

**DRAFT TEST VALLEY LOCAL PLAN 2040**

**REGULATION 18 – PART 2 – CONSULTATION**

**RESPONSE ON BEHALF  
OF  
THE MARSHALL FAMILY**

**Carter Jonas**

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## APPENDIX A: VISION DOCUMENT - LAND NORTH OF SANDY LANE

## 1.0 INTRODUCTION

- 1.1 Carter Jonas is instructed by **the Marshall Family** to respond to Test Valley Borough Council's ("**the Council**") Draft Test Valley Local Plan 2040, Regulation 18 – Part 2, ("**the Local Plan**") consultation.
- 1.2 The Marshall Family own land to the North of Sandy Lane, Romsey. The site is identified in the Strategic Housing & Economic Land Availability Assessment (SHELAA) (January 2024) as site reference 187. The SHELAA confirms that the site is 'available,' 'achievable' and 'deliverable' for development with a residential development capacity of around 333 dwellings.
- 1.3 The Marshall Family confirms that the site remains available for development. It therefore has significant potential to become a development site allocation through the emerging Local Plan.
- 1.4 The consultation document and the supporting evidence has been reviewed, and The Marshall Family is pleased to be able to comment on a well-developed draft plan. The general direction of the Local Plan is noted, and some comments and concerns about the Plan are raised hereunder. However, it is in everyone's interest for the Council to have a robust and sound plan, regardless of individual land interests at this time.

### **Land North of Sandy Lane.**

- 1.5 Land North of Sandy Lane, Romsey ("the site"), is an unrestored area of gravel working dating back to the Second World War which, on the basis of the definition in the National Planning Policy Framework ("the NPPF"), makes it previously developed land.
- 1.6 The Site is relatively flat with a gentle slope from north to south. There are some trees and hedges at the boundaries of the Site, especially at the south along Belbins/Sandy Lane. 1.15ha of Belbins West is in use for storage and distribution, as is 0.2ha in the south-west corner of Belbins East. The land is accessed off Sandy Lane.
- 1.7 There is a farm to the north, which also uses this access. The Marshall Family understands however that the landowner has a right of way over a length of the access track and that there may be scope to extend that right further. Nonetheless, an access to the farm to the north will need to be maintained.
- 1.8 To the west is Wynford Industrial Park accommodating several occupiers including a timber building/fencing company and a camper van repair company. Belbins Business Park is located to the south of Sandy Lane opposite the Site. There has been a significant amount of residential development in Romsey over the past 10 years, including Abbotswood to the south of Sandy Lane.
- 1.9 The site is in a sustainable location at the edge of Romsey, which is identified as a 'Major Centre' in the Local Plan Settlement Hierarchy. Major Centres are settlements with the widest range of facilities and services in the Borough and are more accessible due to better public transport provision.
- 1.10 More detail on the site is provided later in these submissions and in the Vision Document that can be read at **Appendix A**.



## 2.0 DUTY TO COOPERATE

2.1 The Marshall Family notes the commentary in the Local Plan regarding the Duty to Cooperate, and the Council's acknowledgement that there are strategic matters which will require its response. The Marshall Family notes, in particular, that the Council has cited helping to meet the housing (and employment) needs of South Hampshire as a strategic cross boundary matter which will need full consideration.

2.2 The NPPF at paragraph 24, outlines that:

*"Local planning authorities and county councils (in two-tier areas) are under a duty to cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries."*

2.3 Most critically, at paragraph 26, the NPPF explains that:

*"Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere."*

2.4 It is therefore encouraging to note that in the supporting Duty to Cooperate 'Topic Paper' there is comment relating to engagement with the Partnership for South Hampshire (PfSH) as part of the PfSH Spatial Position Statement (SPS). The "outcomes" so far from this engagement suggest that there is likely to be unmet housing needs in the wider PfSH area, and that a shortfall of some 11,771 dwellings is identified.

2.5 In the SPS, at Table 1, it can be observed that two significant constituent parts of the 11,771 dwellings figure are from the New Forest and Eastleigh (together these two authorities contribute over 8,000 dwellings to the total 'shortfall'). The New Forest and Eastleigh are direct neighbours of Test Valley, and as such it is logical for some of their unmet needs to be met nearby in Test Valley. The housing need of the New Forest will be particularly important to plan for out with its boundaries given its National Park status.

2.6 The Marshall Family also notes that in the SPS it is assumed that there will be no unmet housing need from Southampton. This, it is argued, is because the housing needs for the City are inflated by the "Urban Uplift" applied through the Standard Methodology, which should be met in the authority area in question. Whilst this approach follows planning guidance, there is some flexibility, especially at the northern edge of Southampton (i.e., in southern Test Valley) to meet additional housing needs. This approach would give people a home to live in, and access to employment and services in the local area, and in Southampton, regardless of the arithmetic derivation of those needs.

- 2.7 The Marshall Family encourages the Council to make a positive commitment to helping meet some of the identified unmet housing need, and to allocate housing in the Local Plan to facilitate this.

### **3.0 VISION & OBJECTIVES**

#### **Vision**

- 3.1 The Marshall Family notes that the Council has developed a refreshed vision that sets out the Council's approach to planning for the Borough's future. The Marshall Family welcomes the acknowledgement and commitment to meeting housing need, and affordable housing need, and supporting a thriving local economy.
- 3.2 The Marshall Family also notes the emphasis on climate change, the natural and built environment and that local character and identity are key to the vision of the emerging Local Plan.
- 3.3 Also included in the vision is the comment that Romsey will have a thriving town centre, offering high quality connected green and public spaces and a mix of leisure, shopping and cultural facilities and homes, with sustainable transport connections. The Marshall Family very much supports this part of the vision, and suggests that land north of Sandy Lane can play an important part in realising it.

#### **Objectives**

- 3.4 The Marshall Family believes that the proposed objectives are reasonable and create a good basis for the rest of the Local Plan.
- 3.5 Planning for new homes, a thriving economy, and necessary infrastructure is supported alongside managing the impacts on the natural and historic environment.
- 3.6 The objectives aimed at carbon management, climate change resilience, and nature recovery are laudable. However, the evidence that underpins these objectives needs to be more robust and needs to have regard to the likelihood that legislation, and or regulation may overtake the way that these matters are dealt with through the planning and development process.

#### **Plan Period**

- 3.7 The Council's Local Development Scheme notes that the Council expects to adopt the Local Plan in Q2 of 2026. This means that on adoption the local plan will have a life span of fewer than 15 years which is inconsistent with paragraph 22 of the NPPF which requires Local Plans to look ahead for a minimum of 15 years from adoption. The Council must, therefore, extend the plan period by a year to ensure that on adoption the plan period is consistent with the requirements of national policy.
- 3.8 The Marshall Family also questions the necessity of the plan period starting at 2020/21, and including the years 2021/22 and 2022/23. Given that the plan will be adopted in 2026 delivery during these three years would have little to do with the remaining plan period and as such it is unnecessary for the plan period to go back so far.

- 3.9 Regarding development needs it is also the case that – currently (although this should be kept under review) – the standard method is based on the period 2024 to 2034 with the affordability ratio relating to income and house prices in 2023. This would suggest that the most appropriate start date for the plan period would be 2023/24. The end date for the Local Plan, then, should be 2040/41.

## 4.0 THE SPATIAL STRATEGY

### **Spatial strategy and settlement hierarchy (Policy SS1)**

- 4.1 The Marshall Family recognises the strengths of the proposed spatial strategy which seeks to focus development in the “most sustainable locations,” i.e., the largest settlements in the Borough.
- 4.2 Romsey (along with Andover) is rightly going to continue to be the focus for growth as the most sustainable location, with the greatest level and diversity of facilities and services. Romsey also has a very good transport network and strong connectivity across its urban area, with dispersed employment locations.
- 4.3 There is greater capacity for Romsey to sustainably grow than is presented in the Local Plan, and land north of Sandy Lane should be included as a site allocation to meet the increased housing need, in the most sustainable location in the borough.

### **Settlement boundaries (Policy SS2)**

- 4.4 Gleeson’s opinion is that settlement boundaries are an arbitrary and blunt instrument, which do not have regard to the contribution that some open spaces within settlements make to the character and appearance of those settlements. In terms of impact on amenity and the local landscape it might be preferable to locate new homes in edge of village locations which technically, might sit outside the arbitrary boundaries. It is therefore suggested that the philosophy and operation of settlement boundaries is negative and not necessarily generally fit for purpose.

### **Housing requirement (Policy SS3)**

- 4.5 The Marshall Family welcomes the Council’s acceptance that the housing requirement in the Local Plan must start with the Standard Methodology. However, The Marshall Family also highlights that the NPPF sets out, at paragraph 61 (with our emphasis), that:

*“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance. The outcome of the standard method is an advisory starting-point for establishing a housing requirement for the area...”*

- 4.6 It is agreed then that the minimum starting point for the number of homes needed in Test Valley is likely to be around 11,000 new homes across the plan period, or around 550 per year. It is also noted that the housing number derived from the Standard

Methodology should be kept under review and, as such, The Marshall Family may well comment on this figure again at the next stage of Local Plan consultation.

