

Local Plan Representations
Response to Test Valley Draft Local Plan 2040
Regulation 18 Stage 2
Packridge Farm, North Baddesley

April 2024

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Persimmon Homes (South Coast) Limited (Fareham)

Our reference

PERS3019

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1. Introduction

- 1.1 These representations have been prepared to respond to the Test Valley Draft Local Plan 2040 Regulation 18 Stage 2 on behalf of our client Persimmon Homes (South Coast) Limited.

Purpose of these Representations

- 1.2 Test Valley Borough Council (hereafter referred to as 'the Council') are preparing a new Local Plan and are undertaking a Regulation 18 Part 2 consultation (hereafter referred to as 'the Reg 18 Plan') to seek views on the main issues that the plan will need to address.
- 1.3 Our client has land interests at Packridge Farm, North Baddesley and offers the significant potential to deliver around 170 homes and related Suitable Alternative Natural Green Space (SANG), open space and recreational facilities. Development of the site would represent sustainable development to meet the housing needs identified by the Council and wider needs in neighbouring authorities.
- 1.4 These representations are supported by:
- A Concept Masterplan, prepared by Turley at Appendix 1; and
 - A Site Deliverability Statement, prepared by Persimmon Homes and Turley at Appendix 2.

2. Site Overview

2.1 This section provides a brief description of the site and the site context.

Packridge Farm

2.2 The site is located immediately to the south-west of the built-up area boundary of North Baddesley as currently defined in the adopted Test Valley Borough Revised Local Plan (2016). The site itself currently consists of agricultural land. The site is bound by Hoe Lane to the north, a residential lane, Rownhams Lane to the east and Packridge Lane to the south. Rownhams Lane includes a cycleway extending along the eastern boundary, and bus stops are located north of the junction with Packridge Lane.

2.3 The site broadly slopes from the south-west to the north-east of the site, though there is a ridge that extends close to the northern set of two electric powerlines that cross the site east to west in approximately the centre of the site. From this ridge, the land slopes northward toward Hoe Lane. The existing farm is currently accessed by a main access track from Packridge Lane to the south. There is an additional access gate along Rownhams Lane to the east.

2.4 There are a number of boundary trees along the north and eastern boundaries which provide some screening of the site, however there is some visibility at winter months. These do not appear to be protected by a Tree Preservation Order (TPO). Given the location of these trees adjacent to Hoe Lane and Rownhams Lane, it is likely the majority will be highway trees.

2.5 The site is subject to the following constraints and opportunities:

- The Site is located in Flood Zone 1 according to the Government's flood risk map for planning and is therefore considered to be at low risk of fluvial flooding. The majority of the site is also considered to be at very low risk from surface water flooding, although part of the southern area of the site is at low to high risk of surface water flooding. It is noted that this area of the site is not proposed for residential development and instead would comprise open space / amenity land as noted in Section 4 – Site Opportunity.
- The Site is itself not subject to any international or national designations for biodiversity value according to DEFRA's Magic website. However, the site is located approximately 1.8 km to the south of the Emer Bog SAC and 2.2km from the Baddesley Common and Emer Bog SSSI. The site is also located adjacent to a SINC according to the proposed policies map in the Reg 18 plan and in the adopted plan.
- There are no listed buildings on or immediately adjacent the site. However, the site is located approximately 500m from the Toot Hill camp Scheduled Ancient Monument to the west of the site and a Grade II listed building to the south-west of the site.
- There are no Public Rights of Way on or immediately adjacent to the site.

