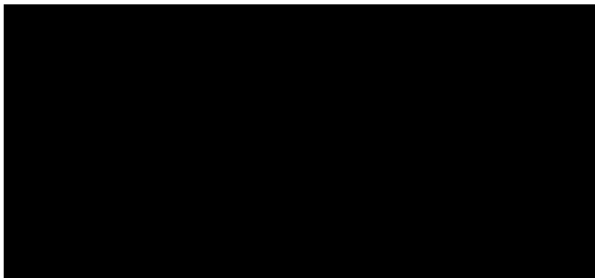
Prepared on behalf of Western Air (Thruxton) Ltd

August 2020

Representations to Test Valley Borough Council Refined Issues and Options Local Plan Consultation

Prepared on behalf of Western Air (Thruxton) Ltd

Project Ref:	32117
Status:	FINAL
Issue/ Rev:	1
Date:	August 2020
Prepared by:	Jane Piper
Checked by:	Paul Newton
Authorised by:	Paul Newton



Ref: 32117/A3/PN/JP
Date: August 2020
Status: FINAL

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2.0	Responses to the Refined Issues and Options Consultation Document	3
3.0	Summary.....	7

APPENDICES

Appendix 1 – Site Location Plan

Appendix 2 – Representations to the Issues and Options Plan (September 2018)

1.0 INTRODUCTION

- 1.1 These representations have been prepared by Barton Willmore LLP on behalf of Western Air (Thruxton) Ltd in response to the Refined Issues and Options Consultation on the Test Valley New Local Plan.
- 1.2 Western Air (Thruxton) Ltd current operate Thruxton Aerodrome ('the site') and surrounding land. The extent of the site is shown on the plan at **Appendix 1**.
- 1.3 The site is located to the north of the A303 and south of Snoddington Road, west of the settlement of Thruxton. Thruxton is the nearest settlement west of Andover, approximately 5 miles away.
- 1.4 The site comprises an aerodrome (operated under an CAA Ordinary Licence) and associated modern hangars for storage and air related businesses, motor racing, skid pan, kart racing and industrial and recycling uses to the south. The industrial uses are provided in a collection of ageing industrial buildings arranged in an ad hoc configuration, providing warehouse, office and industrial floorspace.
- 1.5 The site currently accommodates over 30 separate businesses (on the industrial estate and airfield) and is the focus of economic activity in the local area, positively contributing to the local economy and employment opportunities.
- 1.6 Further, the site has easy access to the A303 and has few physical or environmental constraints.
- 1.7 However, despite the site's current characteristics it is not identified within the adopted Test Valley Borough Revised Local Plan (2016) as an existing employment site or as an area where further development would be encouraged. Indeed, it is currently identified as falling outwith the settlement boundary of Thruxton, within the open countryside and within a mineral consultation area. The existing Local Plan position does not reflect the current site conditions or the important role and function the site plays in the local economy.
- 1.8 The importance of the site to the local area is however recognised in the draft Thruxton Neighbourhood Plan which notes that its relationship with the Parish (of Thruxton) and community is current 'symbiotic and positive'. Indeed, emerging Neighbourhood Plan policy EC1 is supportive of further commercial development at the site provided that it is part of a long term plan for the site and its users, it delivers benefits for the airfield, Parish and local environment and it contributes to the importance of the motor and

aviation industries and its sense of place and identity.

- 1.9 Representations were submitted to the Issues and Options draft Plan (in September 2018) seeking a more permissive policy position particularly in relation to the industrial estate part of the site. A copy of the representations are contained at Appendix 2.
- 1.10 The opportunity now exists to consider the future of the site in a more holistic manner, aimed at securing the long term future of the site and maximising the economic and community benefits it can deliver over the emerging Local Plan period.
- 1.11 The site is available and in our view suitable for development and is evidently deliverable within the Plan period.
- 1.12 As a result, these representations are aimed at encouraging a positive dialogue with both the Local Authority and Parish Council and will be supported by a future Call for Sites submission. We would therefore welcome the opportunity to discuss these representations and the owners' wider aspirations further in due course.