- 4.7 After establishing the minimum starting point for the housing need in the housing market area (which The Marshall Family notes is defined in the housing market assessment as the continued north/south split of the borough area), the Council should next consider whether there are grounds for 'uplifts' to meet specific housing needs.
- 4.8 In the Housing 'Topic Paper', at paragraph 8.4, it is explained that the Strategic Housing Market Assessment (SHMA) identifies the annual need for affordable housing in the Borough. The identified need is 437 affordable homes for rent and 215 affordable home ownership homes per annum, a total of 652 dwellings per annum (dpa). To meet this level of affordable housing need, it is argued in the Housing Topic Paper, would require an annual housing requirement of 1,222 dpa.
- 4.9 It is not clear how the figure of 1,222 dpa has been alighted upon, because if the annualised figures are considered, and are considered as 40% of the overall delivery of housing in a given year (which would reflect the best-case scenario proposed in policy for HOU1 for Affordable Housing in the Local Plan consultation), it reveals that 1,630 dpa would be required.
- 4.10 Therefore, the proposed annual housing requirement of 550 dwellings per year, which would provide 220 affordable homes (at best) will only meet about a third of the predicted need. It should also be remembered that the actual delivery of affordable homes will be much less than the 40% suggested in headline in policy HOU1. This is because the policy itself has a reduced requirement of some sites, but moreover, many permitted sites will be exempt from delivering affordable houses, either because the sites are too small, are redevelopment sites with "vacant building credit," or because some sites simply cannot be viably delivered with the expected level of affordable homes.
- 4.11 The Marshall Family does note that the Council's argument is that:
- "The SHMA does not identify a demand for this level [1,222 dpa] of market housing. Limitations in demand for market housing would likely result in the both the housing requirement and absolute affordable housing need not being provided..."*
- 4.12 It might be that an uplift to meet the entirety of the affordable housing need is not justified, but simply by considering the identified level of that need, and contemplating how it might be delivered, suggests that there is a strong case to uplift the Local Housing Need: which is, of course, the minimum starting point for housing need (as derived from the Standard Methodology). The housing requirement in the Local Plan Update should be set at a higher level to go further in meeting the affordable housing needs across the Borough.
- 4.13 The housing requirement should be increased, and further development site allocations should be made, including at land north of Sandy Lane, Romsey.
- 4.14 There is limited discussion about the 'economic strategy' for Test Valley (2017 – 2019 and beyond) in the Local Plan. It is therefore difficult to ascertain whether any uplift in

housing numbers might be required to support economic growth. The Marshall Family suggests that the Council should set out its case for economic growth more clearly in the publication version of the Local Plan, and also justify why the housing requirement has (or had not) been uplifted in the light of that strategy.

- 4.15 Gleeson, again, notes that there is likely to be some amount of unmet housing needs in neighbouring areas that the Council must also consider. Whilst the Council states at paragraph 3.59 that there is no clear evidence for the scale of unmet needs, it is evident from the PfSH Position Statement that there are unmet needs across south Hampshire between 2023 and 3036. Whilst it could be expected that delivery may be increased in some areas, such as Eastleigh, other LPA like Gosport, Havant, Portsmouth, and Southampton are constrained by their geography and borders that are drawn tight to the urban edge or in the case of the New Forest they are constrained by the National Park. It is therefore essential that the Council starts planning now to increase the supply of homes to address some of these needs.

#### **Other housing needs**

- 4.16 Planning Practice Guidance (PPG) explains how local planning authorities should analyse the needs of specific parts of their communities and adapt the Local Plan to respond to these needs. One way that the needs of specific parts of the community's housing need can be met is it to increase the overall housing requirement in the Local Plan, and thereafter seek that proportions of the target are delivered as particular housing types (i.e. Affordable Homes, or Care Homes, or Extra-care etc.).
- 4.17 The Marshall Family is concerned, as is set out above, that the Council is not doing enough to meet the identified affordable housing needs of the borough. The housing requirement in the plan should be higher, to facilitate the delivery of more affordable homes.
- 4.18 Turning to the needs of older people, The Marshall Family suggests that the Council should identify the level of care accommodation need and include a target to meet that need in the Local Plan. It is suggested in the Housing 'Topic paper' (at paragraph 8.7) that:

*The SHMA has considered the housing needs of the older person population and the population with some form of disability. The analysis responds to Planning Practice Guidance on Housing for Older and Disabled People published by Government in June 2019...*

- 4.19 The Marshall Family welcomes that the Council's acknowledgement that there might be some specific housing needs in the borough. The commentary in the Housing 'Topic Paper' goes on to explain that:

*"The data shows in general that Test Valley has a slightly 'older' age structure and lower levels of disability compared with the national average. The older person population is projected to increase notably in the future and an ageing population means that the number of people with disabilities is likely to increase substantially."*

- 4.20 The analysis in the Test Valley Strategic Housing Market Assessment, January 2022 (at paragraph 7.37) concludes that over the plan period there is need for around an additional 2,242 specialist older person accommodation units.
- 4.21 The Marshall Family generally agrees with the analysis, and points to the GLA 2021-based Population Projections, that are underpinned for recent demographic trends, as opposed to the dated current Office for National Statistics projections. The GLA projections suggest that in 2020 just over 10.2% of the population in Test Valley was aged over 75 (around 13,100 people) and by 2040 this is set to grow to nearly 14.4% of the borough's population (more than 21,600 people). This reflects the situation across the UK, of an aging population, but it is a significant challenge for Test Valley and one to which a positive response should be made in the Local Plan.
- 4.22 It is concerning then, to read in the Housing 'Topic Paper' (at paragraph 8.9) that the Council's response to the challenge is not effective, and the suggestion is that simply:
- "The identified needs for specialist housing for older persons over the plan period is within the total housing need (as derived from the standard method) and not in addition to it."*
- 4.23 PPG suggests that this is not necessarily the case, and that Councils may need to consider an 'uplift' to the Local Housing Need figure (derived from the standard method) in order to meet the needs of an aging population or set a separate target. This is a matter of particular importance when there is data which suggests that the aging population of an area is at a significant level, as it is in Test Valley.
- 4.24 The Marshall Family suggests that the Council should take a proactive and positive approach to meeting the needs for older people's accommodation and identify a specific target to help meet that need (as is suggested in PPG at Reference ID: 63-006-20190626). Thereafter, the Council should give serious consideration to allocating development sites specifically to deliver older people's accommodation (as is suggested in PPG at Reference ID: 63-013-20190626).
- 4.25 Considering Romsey specifically, our analysis of the GLA 2021-based Population Projections, suggest that in 2020 14% of the population was aged over 75 (over 2,800 people) and by 2040 this is set to grow to over 19% of the town's population (more than 4,600 people). There is a significant opportunity in Romsey for the Council to take a positive action and allocate sites to meet a growing need for older people's accommodation. Sites like land north of Sandy Lane, should be considered in part, for such an allocation strategy.
- 4.26 With residents to specialist later living facilities typically moving within a 10km / 6 mile area, Romsey is well placed within the Southern Test Valley area and wider South Hampshire area to provide such accommodation within close proximity to key facilities and services, and locally based employees.
- 4.27 Finally, on this matter, The Marshall Family notes that the Council's proposed approach to managing the growing challenge of it aging population and their specific housing needs is as follows (taken from the Housing 'Topic Paper,' paragraph 8.10):



*“In addressing the housing needs of older people the draft Local Plan Policy HOU5 supports the provision of specialist residential accommodation and facilities where appropriate. This may include the provision of extra care accommodation, assisted living or other forms of retirement housing to be let or sold on the open market.”*

- 4.28 A criteria-based policy, as proposed at HOU5 is not sufficiently positive to meet a significant and growing local and national need. Moreover, the Council should not simply rely on its large site allocations to meet this need, the Council should seek to actively allocate sites for older people's accommodation.

**Meeting the housing requirement (Policy SS6)**

- 4.29 As is set out in response to proposed Policy SS3, The Marshall Family does not believe that the Local Plan includes a sufficiently high housing requirement. However, the principle of proposed Policy SS6 is supported, it should simply include more site allocations, which can be delivered across the plan period.
- 4.30 The Marshall Family notes that Policy SS6 is supported by *Table 3.3: Housing Requirement and Supply*. The Marshall Family notes that this table suggests that there is a projected housing supply of 12,415 homes, against a target of 11,000. This suggests that there is 'headroom' or a buffer of some 1,415 homes, which is equivalent to around 12.9%. Whilst having a buffer is supported by Gleeson, because it allows the plan to have some flexibility, the table and its supporting trajectory document raise some concerns. Moreover, the fact that there is a high 'buffer' suggests that there is a greater capacity in Test Valley to support the delivery of more new homes.
- 4.31 On the matter of the plan period, The Marshall Family has challenged the legitimacy of the time period chosen for this by the Council. The effect of adopting the correct timeframe for the plan period (i.e., 2023/24-2040/41) would reduce the (albeit challenged) overall requirement to 9,900 (18 x 550) but it would also reduce the supply, on the Council's own figures (because completions from 2020/21-2022/23 would be removed) to 10,287. This would leave a buffer of only 3.9%.
- 4.32 The Council's rationale for including a housing supply buffer is explained at paragraph 3.100 of the Local Plan, and it is also explained that the Council would like that buffer to be 10%. So, by the Council's own measure the supply should be increased to 10,890 new homes, to be delivered between 2023/24-2040/41.
- 4.33 Land north of Sandy Lane is a site which can help the Council meets its target for a deliverable and sufficiently flexible Local Plan: It should be allocated for residential led development.
- 4.34 Another potential positive of land north of Sandy Lane, is that it is constraint free, and readily accessible. It is a discrete site, which can be delivered in a timely fashion. Cited at Table 3.3 in the Local Plan, and in the supporting housing trajectory, is the allocation at Whitenap, Romsey. This is a large site for around 1,100 new homes which has been allocated since 2016 and is yet to commence development. Our understanding is that there are challenges regarding access, including delivering a bridge over the railway, and other 'normal' infrastructure delivery delays which are experienced by developments of this size.

- 4.35 It is not clear in the trajectory exactly when at Whitenap is expected to be delivered, and The Marshall Family is not suggesting that it should not be allocated for development more that land north of Sandy Lane should *a/so* be allocated to provide housing in the short to medium term. This approach would support the Council's housing trajectory in the earliest parts of the plan period and allow it some time to work with the applicants at Whitenap to find solutions to the current infrastructure hurdles which are faced there. The same could be said of land south of Ganger Farm, which is another large site, which relies on the rest of Ganger Farm to be completed before it can be delivered. Allocating land north of Sandy Lane can provide much needed new homes, in a timely manner and take the pressure off the larger sites, allowing their proper planning and delivery alongside appropriate levels of infrastructure.
- 4.36 Finally on the subject of the housing trajectory, with the changes to the NPPF made in December 2023, the first five years of the plan, and its 'adopted' five year housing land supply need to be more robust than ever before, so that it can support and justify the Council's 'immunity' from needing to demonstrate a five year housing land supply, as set out in paragraph 76. The Marshall Family suggests that the Council should allocate land north of Sandy Lane, and other small and medium sites to increase the overall supply of new homes in the borough, and to reinforce the early parts of the housing trajectory.