Surrounding Area

- 2.6 In terms of surrounding uses, there is residential development immediately to the north of the site. There is woodland to the east and beyond this is a golf course. There is agricultural land to the west and south of the site. The area to the north of the site is predominantly residential in character and therefore residential development of the site would integrate well into the existing settlement.
- 2.7 With regards to public transport, the site well located close to an existing bus stop along Rownhams Lane to the east of the site which is served by the regular Bluestar 4 bus between Romsey and Southampton City Centre. It also provides a less regular service to Winchester via the Stagecoach 461 route. There are additional bus stops to the north of the site which are served by the same bus routes. There are additional bus stops along the A27/Botley Road approximately 17 minutes' walk from the site and provides further transport links via the Bluestar 5 bus route and provides links to Boyatt Wood, Eastleigh and Romsey. This stop also provides links to Brockenhurst College via the C7 bus.
- 2.8 There are some existing services within North Baddesley including North Baddesley Junior School being located approximately 15 minutes' walk from the site, a Co-op store approximately 15 minutes' walk from the site, a village hall and a range of pubs and restaurants.
- 2.9 While there are existing services within North Baddesley itself, the site is also well connected to the nearby settlement of Romsey which provides more extensive services. Romsey Railway Station also provides regular services to Salisbury, Cardiff, Southampton and Portsmouth. There are also good road links via Rownhams Lane to Rownhams, Nursling and Southampton city centre to the south.

Planning History

- 2.10 Based on Test Valley Borough Council's planning records, there are no relevant planning applications on the site relevant to the proposed residential development.
- 2.11 In terms of the surrounding area, an outline application for up to 300 dwellings was approved to the north-west of the site under reference 16/02432/OUTS; following this several reserved matters applications have been submitted for the various parcels of development under this outline application. While that site was subject to an allocation, the approval of residential development in the area demonstrates that North Baddesley can accommodate residential development subject to site-specific constraints and developer contributions.

3. Response to Consultation

Response to Local Plan Vision

- 3.1 We support the Local Plan Vision's aim to provide access to good quality of homes and we note that settlements such as North Baddesley are capable of accommodating a level of growth which would assist in meeting this aim. As detailed later in these representations, there is a high degree of connectivity between North Baddesley and nearby settlements, meaning that development in this area would be capable of meeting local needs within Southern Test Valley and more widely across South Hampshire. My client's site is well-located to the existing settlement boundary and is therefore in a highly sustainable location.
- 3.2 We also support the Vision's proposed safeguarding of diverse natural, built and cultural resources. As shown in the Masterplan submitted alongside these representations, development of the site could incorporate large areas of open space and SANG which is consistent with this objective. It can also deliver biodiversity net gains which would further meet this aim.
- 3.3 The aim to encourage active lifestyles and enhance health and wellbeing is also supported. Development at Land at Packridge Farm would provide connectivity into the footpaths and would provide cycleways as part of the site proposals.

Spatial Strategy Policy 1 (SS1): Settlement Hierarchy

Settlement Hierarchy

- 3.4 We strongly support the inclusion of North Baddesley as being a Tier 2 settlement and note that this is similar to its current status in the adopted plan. Tier 2 settlements, such as North Baddesley, are capable of accommodating strategic allocations and could therefore accommodate significant levels of growth as part of the emerging plan. We also note that the Council's Settlement Hierarchy Assessment scores North Baddesley highly in terms of access to facilities and services and is one of the higher ranking Tier 2 settlements in the Borough in this regard.
- 3.5 In addition, North Baddesley has a strong geographical relationship to nearby settlements such as Romsey and Southampton which provide access to additional services. Moreover, this connectivity to Southampton and the wider Partnership for South Hampshire (PfSH) sub-region means that well-located settlements, such as North Baddesley, are highly suitable for accommodating any unmet needs identified in neighbouring authorities.

Settlement Boundaries

- 3.6 In terms of the proposed settlement boundaries, the Council's Settlement Boundary Review is the main evidence base document which supports the proposed settlement boundaries. We are concerned that this assessment does not consider potential allocations for development that may come forward based on the Strategic Housing and Economic Land Availability Assessment 2024. As a result, potential additions to the settlement boundary (such as land at Packridge Farm), have not been assessed. We

query whether this is a sound approach and that the Council may have pre-judged what areas may be suitable for inclusion as part of an updated settlement boundary for North Baddesley. Given that the site is considered as a Variable Allocation in the Sustainability Appraisal, the Council should assess this potential revision of the settlement boundary.