2.0 RESPONSES TO THE REFINED ISSUES AND OPTIONS CONSULTATION DOCUMENT

- 2.1 The refined Issues and Options document is framed as providing a high-level overview of the issues affecting the borough and the potential options to address them. However, in the questions it asks it primarily focusses on some quite detailed and narrowly defined housing matters as opposed to setting out and asking questions on some more fundamental issues. For example, it contains little on how the growth of the borough can best be balanced in a sustainable way, or how the closely interlinked nature of maintaining and growing a successful economy can best be balanced to support existing settlements and the required number of new homes.
- 2.2 It also does not recognise its relationship with neighbouring authorities, not only in unmet housing need, but also in terms of environmental constraints and economic relationships.
- 2.3 Paragraph 8 of NPPF 2019 sets out the overarching objectives of achieving sustainable development, which it states are interdependent and need to be pursued in mutually supportive ways, so that “the opportunities can be taken to secure net gains across each of the different objectives” of economic, social and environmental objectives.
- 2.4 The starting point for a local plan, once land has been identified as available, suitable and achievable, and therefore deliverable (as is the case here) should be considering how sustainable development can be achieved spatially, taking into account where the need for development arises (including unmet need from neighbouring authorities) key infrastructure (existing and opportunities to improve or provide new) as well as relationships with the wider geography the area.

The Economy and Housing

- 2.5 The relationship between the economy and housing is fundamental. The emerging Local Plan is currently planning for the provision of 588 new homes a year. However, the recently published new Standard Methodology for calculating housing need indicates a 38% increase to 813 new homes a year. The emerging Local Plan will therefore need to plan carefully for the additional housing numbers and identify appropriate sites to accommodate that growth.
- 2.6 In addition, there is also significant unmet housing need in the south Hampshire sub-region, which has to be met in or near to where that need arises. This need is primarily generated by Test Valley’s immediate neighbours Southampton and New Forest district

(more than 12,000 dwellings in the Southampton HMA alone and more than 17,000 dwellings in the whole of the Partnership for South Hampshire(PfSH) area to 2036). Using the new Standard Methodology, the average increase in housing provision across the PfSH area will increase by a further 25%.

- 2.7 On the basis that many of the local authority areas in PfSH are restricted by physical or environmental constraints, there are limited options to meet this housing need. Test Valley is however a relatively unconstrained authority and should as a result be seeking to accommodate a fair proportion of this unmet need, and any future unmet need.
- 2.8 It is therefore essential that the emerging local plan recognising this increase in unmet housing need and not only plans for the right amount of housing, but also for the requisite amount of employment, commercial, and service space required to support the growing population and create sustainable communities.
- 2.9 The site represents a sustainable location which can accommodate a mix of uses including residential.

Working in Test Valley (Local Economy)

- 2.10 The refined Issues and Options document (at paragraph 6.12) states that:

"A strong and robust local economy is key to delivering prosperity and quality of life. The next Local Plan will aim to be positive in supporting future economic growth and productivity, alongside quality of life and protecting the Borough's environmental assets which are also important in making the area an attractive business location".

- 2.11 Whilst this statement is welcomed, the emerging Local Plan is also an opportunity for the Council to clearly set out its ambitions for the borough in terms of encouraging inward and external investment. Such a positive statement would provide confidence and encouragement to developers and investors.
- 2.12 Indeed, Paragraph 81 a) of the NPPF (2019) states that planning policies should "set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration." In this regard, the Local Plan should ensure that it considers all relevant strategies when considering an increase to the minimum standard method figure to support future economic growth of the Borough.