## 5.0 TEST VALLEY COMMUNITIES

- 5.1 Gleeson, notes and generally supports the further articulation and greater detail given to the spatial strategy in this chapter of the Local Plan.

### **Southern Test Valley (& Romsey)**

- 5.2 Romsey is given an appropriate level of consideration in this chapter; there are several policies which seek to direct development in the town centre, and to deliver new homes on the town edges. The strategy, in principle, for Romsey should deliver sustainable development, however, as is set out in these submissions, the need for new homes is underestimated for the whole borough, and there is an opportunity at the north side of Romsey to allocate additional land for new homes, and potential some additional retail provision, or older people accommodation.
- 5.3 Land north of Sandy Lane, Romsey, should be allocated for development in addition to what is proposed, and it would clearly add to the strategy for sustainable growth at the town.
- 5.4 The Council appears to have allocated new development at two sites ("Land South of Ganger Farm" and "Land South of Bypass, Romsey") which are no more deliverable than land north of Sand Lane, and indeed in many ways are more constrained. The Marshall Family questions whether the proposed allocations are sequentially preferable to land north of Sandy Lane but for completeness, is not seeking to have these sites removed from the Local Plan.

### **Omission site: Land North of Sandy Lane**

- 5.5 As is set in the introduction to these submissions, the site is located to the north of Sandy Lane in Romsey. The land is an unrestored area of gravel working dating back



to the Second World War. The site is relatively flat with a gentle slope from north to south. There are some trees and hedges at the boundaries of the site, especially at the south along Belbins/Sandy Lane. 1.15ha of Belbins West is in use for storage and distribution, as is 0.2ha in the south-west corner of Belbins East. The site is accessed off Sandy Lane.

- 5.6 There is a farm to the north, to the west is Wynnford Industrial Park accommodating several occupiers including a timber building/fencing company and a camper van repair company. Belbins Business Park is located to the south of Sandy Lane opposite the site.
- 5.7 The site is included in the Strategic Housing and Economic Land Availability Assessment (SHELAA) under reference: **187**. The SHELAA concludes that the site is **available**, **achievable**, for development and that development should be **deliverable**.
- 5.8 The SHELAA also concludes that the site is located outside of the settlement boundary; but it is adjacent to the town of Romsey. This should not be considered a constraint to the site's suitability for development, the settlement boundary can be changed through the Local Plan drafting process, and moreover, the site's location is very sustainable. The sustainability 'credentials' of the site are further explained in the SHELAA, where it is stated that Romsey is a 'major centre' and such locations are settlements with the widest range of facilities and services in the Borough and are more accessible due to better public transport provision.
- 5.9 It is noted in the SHELAA that there could be some ecological value to the site. It is noted that there is part of the local ecological network present on the site. It is said, in the SHELAA that:
 

*"An ecological network is a group of habitat patches that species can move easily between, maintaining ecological function and conserving biodiversity. This site includes both Core Non-Statutory Areas containing "Ancient Woodlands" "All Local Wildlife Sites (SINCs)" or "Priority Habitats" and Network Opportunity Areas."*
- 5.10 There is no further detail given about the quality of the ecology on site, or which of the local non-statutory 'designations' is present. Notwithstanding this, The Marshall Family actively manages and farms the site, and suggests that ecology can be effectively managed, and effects mitigated where necessary.
- 5.11 Overall, then, the SHELAA gives a positive view of the potential developability of the site.
- 5.12 Considering the site in some more detail (as is set out in the Vision Document at **Appendix A**); it is largely unconstrained:
  - it is not subject to any special landscape or other designations. The River Test Site of Special Scientific Interest (SSSI) – at its closest point – is about 350m to the southwest of the site. The Baddesley Common and Emer Bog SSSI and Emer Bog Special Conservation Area (SAC) are both about 3.5km southeast of the site. The Mottisfont Bats SSSI & SAC is just over 5km to the northwest of the site.;

- it is located in Flood Zone 1 (land least susceptible to flooding);
  - there is existing development ranged along the south side of Belbins/Sandy Lane, which makes development on the north side a logical complement to the existing pattern of development; and
  - preliminary transport highways assessment confirms that there are no insurmountable highway constraints.
  - There are no listed buildings – or other statutory heritage assets – on the site, or in close proximity. The closest heritage asset is the Grade II Park & Garden: Sir Harold Hillier Gardens and Arboretum, some 650m to the east of the site.
- 5.13 The Marshall Family also suggests that the site is very accessible. Romsey railway station is around 1.5 miles from the site, and there are regular bus services nearby too: Romsey to Winchester route 66 (nearest stop 0.3 miles), Bluestar route 36 (nearest stop 1.2 miles). Furthermore, national cycle route 24 (to Romsey railway station and various points beyond) runs alongside part of the site. There are also a range of footpaths and Public Rights of Way into Romsey town centre and also into the wider countryside.
- 5.14 The Marshall Family is disappointed then, to see the site not allocated for development. It is also disappointed to see in the Sustainability Appraisal (SA) the following conclusion (page 465):
- Site located north of the Romsey settlement boundary, does not relate well to the settlement and more associated with the open countryside to the north. Onsite constraints include TPO trees and BAP Priority Habitat which limit suitability in comparison to less constrained sites.*
- 5.15 As can be seen in the Vision Document (**Appendix A**) land north Sandy Lane is a very logical location for additional growth. It is at the least constrained edge of Romsey, when considering heritage constraints, flood risk, and landscape sensitivity. The site is adjacent to employment locations, and well related to existing residential development.
- 5.16 TPO trees and BAP Priority Habitats, are generally issues which can be managed, and if necessary mitigated, through the development management process; they should not be seen as a 'strategic' or headline reason to rule out a site.
- 5.17 It is particularly difficult to accept the conclusion for land north of Sandy Lane in the SA, where it cites comparisons with other sites. This is because the site which have been allocated are affected by potentially more serious physical constraints and matters which are 'hierarchically' more significant (i.e., statutory national designations).
- 5.18 The SA conclusions for the proposed allocations at Romsey are as follows:

***Land South of Bypass, Romsey (SHELAA154 and SA pages 485-492).***

*This site is sustainably located with good accessibility to essential services and amenities and is well related to the settlement of Romsey. Site has heritage sensitivity in relation to proximity to listed buildings, Romsey Conservation Area and the Broadlands Estate which will inform layout, form and design of development. Site also affected by noise from the Bypass Road which will inform location of development. TPO trees on the site boundary. Approximately 25% of the site is subject to surface water flooding.*

**Land at Ganger Farm (south), Romsey (SHELAA 284 and SA pages 387-396).**

Sustainably located site with good connectivity to services and amenities in Romsey. Site relates well to recent development and the existing Local Plan allocation at Ganger Farm. SINC habitat and Ancient Woodland are located on the edge of the site where appropriate buffer areas need to be provided. Site access can be achieved from Ganger Farm Lane.

- 5.19 Contrary, then, to what is suggested in the SA conclusions for land north of Sandy Lane is it not limited in its “*suitability in comparison to less constrained sites.*” This is because the proposed allocations have the potential to directly affect (or be affected by): heritage assets (listed building and a conservation area), noise, TPO, flood risk, and SINC habitat and Ancient Woodland, respectively. Land north of Sandy Lane would potentially affect many fewer natural and historic assets.
- 5.20 It is accepted that land north of Sandy Lane is further from the town centre of Romsey than the allocated sites, but there is good access for people to get to the facilities and services there. Moreover, there are employment locations close to, and along Sandy Lane, and there are other facilities at the north of Romsey. Indeed, an option for development on land north of Sandy Lane is to include new retail provision, so it could also improve the sustainability of the northern part of the town.
- 5.21 Considering the evidence in both the SHELAA, and the SA, it is illogical not to allocate Land north of Sandy Lane.

***The Vision for land north of Sandy Lane***

- 5.22 Land north of Sandy Lane has the potential to deliver a sustainable extension to Romsey that will complement the growth which is currently delivering at Abbotswood and Ganger Farm. There is the capacity for at least 300 dwellings and two exciting alternative additions: (a) is the opportunity to deliver a food store for the northern end of Romsey which can provide for the local growth and ease some traffic and parking pressure on the town centre; and (b) is the opportunity to deliver older peoples’ accommodation in comprehensively designed surroundings, which would help to meet the needs of the aging population in Romsey, and the wider Test Valley.

***Option (a): Retail needs***

- 5.23 There is a compelling retail case for introducing a mid-range foodstore to Romsey to enhance choice and competition in the town’s food shopping, and stem the current high-level of leakage out of the town:

- Test Valley's Retail Capacity Study (2018) demonstrates that there is demand, it states:  
*'Whilst Romsey town centre in general has a good convenience offer (based on current market shares), it would appear that there is a potential 'gap' in foodstore provision... we consider that there is potential to improve the quality and scale of the town's convenience offer. This can be achieved by introducing a mid-range supermarket, subject to market demand'*
- Romsey leaks 68% of its convenience expenditure, with Eastleigh and Southampton attracting high numbers of Romsey residents.
- In terms of comparison, the town leaks 88% of expenditure.
- Existing Aldi and Waitrose stores are performing well – also an indicator of latent capacity.
- Whilst the capacity study does not identify significant levels of need for new convenience floorspace, the analysis is based on a constant market share, i.e. existing unacceptable levels of leakage.

5.24 Considering this recent evidence of food shopping patterns there is a compelling retail impact case to support the new housing coming forward and to increase trade retention for Romsey and overall market share.

5.25 A new foodstore would also provide additional local employment.

5.26 Sandy Lane represents an accessible out of centre location, well related to the housing coming forward in the northern part of the town.