- 3.7 While detailed comments are provided below in relation to housing need, my client's site is a highly suitable site for development and could form a potential allocation for development to meet identified needs. To this effect, it is our view that the settlement boundary should be reviewed to incorporate my client's site. An extension of the settlement boundary of North Baddesley to incorporate the site would be a logical extension of the settlement. The site is not heavily constrained, especially compared to other areas on the edge of North Baddesley where additional development may require development in a SINC, ancient woodland, or in areas which would cause greater coalescence with nearby settlements. The Council has also clearly concluded at least part of the site has potential on the basis that it has been tested as an option with the Sustainability Appraisal.

Spatial Strategy Policy 3 (SS3): Housing Requirement

- 3.8 We agree that the starting point for determining housing need is the Standard Method in line with the NPPF. We note that the Standard Method figure has been updated since the publication of the Reg 18 Plan to 524 dpa as of March 2024.

- 3.9 Paragraph 60 of the NPPF states that:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. The overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community".

- 3.10 Paragraph 61 of the NPPF states:

"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 ... There may be exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for." (our underlining)

- 3.11 It is clear that national planning policy reiterates the long-held Government policy of significantly boosting the supply of housing and that in order to calculate the minimum number of homes needed, the Local Housing Need derived from the standard method is an advisory 'starting point'. The NPPF also establishes that the minimum number of

homes needed should be informed by a local housing need assessment and crucially in this case that any needs that cannot be met within neighbouring areas should also be taken into account.

- 3.12 Whilst we welcome the use of the Standard Method for the purposes of establishing housing needs, the Council will need to consider whether there are unmet needs in neighbouring authorities that need addressing. While we acknowledge that the Council have had some engagement with neighbouring authorities to review unmet housing, in particular the request by Havant Borough Council to assist in delivering against their housing needs, we are very concerned with the current limited approach to identifying and assessing a higher housing target based on unmet needs in neighbouring authorities.
- 3.13 The Council's view is that several neighbouring authorities with potential unmet needs are at early stages of plan-making where these needs will be tested and instead seeks to incorporate this into a future review of this plan. We set out below that there is clear evidence of existing and projected unmet needs in neighbouring authorities that should be assessed and incorporated as part of this Local Plan. Deferring this exercise until a future review will simply delay the opportunity of meeting needs now, exacerbating the shortfall in delivery of market and affordable housing within the wider sub-region.

Unmet Need in Neighbouring Authorities

- 3.14 In terms of the wider PfSH region, the PfSH Spatial Position Statement 2023 identifies a potential shortfall of 11,771 dwellings within the PfSH area, despite Test Valley demonstrating a surplus of 743 dwellings (within the PfSH area). The PfSH assessment does not account for any shortfalls in Southampton, which is subject to the 35% urban uplift. Therefore, there is a significant level of unmet need within the PfSH sub-region.
- 3.15 In terms of specific authorities, Southampton City Council's 2022 Regulation 18 consultation identifies a need of approximately 26,500 homes over the plan period of 2022-2040 (1472 dpa) which includes the 35% urban uplift as required by the NPPF. However, Southampton only identify a supply of 16,816 (934 dpa), which is significantly below the standard method figure. The Plan confirms that this is a consequence of constraints around the availability of sites and the limited ability to extend the urban area given Southampton's administrative boundary; this limits the ability for Southampton's level of need to be accommodated within the city. We do note that Paragraph 62 of the NPPF states that the urban uplift should be accommodated within the city, however given the significant constraints identified, the limits of this policy will be stretched. These assumptions on Southampton's ability to deliver against its housing need target will need to be scrutinised as part of their emerging plan's examination, however there is clearly a significant level of unmet need from Southampton City Council (which is not accounted for within the PfSH assessment above) that is unlikely to be delivered within Southampton.
- 3.16 We are also aware that the adopted Eastleigh Borough Local Plan identifies a shortfall of 3,346 dwellings over the plan period (equivalent to 167 dpa). The PfSH Spatial Position Statement also highlights a shortfall within the New Forest of 5,652 dwellings between 2023-36 (434 dpa).