- 2.13 The site is located within Northwest Hampshire, as identified in the Enterprise M3 Local Industrial Strategy. The Northwest Hampshire area is significant in size but unlike the other sub-regional areas identified which have multiple settlements in each, it only includes Andover which recognises its more rural character. The area is identified as having strong relationships with the Thames Valley due to the A303 and its direct links to the A34 (leading to M4) and the M3.
- 2.14 Indeed, the refined Issues and Options document (at paragraph 6.13) acknowledges that the borough is easily accessible by road and rail to all corners of the UK, with the A303 being the key distributor road in the borough and a key location for employment opportunities at Andover Business Park and the site.
- 2.15 The Economic Assessment (March 2016) shows that Test Valley has a high representation in growing sectors such as 'wholesale', 'transport & storage' and 'professional, scientific & technical'. This is a positive position when considering the future uncertainty for other employment sectors such as general office and retail provision.
- 2.16 The Employment Land Study (Feb 2018) references the A303 being a key location but primarily focusses on the south coast, acknowledging how the industrial sector along the south coast continues to be 'hot property' with consistent levels of competition seen for all product types.
- 2.17 Paragraph 6.16 of the consultation document states the local plan will make provision for the employment land and premises needed in the borough, taking account of the changes in the structure of the local economy and the requirements for sites and buildings.
- 2.18 There will be many changes in how people live, work, shop and pursue leisure pursuits across the lifetime of the Local Plan. Internet shopping is already having a profound impact on town centres, and this is recognised by the Council with its aspirations to redevelop the main centres of Romsey and Andover. Increased internet shopping will also influence the kind of employment space required as more and more distribution centres will be required on key transport links, not just for Test Valley residents but for the whole of the UK.
- 2.19 When considering needs of this sort a more strategic view needs to be taken as to how a strategic road such as the A303 operates in the distribution network and requirements that may evolve at key locations along it, such as the site.