***Option (b): Housing needs of older people***

5.27 As The Marshall Family has explained, in response to the question of overall housing need in Test Valley, the GLA 2021-based Population Projections, underpinned by recent demographic trend, suggest that in 2020 just over 10.2% of the population in Test Valley was aged over 75 (around 13,100 people) and by 2040 this is set to grow to nearly 14.4% of the borough's population (more than 21,600 people). The Council's housing evidence base outlines that over the plan period there is need for around an additional 2,242 specialist older person accommodation units.

5.28 This reflects the situation across the UK, of an aging population, but it is a significant challenge for Test Valley and one to which a positive response should be made in the Local Plan.

5.29 Considering Romsey specifically, our analysis of the GLA 2021-based Population Projections, suggest that in 2020 14% of the population was aged over 75 (over 2,800 people) and by 2040 this is set to grow to over 19% of the town's population (more than 4,600 people). There is a significant opportunity in Romsey for the Council to take a positive action and allocate sites to meet a growing need for older people's accommodation.

5.30 Romsey, with a good range of existing key facilities and services along with locally based employees, is well placed within the Southern Test Valley area and wider South Hampshire area to provide such accommodation. The employment potential provided

by care homes, and other forms of older people's accommodation should also not be overlooked.

- 5.31 Sites like land north of Sandy Lane, should be considered in part, for an allocation strategy, which directs older people's accommodation to sustainable and accessible locations.

**Policy SA1: Romsey Town Centre**

- 5.32 The Marshall Family generally supports proposed Policy SA1, and the Romsey Town Centre Masterplan.
- 5.33 The Masterplan has the potential to maintain and enhance town centre vitality and vibrance to the benefit of the existing community and new residents. Any proposals at land north of Sandy Lane would complement activities in Romsey Town centre, and would provide additional new residents to help increase footfall in shops and restaurants etc.
- 5.34 Any potential retail component of land north of Sandy Lane would not compete with the town centre, because there is pent up demand (and economic leakage). On the contrary, any retail provision north of the town centre would help to retain money spending in the town.

**Policy SA4: Housing Allocation: Land South of Ganger Farm**

- 5.35 The Marshall Family does not object to the proposed allocation of "Land South of Ganger Farm." However, the fact that the proposed allocation requires a buffer to ancient woodland, a sequential flood risk assessment, and ecological mitigation, demonstrates how constrained the site is. This cannot make it sequentially preferable to land north of Sandy Lane, and furthermore it is potentially reliant on the completion of other development in the area so the timing for its completion is not clear.
- 5.36 Land north of Sandy Lane should be allocated for development alongside this site.

**Policy SA5: Housing Allocation: Land South of Bypass, Romsey**

- 5.37 The Marshall Family does not object to the proposed allocation of "Land South of Bypass, Romsey." However, the fact that the proposed allocation requires a significant Heritage Impact Assessment, noise mitigation, and ecological mitigation, demonstrates how constrained the site is. This cannot make it sequentially preferable to land north of Sandy Lane
- 5.38 Land north of Sandy Lane should be allocated for development alongside this site.

**6.0 THEME BASED POLICIES**

**Climate Change**

- 6.1 It is right that matters of climate change and carbon management are highlighted and engaged with, where they can have an impact. However, The Marshall Family questions the appropriateness of a Local Plan as the vehicle to engage with climate change and carbon management, when what is most acutely needed is a

comprehensive, and consistent approach to sustainable development, which is best led by Building Regulations.

**Policy CL1: Countering Climate Change**

- 6.2 Proposed Policy CL1 is seeking to direct development proposals in minimising the carbon and energy impacts of their design and construction and be designed to improve resilience to the anticipated effects of climate change. The Marshall Family agrees that this is a vital approach to development management and must lead to more energy efficient homes (and other buildings) and pave the way to reducing carbon emissions. However, this is a clear example of an occasion where Government is seeking to improve standards across the whole country through building regulations.
- 6.3 Building regulations will provide a consistent mechanism for the improvements sought through proposed Policy CL1 which will support the continued delivery of new homes.

**Policy CL3: Sustainable Buildings and Energy Use**

- 6.4 Proposed Policy CL3 broadly requires all new development to use no fossil fuel energy on site, meet set requirements on how much heating the building will need and generate the same amount of renewable energy (preferably on-plot) as they demand over the course of a year, demonstrated through an energy statement.
- 6.5 The introduction of additional local net zero commitments is introduced to 'bridge a policy gap' to address the delivery of net zero carbon.
- 6.6 The Marshall Family considers that the approach to achieving zero carbon set out in the Local Plan conflicts with the Written Ministerial Statement (WMS) titled 'Planning - Local Energy Efficiency Standards Update', published on 13th December 2023, which establishes that the 'Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations' The Statement further mentions that planning policies proposing to go beyond the current or planned building regulations should be rejected at examination if they are not supported by a well-reasoned and robustly costed rationale that ensures that development remains viable.
- 6.7 The Marshall Family urges the Council to review the draft policy in light of the WMS and ensure consistency with the proposed national standards.
- 6.8 The Marshall Family raises no objection, however, with the principle of the need to manage embodied carbons. The Marshall Family welcomes the fact that there are no 'targets' introduced in regarding embodied carbons, in the policy, but it does question how the Council proposes to assess the feasibility of demolition or re-use of various buildings (in this regard).

**Policy CL4: Water Use and Management**

- 6.9 The Marshall Family notes that the Council is seeking to pursue an enhanced water efficiency standard of 100l/p/d in new development. It is accepted that Hampshire is an area of water stress, and that efficiency standards should be as good as can be achieved in line with building regulations. However, it is inappropriate at this stage to require development to meet unadopted "potential" water efficiency standards.



- 6.10 The Marshall Family suggests that the Council keeps this proposed policy under review until such time that the building regulations, and associated Government policy, allow for the adoption of the new standard. Until that time, the Council should retain the current 'enhanced' standard of 110l/p/d.
- 6.11 The Marshall Family is concerned that the drafting of proposed Policy CL4 includes a requirement on new development to manage sewerage capacity.
- 6.12 The Marshall Family believes it to be the responsibility of water companies to provide, and maintain, adequate sewerage infrastructure, and in effect new development has the 'right to connect.'
- 6.13 The Councils need to set out more clearly the work it has done in partnership with Southern Water and the Environment Agency on the matter of sewerage, and how the three parties are effectively planning for the future demand on the sewerage network. It is not for developers to retrospectively deliver sewerage infrastructure as part of development proposals.

### **Our Communities**

- 9.1 The Marshall Family would support the idea of an overarching and joined up infrastructure policy provided that policy is applied proportionately and equitably to all forms of development i.e., housing and employment Infrastructure delivery. It also needs the Council and the highway authorities to come with, and cost, a realistic and achievable Infrastructure, Transport and Connectivity Plan – absent such a plan there will continue to be issues going forward around the timely delivery and appropriate funding of new, major development across borough.

### **Policy COM1: Delivering Infrastructure**

- 6.14 The Marshall Family recognises and acknowledges the importance of delivering infrastructure alongside new development. Where that infrastructure is necessary in planning terms, and appropriate and proportionate to the development (i.e., it meets the test of development obligations) then this policy is supported.

### **Ecology and Biodiversity**

- 6.15 The natural environment: its conservation and enhancement, is at the heart of the planning system. This conservation and enhancement should of course be balanced with the social and economic pillars of sustainability, so whilst this part of the Local Plan is vitally important is most not overbear on the delivery of development.

### **Policy BIO1: Conservation and Enhancement of Biodiversity and Geological Interest**

- 6.16 The Marshall Family notes the contents of proposed Policy BIO1 and welcomes the approach which the Council is taking to protecting and enhancing biodiversity and geodiversity.
- 6.17 The policy reflects the NPPF at paragraph 185 – 188, and identifies the appropriate hierarchy of protected sites, and the sequential approach that when:

*“...harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.”*

### **Policy BIO3: Biodiversity Net Gain**

- 6.18 The Marshall Family also welcomes the Council's decision to adopt the minimum 10% Biodiversity Net Gain (BNG) requirement set out in the Environment Act 2021, and not seek to set a target above this level. This is not to say that 10% cannot be exceeded, but the Council is right to be pragmatic and not stifle development opportunities with additional arbitrary targets.

### **Design**

- 6.19 The Marshall Family recognises the importance of quality design and place making, indeed the NPPF contains an entire chapter (12) on the subject. Paragraph 131 of the NPPF explains that:

*“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”*

- 6.20 However, an element of design should continue to be reserved for the Neighbourhood Plan level which can achieve positive engagement in the delivery of development, in the production of site-specific design codes.
- 6.21 Moreover, because design is often reflective of site-specific circumstances (as advocated by paragraph 134 of the NPPF), design codes can sometimes be prepared by landowners and developers.

### **Policy DES1: Delivering of Sustainable and High-Quality Design**

- 6.22 Proposed Policy DES1 sets out the broad themes and considerations for designing a development scheme. The Marshall Family generally agrees with the principles, which chime very much with its own approach to land promotion and development, as can be seen in the Vision Document for land north of Sandy Lane (Appendix A to these submissions).

### **Housing**

- 6.23 The Marshall Family highlights again that the overall housing requirement proposed in the Local Plan could go much further in helping to meet the needs of the communities across the Borough. The Marshall Family is ready and able to demonstrate that a range of quality and affordable homes can be delivered at land north of Sandy Lane, which would help the Council going further in meeting the needs of its local community and securing a more robust development trajectory for the Local Plan.