- 3.17 As mentioned in the consultation document, we are aware that Havant Borough Council have requested assistance with unmet needs within their borough. While Havant Borough Council are seeking to deliver against their Standard Method Figure (as per their 2022 Regulation 18 Consultation), the Inspector for the withdrawn Havant Borough Local Plan 2036 highlighted concerns related to the deliverability of several proposed allocations, particularly in Havant Town Centre. There is the opportunity for Test Valley to accommodate these potential unmet needs in settlements in the PFSH region, such as North Baddesley.
- 3.18 Therefore, there is clear evidence of projected unmet needs in several neighbouring authorities, notably Southampton City Council, the boundary of which is located very close to North Baddesley beyond the M27 to the south. The Council's approach appears to be unsound given the significant evidence of unmet needs in neighbouring authorities, particularly given the figures published in the PFSH Position Statement which Test Valley Borough Council has been involved in the preparation of; the Council's approach runs contrary to the collaborative approach that has previously been undertaken through the PFSH. The failure to seek to deliver unmet needs through the Duty to Cooperate means that the plan is not positively prepared and may not be found sound at examination.

Unmet Needs as identified by Housing Land Supply

- 3.19 In addition to the above unmet needs identified through emerging plans and the PFSH Position Statement, there is additional evidence of historical unmet needs as identified through existing Housing Land Supply positions in neighbouring authorities.
- 3.20 While Southampton City Council have not published a recent Housing Land Supply update and no recent appeals have tested a potential figure, we are aware that the NPPF's requirement for a 35% uplift in housing need within Southampton is a challenging target that the Council would struggle to deliver against. In addition, the Council's Draft Strategic Land Availability Assessment 2022 could only identify a supply of 16,905 dwellings compared to a target of 26,478 dwellings for the period 2022-2040. Therefore, it is likely that Southampton City Council cannot identify a 5 Year Housing Land Supply.
- 3.21 New Forest District Council's most recent Statement of Five-Year Housing Land Supply (January 2022) identifies a supply of only 3.1 years. While this assessment is somewhat dated, in appeal reference: APP/B1740/W/23/3324227 (January 2024) New Forest District maintained that there is only a supply of 3.1 years, and this matter was common ground for both the appellant and authority.
- 3.22 Wiltshire Council's April 2022 Housing Land Supply Statement concludes that the Council can only demonstrate a supply of 4.6 years. A recent appeal (ref: APP/Y3940/W/23/3321957 - October 2023) confirmed that Wiltshire Council still claim a 4.6 year supply. The Inspector also commented that the appellant disputed this figure and, while a full assessment was not undertaken as part of that appeal, the Inspector concluded that "the shortage of housing land highlights a significant unmet need, and I was not presented with convincing evidence that this will be remedied soon."

- 3.23 While not closely related to Test Valley Borough Council, we note the request from Havant Borough Council through the Duty to Cooperate in requesting assistance to deliver against unmet needs in that Council. The March 2023 Five Year Housing Land Supply Update concluded that Havant Borough Council can only demonstrate a supply of 1.81 dwellings.
- 3.24 The above demonstrates a clear level of historic and current unmet needs in neighbouring authorities. This provides further evidence that the Council should consider the allocation of additional sites to address these needs as part of this Local Plan. Given the location of North Baddesley within the PfSH sub-region, and the location of the Packridge Farm site close to neighbouring Councils of Southampton and Eastleigh in particular, it is very well placed in this respect.

Five Year Housing Land Supply Protection

- 3.25 Paragraph 76 of the NPPF states that *“Local planning authorities are not required to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing for decision making purposes if the following criteria are met:*
- (a) their adopted plan is less than five years old; and*
 - (b) that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded.”*

- 3.26 While the Council is seeking to plan for a supply of housing slightly above the Standard Method figure, many of the sites proposed are larger, strategic sites which are unlikely to deliver significant levels of housing in the first 5 years of the plan and therefore the above housing land supply protection may not be achieved if the plan is adopted following examination. Therefore, the Council may seek to allocate additional sites, such as Land at Packridge Farm, which are highly deliverable with no immediate constraints and, to a large extent, could be delivered in the first 5 years of the plan.