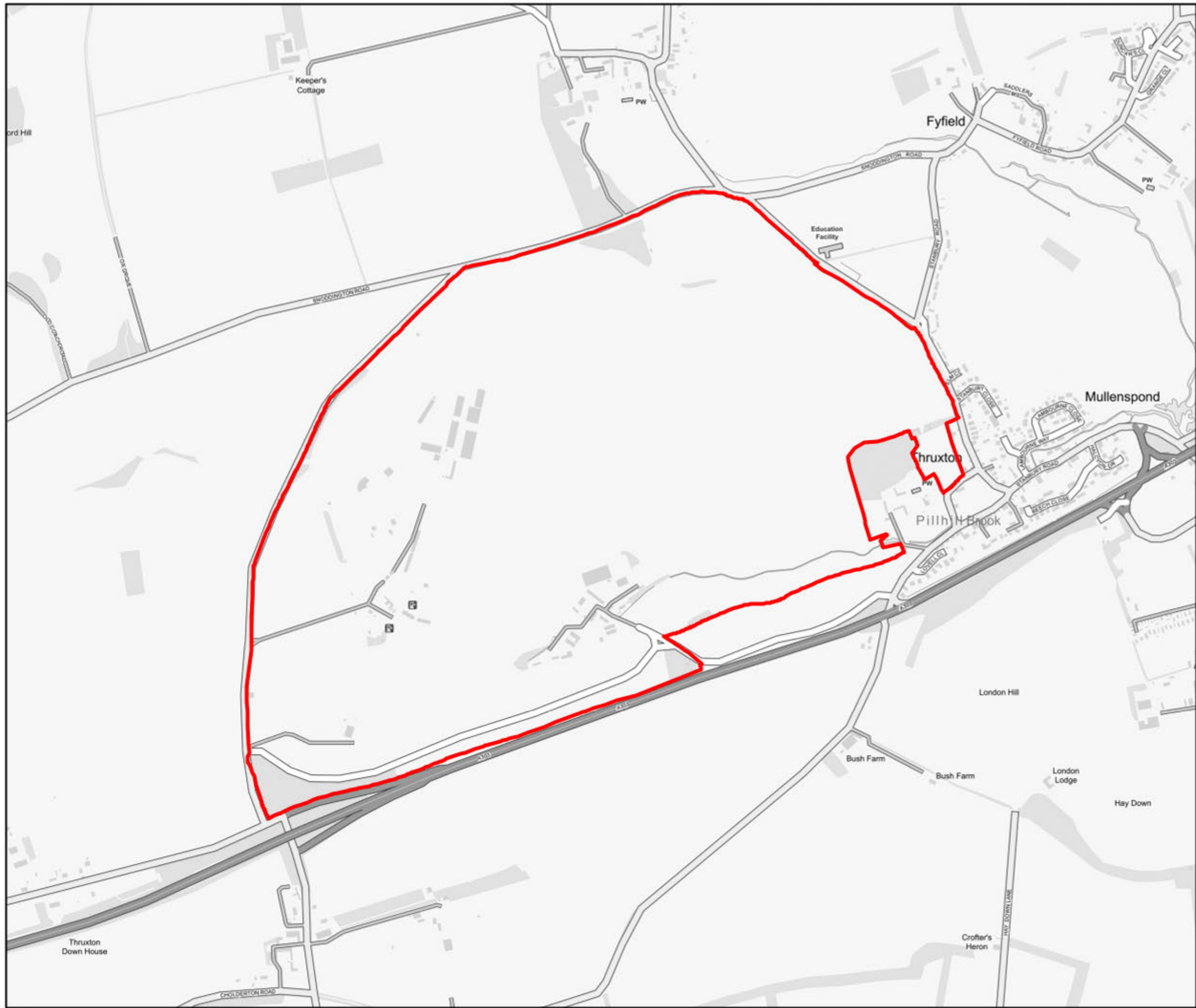
- 2.20 The Government's has recently published a number of changes (and potential changes) to the Use Classes Order, the GDPO and the planning system in general (through the publication of the White Paper: Planning for the Future). A common thread in all of the documents is that land use, and the planning system, will need to be more market-led, more responsive to market changes, and will need to be more flexible than any time in the past to provide for growth and prosperity.
- 2.21 To thrive, existing and important sites such as the site will need to become increasingly multi-functional and flexible to support the mix of commercial, leisure, recreational and tourism uses. This needs to be supported by an ambitious, forward thinking, and flexible planning policy.
- 2.22 Currently, the site is only identified in the draft Neighbourhood Plan. As the emerging Local Plan moves forward, the site should be identified for further development. This would build on the current uses whilst recognising an appropriate amount of flexibility moving forward to allow for businesses to invest, expand, and adapt. This would optimise the site's contribution to the job market and employment offer in this part of the borough.
- 2.23 Indeed, we believe that the site is appropriate for significant development over the plan period, building on its history and reputation to support Andover (and its continued growth), and promoting the area as being attractive for further inward investment and maintaining its commercial competitiveness.
- 2.24 In this regard, Western Air (Thruxton) Ltd would welcome discussing this with the council and how it could be best achieved through a long-term masterplan for the site.

3.0 SUMMARY

- 3.1 The Local Plan should be ambitious and seek to plan to ensure that existing and future communities thrive.
- 3.2 Western Air (Thruxton) Ltd have an aspirations for the site to further contribute to the residential and commercial needs of the borough.
- 3.3 The site is an existing recreation, leisure, tourism and employment site located with easy access on to the A303, the key distributor road in Test Valley.
- 3.4 The site is available and suitable for further development and therefore deliverable to accommodate some of the identified and future needs of the borough.
- 3.5 It is essential that the Local Plan not only plans for the right amount of housing, but also for the requisite amount of employment and commercial opportunities for those growing community across the borough.
- 3.6 When considering needs of this sort a more strategic view needs to be taken as to how a strategic road such as the A303 operates in the distribution network and requirements that may evolve at key locations along it, such as the site.
- 3.7 In order to thrive, the site will need to become increasingly multi-functional and flexible to support the mix of commercial, leisure, recreational and tourism uses. This needs to be supported by an ambitious, forward thinking, and flexible planning policy. This would optimise the site's contribution to the local job market and employment offer for this part of the borough.
- 3.8 Western Air (Thruxton) Ltd would welcome discussing this with the council and how it could be best achieved through a long-term masterplan for the site.
- 3.9 We trust that the representations are helpful. If the Council would consider it beneficial to discuss the representations provided, we would welcome working with the Council as part of the Local Plan preparation process.