**Policy HOU1: Affordable Housing**

- 6.24 Proposed Policy HOU1 states that in seeking to meet the identified needs for affordable housing the council will negotiate on the basis of sites of 15 or more delivering 40% affordable housing, and sites of 10 to 15 units delivering 30% affordable housing.
- 6.25 The decision to set out a negotiating starting point in the plan stems from the viability evidence which suggests that there is no uniform level of affordable housing provision where it can be said most schemes are viable. As the Council will be aware the NPPF and PPG both seek to limit the extent to which negotiation is required as a result of local plan policies. As such a local plan that relies on a negotiation to secure the delivery of its development requirements is unlikely to be soundly based. Given that 40% is challenging for a significant number of developments (aside from those in the highest value areas) the Council will need to consider whether a differential rate between value areas or at the very least between greenfield and brownfield land would be possible.
- 6.26 If a specified, varied rate is not possible and the council considers it necessary to rely on negotiation the situation must be made far more explicit in the Local Plan. This will signpost to decision makers that a lower level of affordable housing provision is acceptable and not the exception, as referred to in paragraph 5.358 of the Local Plan.
- 6.27 Allowing a smaller contribution to Affordable Housing, through negotiation, is consistent with paragraph 58 of the NPPF, however, the council considers it necessary to depart from this approach and as such must clearly state its position both in the policy and the supporting text. This will ensure that where development comes forward with affordable housing provision below the 'targets' set out in the plan, decision makers will not seek to prevent it on the basis of paragraph 58 of the NPPF.
- 6.28 Finally, it is not clear why the Council has set a site size threshold for development of between 10 and 14 units that is lower than that for major development, the threshold set out in paragraph 65 of the NPPF. If the Council is to include a site size threshold this must be consistent with the definition of major development of 0.5 ha.

**Policy HOU5: Provision of Housing to meet our needs**

- 6.29 Whilst the Marshall Family welcomes what is a relatively flexible approach to housing mix it is not justified for the council to base considerations of mix on the needs of newly formed households. Whilst the needs of newly formed households should be considered there will be existing households that might have a need for a larger home as a family expands, or indeed smaller home as they seek to downsize.
- 6.30 By restricting the consideration of housing mix to just newly formed households there is potential for the needs of current households to be dismissed. The Marshall Family suggests that part b is amended to:

*"a mix of homes by size (including number of bedrooms), type and tenure, which take account of the composition of the current housing stock, identified needs and other appropriate local evidence on needs and the supply of new homes."*

- 6.31 Proposed Policy HOU5 also includes the Council's policy supporting the housing needs of older people. The policy requires major developments to consider the needs of those requiring specialist accommodation. This is insufficient and is not a positive approach to meeting the specialist accommodation needs of older people.
- 6.32 First, The Marshall Family strongly suggests that housing needs of older people, are clearly identified in the plan, and an annualised target is included either the policy or the supporting text. It is Important for decision makers to be aware of the need for such homes and for the delivery of such homes to be monitored against these needs.
- 6.33 Second, the Council should include: (a) site allocations to approach meeting the identified need, (b) a positively worded policy in the local plan that supports the provision of specialist accommodation for older people, and (c) a policy (or policy criterion) which explains that where shortfalls are identified the Council will implement a presumption in favour of such development.

#### **Policy HOU6: Residential Space Standards**

- 6.34 The Marshall Family was unable to find any evidence to support the requirement for all residential development to meet the nationally described space standards, as required by national policy. If the Council wants to implement these standards, then it will need to provide robust evidence that these standards are needed and will not impact on the viability of development of the affordability of housing in the borough.

#### **Transport and Movement**

- 6.35 Transport infrastructure delivery and new development go hand in hand, and the Local Plan is at the helm of directing when and where both can be delivered in a sustainable manner. However, there are greater housing and employment needs in the borough than articulated in the Local Plan, so more work is required to ensure the correct level of development and infrastructure is therefore planned.

#### **Policy TR1: Active and Sustainable Travel**

- 6.36 The Marshall Family broadly support proposed Policy TR1 for active and sustainable travel, however, it should refer to the overall spatial strategy which includes both locating and promoting development that can reduce the need to travel and promote a genuine choice of transport modes, whilst also investing appropriately in supporting infrastructure.
- 6.37 Gleeson considers that a successful strategy utilising all tiers of the settlement hierarchy, and of co-locating new homes and jobs can make a significant contribution to producing a sustainable and active transport network, reducing the need to travel long distances.
- 6.38 Accordingly, a key part of transitioning towards a sustainable transport network, whilst maintaining sustainable growth, is locating development adjacent to existing or proposed major routes that can accommodate sustainable forms of travel – including cycle lanes, bus routes or by train. Including at urban edges, at locations such as land north of Sandy Lane.

**Policy TR3: Parking Standards**

- 6.39 Proposed Policy TR3 requires development to be in accordance with standards set out in the Council's adopted parking standards. This would be unsound as it seeks to confer the status of a local plan policy on guidance published outside of the plan making process. The Council can provide guidance in SPD, but it cannot require development to accord with it. If the Council wishes to require specific standard they should be included in the local plan, if not the policy should be amended to state that development should have regard to the adopted parking standards.

**7.0 CONCLUSION**

- 7.1 The Marshall Family is pleased to have had the opportunity to comment on the emerging Local Plan. There are some matters of detail, touched upon in these submissions that will need the Council's attention before the next stage of consultation.
- 7.2 Land north of Sandy Lane, Romsey (SHELAA site reference 187) is 'available,' and 'achievable,' for development with a residential development capacity of at least 300 dwellings. That development is 'deliverable' and a 'suitable,' and sustainable site. It therefore has significant potential to become a development site allocation through the emerging Local Plan.
- 7.3 Proportionate development on the edge of Romsey would help support existing services and facilities and improve the availability of affordable housing. The site is well related to the existing settlement and would constitute sustainable development in accordance with the NPPF.
- 7.4 Overall, in planning to meet the future objectively assessed housing development needs of Test Valley Borough Council to 2040 (or 2041), the Council should recognise the merits of the potential for additional sustainable, residential-led development across the district, especially in the most sustainable locations including at the edge of Romsey, for the reasons set out above.

**APPENDIX A: VISION DOCUMENT - LAND NORTH OF SANDY LANE**

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Response on behalf of the Marshall Family.



Land North of Sandy Lane, Romsey

**Test Valley Local Plan Regulation  
18 (Part 2) Consultation Response  
Document**

April 2024

**Carter Jonas**



LAND NORTH OF SANDY LANE HAS THE POTENTIAL TO DELIVER A HIGH QUALITY AND SUSTAINABLE EXTENSION TO ROMSEY WHICH COMPLEMENTS THE GROWTH AT ABBOTSWOOD AND GANGER FARM. THERE IS THE CAPACITY FOR AT LEAST 300 NEW HOMES, AREAS OF OPEN SPACE AND BIODIVERSITY IMPROVEMENTS.

THE SITE CAN ALSO DELIVER A FOOD STORE, SERVING THE NEW COMMUNITY AND EXISTING RESIDENTIAL AREAS IN NORTH ROMSEY, EASING TRAFFIC AND PARKING PRESSURE ON THE TOWN CENTRE.

Carter Jonas

Gleeson Land Ltd: Land North of Sandy Lane, Romsey, Test Valley

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This document has been prepared and checked in accordance with ISO 9001:2000.





Fig 01: View of existing access to the Site from Sandy Lane

## 1.0 Introduction

- 1.1 Purpose of the Document
- 1.2 Document Structure



## 1.1 Purpose of the Document

This document has been prepared by Carter Jonas LLP on behalf of Gleeson Land Ltd to promote land off Sandy Lane as a sustainable and logical residential extension to Romsey, and is submitted to Test Valley Borough Council in response to its Local Plan regulation 18 (Part 2) consultation exercise.

The document will:

- Confirm that the Site is available, suitable and deliverable and should be considered for development.
- Illustrate the process that has led to the development proposal and explain the design principles and concepts that have been applied.
- Introduce the concept masterplan and explain the rationale behind its development.
- Set out high level vision and broad design principles.
- Enable positive engagement with the local community and Test Valley Borough Council.



1. Romsey Town Centre  
2. New housing at Abbotswood  
3. Sir Harold Hillier Gardens

Fig 02: Images in and around Romsey

## 1.2 Document Structure

### Section 1.0: Introduction

Describes the purpose of the document, content and scope.

### Section 2.0: Context

Provides an introduction to the Site and local community facilities in Romsey.

### Section 3.0: Romsey: Direction for Growth

This section provides an explanation of the future of growth in Romsey, as well as justification for food retail on the Site.

### Section 4.0: Technical

Overview of technical considerations, that inform the design process.

### Section 5.0: Design

Setting out the vision process and design principles before introducing the concept masterplan. Explains the various components of the masterplan, such as the open space strategy, transport and land use, as well as more detailed development principles. Provides a summary of the proposals and recommendations.

## 2.0 Context

- 2.1 The Site
- 2.2 Community Facilities



## 2.1 The Site

The Site is located to the north of Sandy Lane in Romsey. The land is an unrestored area of gravel working dating back to the Second World War which, on the basis of the definition in the National Planning Policy Framework ("the Framework"), makes it previously developed land.

The Site is relatively flat with a gentle slope from north to south. There are some trees and hedges at the boundaries of the Site, especially at the south along Belbins/Sandy Lane. 1.15ha of Belbins West is in use for storage and distribution, as is 0.2ha in the south-west corner of Belbins East. The land is accessed off Sandy Lane.

There is a farm to the north, which also uses this access. We understand however that our client has a right of way over a length of the access track and that there may be scope to extend that right further. Nonetheless, an access to the farm to the north will need to be maintained.

To the west is Wynford Industrial Park accommodating several occupiers including a timber building/fencing company and a camper van repair company. Belbins Business Park is located to the south of Sandy Lane opposite the Site.

There has been a significant amount of residential development in Romsey over the past 10 years, including Abbotswood to the south of Sandy Lane.



1. View along Sandy Lane  
2. Belbins Business Park  
3. Kitchen Cafe and Nursery

Fig 03: Images of neighbouring sites/ facilities



Fig 04: Site location plan

## 2.2 Community Facilities

Romsey is identified as a 'Major Centre' in the Local Plan Settlement Hierarchy. Major Centres are settlements with the widest range of facilities and services in the Borough and are more accessible due to better public transport provision.