APPENDIX 1

Site Location Plan

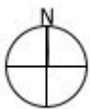


The scaling of this drawing cannot be assured

Revision	Date	Drn	Ckd
-	-	-	-

LEGEND

 Site Boundary



Project
Thruxton Airfield
Western Air (Thruxton) Ltd

Drawing Title
Site Location Plan

Date 25.08.2020	Scale 1:10,000 @A3	Drawn by ML	Check by PN
Project No 32117	Drawing No LN-P-01	Revision -	



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Representations to the Issues and Options Plan (September 2018)

Planning Policy

From: [REDACTED]
Sent: 07 September 2018 15:01
To: Planning Policy
Cc: David Ramsay
Subject: Representation to Issues and Options Consultation for the next Local Plan 2036 - Thruxton Industrial Estate Andover
Attachments: Representation Letter - Issues and Options Consultation Local Plan 2036 - Thruxton Industrial Estate Andover.pdf

Dear Test Valley Planning Policy Team,

Please find attached a representation to your Issues and Options Consultation for the next Local Plan 2036. This representation relates to the Thruxton Industrial Estate Andover.




I look forward to hearing your response to this representation.

Kind regards,

Ben Christian

Ben Christian BSc (Hons), MSc, MRTPI Senior Planner

T: [REDACTED] M: [REDACTED] E: [REDACTED]

Birmingham Crawley Guildford Heathrow London Portsmouth Reading Southampton

Vail Williams

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Ref: P18-2449
Date: September 2018



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Test Valley Borough Council
Beech Hurst
Weyhill Road
ANDOVER Hampshire
SP10 3AJ

Dear Sir/Madam

Representation to the Issues and Options Consultation for the Test Valley Borough Local Plan 2036 on behalf of Western Air (Thruxton) Ltd in respect of their site Thruxton Industrial Estate, Thruxton Airport, Andover SP11 8PW.

Vail Williams LLP have been instructed by Western Air (Thruxton) Ltd to submit representations to the above consultation in respect of the allocation of Thruxton Industrial Estate as an existing employment site. This consultation by Test Valley Borough Council has a response period expiring on the 14th September 2018.

The Site

The Thruxton Industrial Estate site is located within the administrative boundary of the Test Valley Borough Council.



Figure 1: Aerial View of Thruxton Industrial Estate (Courtesy Of Google)

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The site is located west of the village of Thruxton which is to the west of the nearest major settlement of Andover. To the north of the site is the Thruxton Aerodrome and motor circuit. To the south of the site is the A303 and beyond this agricultural fields. To the west of the site is the Thruxton Kart Centre and an aggregate storage facility.

The industrial estate is currently a collection of ageing industrial sheds arranged in an ad hoc format. The uses of the buildings are commercial including warehouse, office and industrial uses. The buildings are sporadically located amongst areas of grassland with access roads achieving the most direct routes from the estate point of access in the south-eastern corner.

The existing access to the site is via a 1.2km lane which starts from the main access road into Thruxton Airport and Motor Circuit in the south-western end of the Western Air (Thruxton) Ltd ownership. The access lane then follows the southern boundary of the ownership until reaching the Industrial Estate. The main access to the Thruxton Airport and Motor Circuit complex (including the Industrial Estate) has easy access to the A303.