-  **Food stores: Convenience**

  1. Co-op: Abbotswood Common Rd
  2. Co-op: Warren Gardens
-  **Food stores: Superstore**

  3. Waitrose: Alma Rd
  4. Aldi: The Hundred
-  **Shops/services**

  5. A range of shops and other services in Romsey town centre
-  **Primary schools (nearest)**

  6. Cupernham Infant School
  7. Romsey Primary School and Nursery
  8. Braishfield Primary School
-  **Secondary schools**

  9. The Romsey School
  10. Stroud School
  11. The Mountbatten School
-  **Health facilities**

  12. GP surgeries in Romsey town centre
  13. Romsey Hospital
-  **Community facilities**

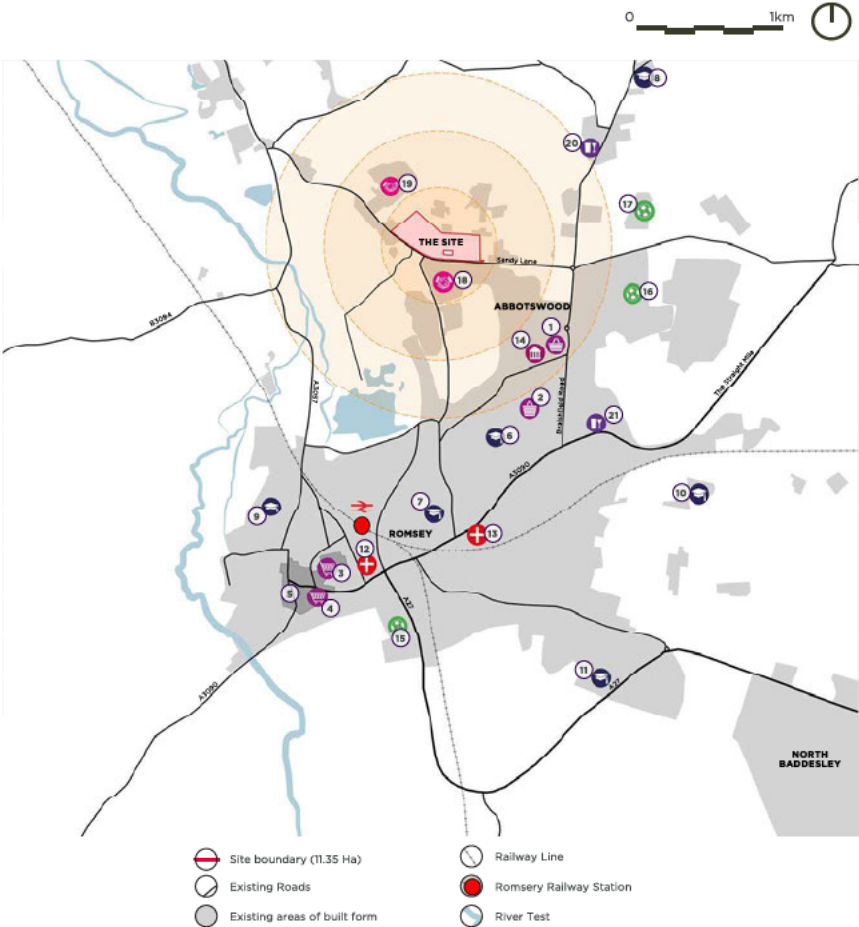
  14. Abbotswood Community Centre
-  **Leisure facilities**

  15. Romsey Rapids Sports Complex
  16. Ganger Farm Sports Centre and allotments
  17. Sir Harold Hillier Gardens
-  **Local job opportunities**

  18. Belbins Business Park
  19. Wynford Business Park & Yokesford Hill Industrial Estate
-  **Public Houses (nearest)**

  20. The Dog & Crook: Crook Hill
  21. The Hunters Inn: School Road

Fig 05: Community Facilities Plan



## 3.0 Romsey: Directions for Growth

- 3.1 Growth in North Romsey
- 3.2 Option A: With Retail
- 3.3 Option B: With Care Accommodation



### 3.1 Growth in North Romsey

Romsey is identified as a Major Centre in the Test Valley BC Adopted Local Plan.

As shown on figure 06, areas to the west of the town are constrained by Flood Zones 2 and 3, with a high risk of flooding from the River Test.

Areas to the south of the town have already been explored for growth, with the Whitenap urban extension having been allocated for development. The Broadlands House listed Park and Garden constrains growth to the south west of the town. The area designated as a "Local Gap" between Romsey and North Baddesley to prevent coalescence between the two settlements, also prevents this area from being considered for development.

Abbotswood and the Ganger Farm Site have extended the settlement in a northerly direction. Therefore the subject site across Sandy Lane represents the next logical extension for Romsey's growth.

- Site boundary (11.35 Ha)
- Existing built form
- Existing roads
- Romsey Railway Station
- Areas within Flood Zone 3
- Broadlands House
- Site of importance for nature conservation (SINC)
- Allocated sites
- Existing areas of woodland
- Local Gap (Policy E3) area

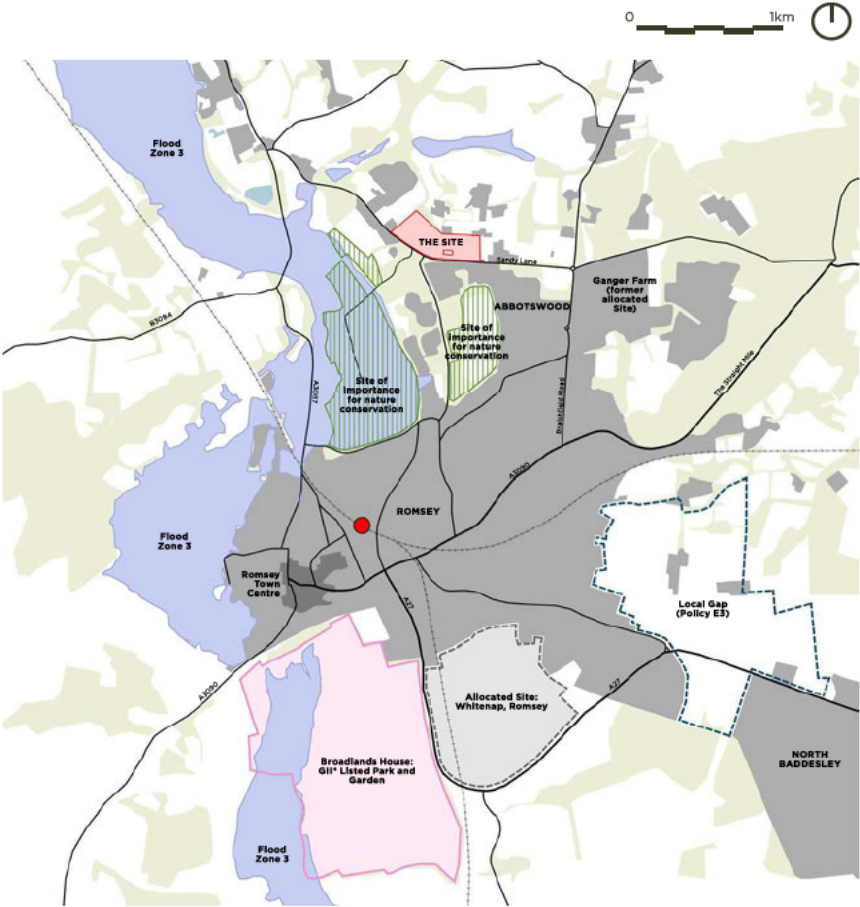


Fig 06: Directions for Growth Plan

3.2 Option A: With Retail

Although Romsey is well served by local amenities and facilities, the majority of these are located close to or in the town centre, towards the south of the settlement.

Recent growth at Ganger Farm and Abbotswood has increased the number of residents in the northern part of Romsey, with the only retail addition being a convenience Co-operative at Abbotswood. A second Co-operative at Warren Gardens serves the eastern part of Romsey.

There is a compelling retail case for introducing a mid-range foodstore to Romsey to enhance choice and competition in the town's food shopping, and stem the current high-level of leakage out of the town:

- Test Valley's Retail Capacity Study (2018) demonstrates that there is demand. It states: 'Whilst Romsey town centre in general has a good convenience offer (based on current market shares), it would appear that there is a potential 'gap' in foodstore provision. We consider that there is potential to improve the quality and scale of the town's convenience offer. This can be achieved by introducing a mid-range supermarket, 'subject to market demand'.
- Romsey leaks 68% of its convenience expenditure, with Eastleigh and Southampton attracting high numbers of Romsey residents.
- In terms of comparison, the town leaks 88% of expenditure.
- Existing Aldi and Waitrose stores are performing well – also an indicator of latent capacity.
- Whilst the capacity study does not identify significant levels of need for new convenience floorspace, the analysis is based on a constant market share, i.e. existing unacceptable levels of leakage, and little or no consideration of an increasing population in Romsey.

Considering this recent evidence of food shopping patterns new housing will support the continued vibrancy and vitality of the retail offer in Romsey.

A new foodstore would also provide additional local employment.

Sandy Lane represents an accessible out of centre location, well related to the housing coming forward in the northern part of the town.

Figure 07 shows the relative walking distances to food retail stores in Romsey. The larger stores in the town centre have a wider draw given their scale compared to the two Co-operative stores. The 'gap' in food retail provision that we have identified can be observed on this plan.