In order to mitigate any noise produced by the Thruxton Motor Circuit and Airport, large bunded mounds have been created which surround the Industrial Estate giving it the appearance of sitting within a valley.

The site is located predominately within flood zone 1 but a section of flood zone 3 runs through the centre of the site following the line of Pill Hill Brook. Work has been undertaken to manage the flood risk. Planning history records exist for the bunds and flood alleviation works.

No historic assets exist on the site according to Historic England but a number of listed buildings are located in Thruxton village and a Scheduled Ancient Monument is in the north-west corner of the village bordering the Motor Circuit.

No ecological designations are on or adjacent to the site according to Magic.gov.

Representation

Thruxton Industrial Estate is not identified within the adopted Test Valley Borough Revised Local Plan (2016) as an existing employment site. The proposals map for this Local Plan identifies the site as outside of the settlement boundary of Thruxton and within the countryside and also a mineral consultation area.

Industrial Estates in a similar countryside location to Thruxton Industrial Estate (located within the countryside) are identified as existing employment sites and their operations supported by Local Policy LE17 (employment sites in the countryside). A nearby example is Harewood Forest Industrial Estate which is located within a countryside location but is identified as an existing employment site.

Policy LE17 (employment sites in the countryside) details that the redevelopment extension of the buildings or erection of new buildings on existing employment sites for employment use will be permitted provided that:

- a) it is contained within the lawful employment site;
- b) the proposal is well related to any retained buildings;
- c) it does not include outside storage where this could be visually intrusive.

We are supportive of this Policy being within the Local Plan and would encourage the Local Planning Authority to transpose this Policy into the new Local Plan.

As Thruxton Industrial Estate is not currently identified within the Local Plan proposals map as an existing employment site the opportunities offered by Policy LE17 do not apply. The operations at Thruxton Industrial Estate do however reflect the characteristics outlined within the supporting text of Policy LE17 (paragraph 6.92). Paragraph 6.92 states that employment sites within the countryside have a variety of industrial, storage or business uses, comprise an important element of the rural economy and provide local job opportunities for those in rural areas.

The purpose of this representation is to request that Thruxton Industrial Estate is included within the Local Plan 2036 as an existing employment site. This would ensure that the continuing commercial operations of the estate are supported by the employment sites in the countryside policy. For the survival of this rural Industrial Estate it is also essential that the uses are not restricted to being associated with the Motor Circuit and Airport but are open to B1, B2 and B8 uses which typify an industrial estate.

National Planning Policy supports the proposed allocation of Thruxton Industrial Estate as an existing employment site within local policy. The following paragraphs within the National Planning Policy Framework (adopted 2018) are of relevance.

Paragraph 80 of the NPPF states that planning policy and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should also be placed on the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development that paragraph 80 encourages.

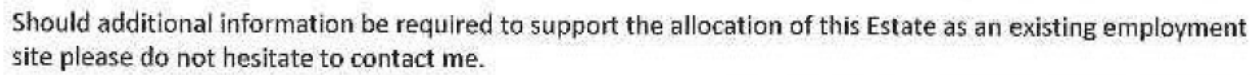
Paragraph 81 of the NPPF details that planning policies should:

- set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth;
- set criteria, or identify strategic sites, for local and inward investment to match the strategy and meet anticipated needs over the plan period;
- seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and
- be flexible enough to accommodate the needs not anticipated in the plan, allowing for new and flexible working practices, and to enable a rapid response to changes in economic circumstances.

To support a prosperous rural economy NPPF paragraph 83 states that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas both through conversion of existing building and well designed new buildings.

Summary

Based on National Policy support, the long term existence of Thruxton Industrial Estate as an employment site and the nature of the operations taking place at the Estate, it is requested that the Estate is identified as an existing employment site within Local Plan 2036. This allocation is essential to the long term retention of this locally important employment site to protect and promote local business and provide security for local employment.



Yours faithfully

Forwarded on Feb. 16, 1976, 11:00 AM, 11:15