- Site boundary (11.35 Ha)
- Existing built form
- Existing roads
- Romsey Railway Station
- Existing food retail
- Indicative walking catchment area
- River Test

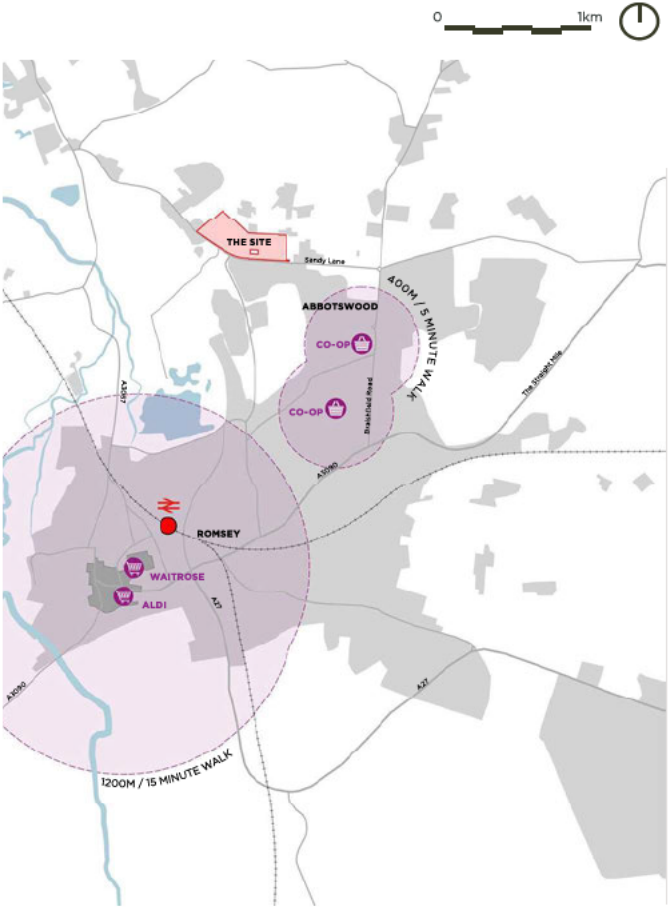


Fig 07: Food Retail Service Areas Plan

### 3.3 Option B: With Care Accommodation

**There is an aging population in Test Valley, the GLA 2021-based Population Projections, suggest that in 2020 just over 16% of the population in Test Valley was aged over 75 (around 13,100 people) and by 2040 this is set to grow to nearly 21% of the borough's population (more than 21,600 people).**

This reflects the situation across the UK, of an aging population, but it is a significant challenge for Test Valley and one to which a positive response should be made in the Local Plan.

Considering Romsey specifically, the GLA 2021-based Population Projections, suggest that in 2020 14% of the population in Test Valley was aged over 75 (over 2,800 people) and by 2040 this is set to grow to over 19% of the town's population (more than 4,600 people). There is a significant opportunity in Romsey for the Council to take a positive action and allocate sites to meet a growing need for older people's accommodation.

The employment potential provided by care homes, and other forms of older people's accommodation should also not be overlooked.

Sites like land north of Sandy Lane, should be considered in part, for an allocation strategy, which directs older people's accommodation to sustainable and accessible locations.












## 4.0 Technical

### 4.1 Technical Considerations

## 4.1 Technical Considerations

The plan opposite illustrates the key characteristics identified through the contextual and technical analysis of the Site as explained in Chapters 1.0-3.0 of this document.

- 1 Existing site access from Sandy Lane
- 2 Potential location for primary access in to the Site
- 3 Location of existing industrial / storage site
- 4 Indicative landfall across the Site, falling from c. 45m AOD in the north east to c. 40m AOD in the east
- 5 Alignment of public right of way (ref: 198/11/1)
- 6 Area of land outside of the Site boundary, currently in use as open storage
- 7 Generally open aspect to the east
- 8 Generally open aspect to the north
- 9 Mature planting along the Site's north west boundary
- 10 Block of woodland to the north of the Site
- 11 Existing mature planting along the Site's frontage with Belbins and Sandy Lane

-  Site boundary (11.35 Ha)
-  Potential access points
-  Public Right of Way (PRoW)
-  Existing built form
-  Existing trees
-  5m contour lines
-  Green edges to be enhanced
-  Sensitive edges to retained employment use
-  Open Aspect from the Site

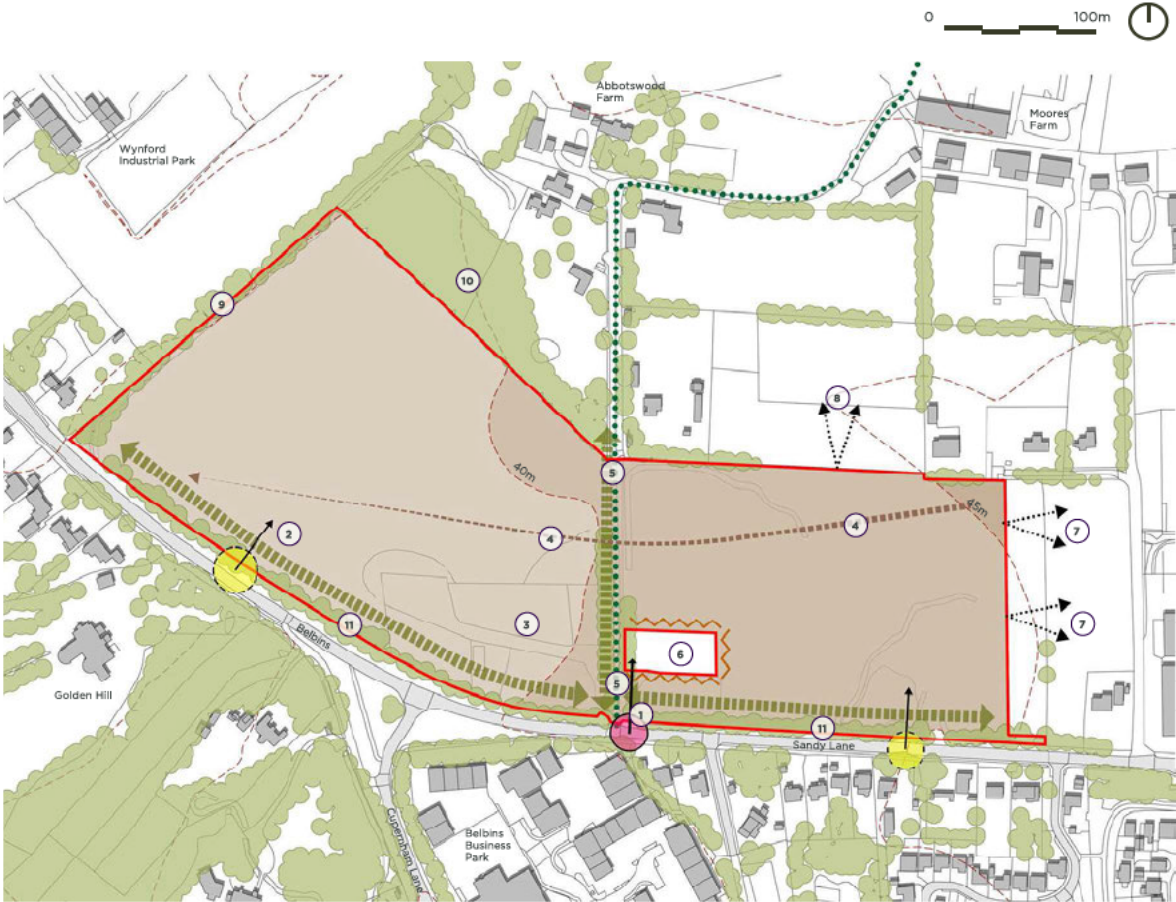


Fig 08: Technical considerations plan

## 5.0 Design

- 5.1 Vision & Principles
- 5.2 Design Rationale
- 5.3 Concept Plan - Option A: Retail
- 5.4 Concept Plan - Option B: Care Accommodation
- 5.5 Summary

## 5.1 Vision & Principles

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Land north of Sandy Lane has the potential to deliver a high quality and sustainable extension to Romsey which complements the growth at Abbotswood and Ganger Farm. There is the capacity for at least 300 new homes, areas of open space and biodiversity improvements.

The Site can also deliver a food store, serving the new community and existing residential areas in North Romsey, easing traffic and parking pressure on the town centre.

//

- 1. Strong Local Vision** - Working with Romsey Town Council and stakeholder groups to gain consensus on the nature of the development and to ensure that the vision is specific to the Site and place.
- 2. Clear Identity** - A distinctive local identity which takes character clues from Romsey.
- 3. Sustainable Scale** - Creating a neighbourhood which can harbour close knit communities, with local facilities within easy walking/cycling distance.
- 4. Well Designed Place** - A sustainable extension to Romsey, with provision of community-focussed open space on site and direct access to an expansive network of open spaces.
- 5. Great Homes** - Provision for new homes, which will be across a range of types, sizes and tenures. Committing to this diversity of dwelling types can assist with creating a mixed and balanced community.
- 6. Food Store** - There is an opportunity for a new retail food store as part of the development mix as the location is suitable for this use type.
- 7. Accessibility** - Ensuring accessibility for all is at the heart of the masterplan. Integrating pedestrian and cycle infrastructure to streets and open spaces, to encourage more active lifestyles and reduce the reliance on the private car.



Fig 09: Vision images

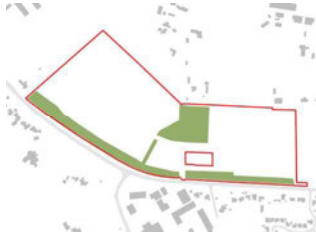
## 5.2 Design Rationale

The plans shown on this page demonstrate key design principles which underpin the concept plan presented at section 5.3. These have been driven by our understanding of the physical site constraints, site opportunities and technical assessments undertaken to date.



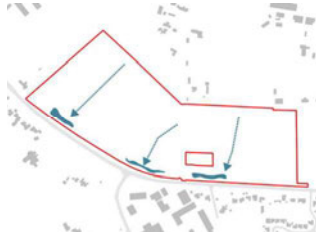
### 1. Respond to Existing Vegetation

Respond to the existing mature vegetation, and identify potential landscape connections that could be made. New planting could be introduced in the eastern part of the Site to screen views to adjacent sites.



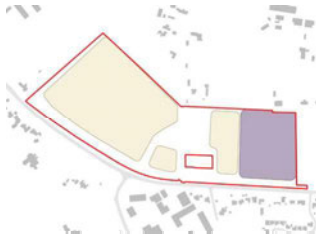
### 2. Create Open Spaces

Connect the areas of existing and proposed vegetation and create a network of open spaces, particularly along the Site's southern boundary along Sandy Lane and Belbins.



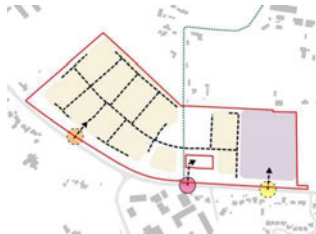
### 3. Manage Surface Water

Create areas for surface water attenuation that work with the Site's topography. There is the potential for attenuation areas in the open space along the southern boundary.



### 4. Define the Land Uses

Identify a potential split on the Site to provide a future food retail store and residential use.



### 5. Co-ordinate Access & Movement Routes

Create an access strategy which allows the food retail store to be accessed and serviced independently from the residential areas, and provide a legible network of residential streets to allow direct access to new dwellings. The existing access to the employment use from Sandy Lane, and the public right of way through the Site to Abbotswood Farm should both be retained.

- Site boundary (11.35 Ha)
- Vegetation
- Open space
- Surface water attenuation
- Residential land use
- Food retail land use
- Potential street alignment
- Access to residential
- Access to food retail

Fig 10: Design Rationale Diagrams



### 5.3 Concept Plan - Option A: Retail

The high level concept plan illustrates a potential development zone and mix of uses across the Site area, including food retail and residential.

- 1 Potential dedicated access to the retail store from Belbins
- 2 Potential access to the residential part of the Site
- 3 Potential pedestrian and cycle access to the proposed food retail store
- 4 Indicative location of food retail store building
- 5 Location for children's play
- 6 Area for surface water attenuation
- 7 Green edge retained and enhanced along the Site's boundary with Belbins
- 8 Central area of open space
- 9 Existing access to the retained employment use from Sandy Lane

- Site boundary (11.35 Ha)
- Primary access
- Public Right of Way (PRoW)
- Residential development
- Proposed attenuation
- Proposed trees
- Existing vegetation
- Proposed footpath
- Contour
- Primary highway
- Shared surface
- Secondary highway / edge lane
- Key building frontage
- Key building
- Children's play area
- Food retail store

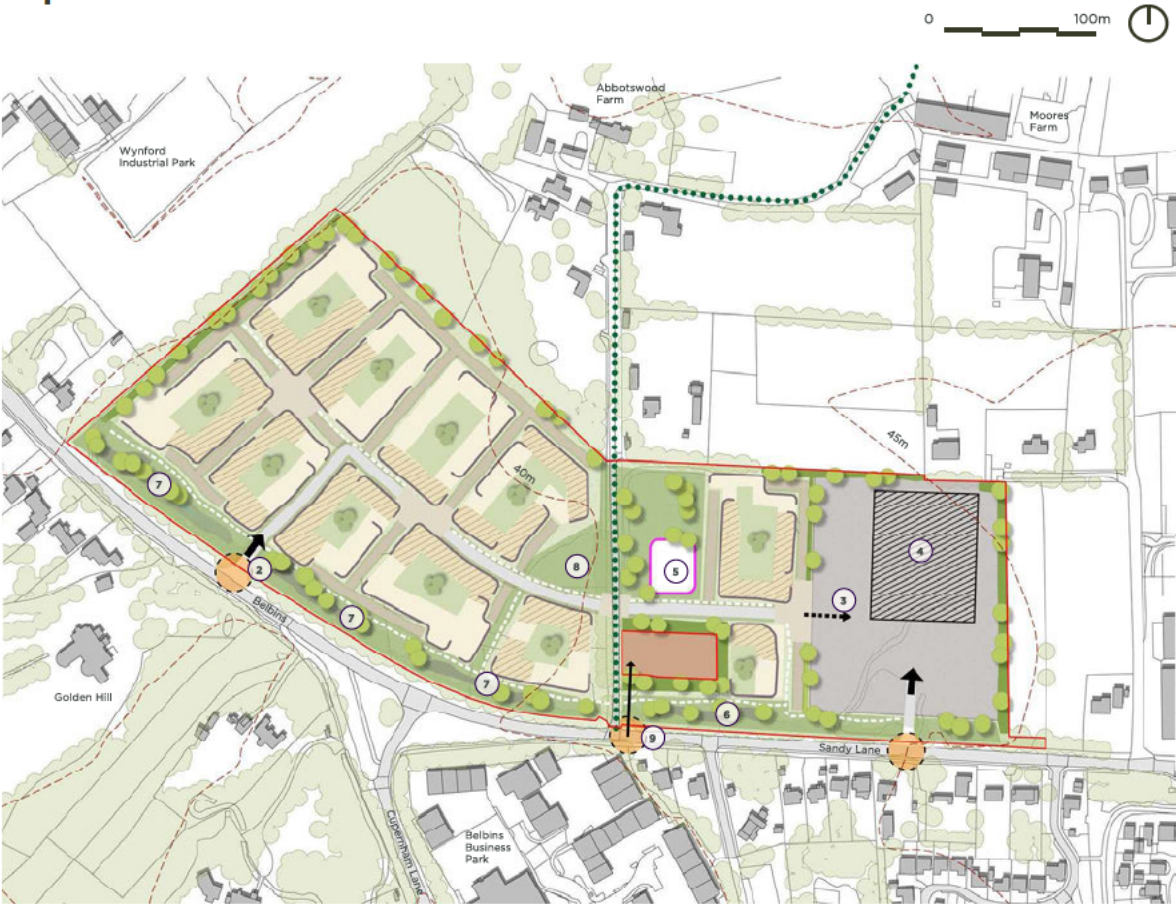


Fig 11: Concept plan - Option A: Retail



## 5.4 Concept Plan - Option B: Care Accommodation

The high level concept plan illustrates a potential development zone and mix of uses across the Site area, including care accommodation.

- 1 Potential access to the care accommodation from Belbins
- 2 Primary access to the residential part of the Site
- 3 Indicative care accommodation parcel
- 4 Area for surface water attenuation
- 5 Green edge retained and enhanced along the Site's boundary with Belbins
- 6 Central area of open space
- 7 Existing Public right of Way (PRoW) retained
- 8 Proposed footpath links across the Site.

- Site boundary (11.35 Ha)
- Primary access
- Secondary access
- Public Right of Way (PRoW)
- Residential development
- Extra care accommodation
- Proposed attenuation
- Proposed trees
- Existing vegetation
- Proposed footpath
- Contour
- Primary highway
- Shared surface
- Secondary highway / edge lane
- Key building frontage
- Key building

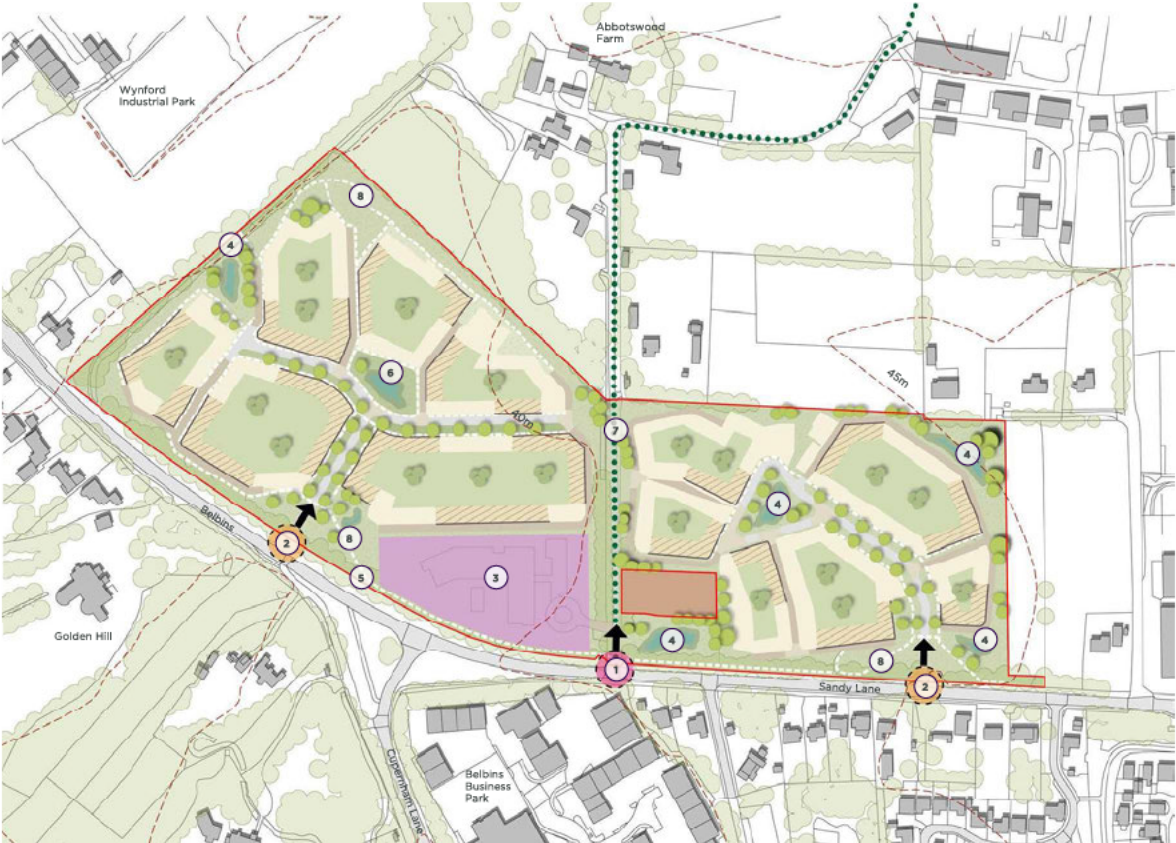


Fig 12: Concept plan - Option B: Care Accommodation

## 5.5 Summary

### Land north of Sandy Lane is:

- Available, now;
- Suitable for development; and,
- Able to deliver a sustainable extension to Romsey.

Proposals presented in this document will complement the growth which is currently being delivered at Abbotswood and Ganger Farm. There is capacity for at least 300 new market and affordable homes and an opportunity to deliver a food store at the northern end of Romsey, which can provide for local growth and ease traffic and parking pressure in the town centre.

Our client would welcome the opportunity of working with Test Valley Borough Council and other stakeholders to deliver a mixed use scheme as described on this brownfield site.



Fig 13: Infographic



Carter Jonas