Ability to Deliver against Unmet Needs

- 3.27 As outlined above, we are concerned with the Council’s view in paragraph 3.62-3.63 in the Reg 18 plan that individual local plans in the area need to progress until any level of unmet need is assessed in those authorities, and consequently, rather than seeking to accommodate any unmet needs within the Reg 18 Plan, the Council would look to review the plan in the future to take account of any unmet needs identified.
- 3.28 However, this approach fails to address for the historic, current and future wider unmet needs across the sub-region as identified above and as part of the PfSH Spatial Position Statement that the Council has helped contribute to. It is our view that if this approach is taken forward then there is a high risk that in the absence of addressing this through the next stage of the Plan it may not be found sound in line with Paragraph 35(a) of the NPPF.
- 3.29 We consider that the Council is in a strong position to deliver additional housing that would meet the significant unmet needs identified. The Council has consistently shown a high level of housing delivery through the Housing Delivery Test, with the 2022 measurement showing a delivery rate of 189% against the Council’s housing target.

This level of delivery has been consistent with the with the 2021 and 2020 measurements identifying delivery rates of 184% and 173% respectively. This is a clear indication that the Council is capable of delivering high levels of housing growth and therefore has the ability to accommodate unmet needs in neighbouring authorities. This history of over-delivery within the Borough should not limit the scope for future development and instead offers the opportunity to facilitate much needed growth in the wider region. There remain opportunities to deliver housing on relatively unconstrained sites where any adverse impacts can be suitably mitigated.

- 3.30 As previously stated, settlements such as North Baddesley in the Southern Test Valley Market Area are well-suited to accommodating the additional needs identified. To this effect we note that that the Settlement Hierarchy Assessment highlights North Baddesley's connections to other settlements and demonstrates that it is one of the highest-ranking Tier 2 settlements with access to key and supplementary services.
- 3.31 While the proposed approach does not seek to accommodate for unmet needs in neighbouring authorities, the Council did consider this in the Sustainability Appraisal. Scenarios 2 and 4 for growth in Southern Test Valley considered the allocation of additional sites to facilitate growth coming from unmet needs and both options identified Land at Packridge Farm as a Variable Allocation for 150 dwellings. While detailed comments on this are provided below, this clearly indicates that the Council are aware that opportunities to meet additional housing needs should be considered, and that my client's site is highly suitable deliverable and well located – either to deliver against the Standard Method figure or to accommodate unmet needs in neighbouring authorities.
- 3.32 Therefore, the Council's approach to meeting housing need should be amended to plan for a suitable level of unmet needs in the area, and our client's site represents a significant opportunity to contribute to these unmet needs.

Summary of Unmet Needs

- 3.33 Based on the above, there is clear evidence of unmet needs in neighbouring authorities as shown through the PfSH Position Statement, evidence in the preparation of emerging local plans and through established Housing Land Supply positions.
- 3.34 We do note that the consultation states that the Council is committed to a review of the plan to accommodate unmet needs in neighbouring authorities if more evidence emerges in the future. However, we note there are clear unmet needs based on existing evidence and pushing this issue back to a future review will simply exacerbate market and affordable housing needs in the sub-region. In addition, there is no guarantee that a comprehensive future Plan review would take place in a timely manner. The mandated 5 year review required by the NPPF could be brought forward as a simple review mechanism. This would not be an appropriate approach to determine if additional allocations are required given it is a lighter-touch assessment of evidence and does not require Examination. Therefore, we are not confident that a review would be the correct approach and would likely embed existing supply issues in neighbouring authorities.
- 3.35 Therefore, the Council's approach is not positively prepared and may be found unsound at examination. It is our view that the Council should consider allocating

additional sites, particularly within the PfSH sub-region and in close proximity to neighbouring Council's such as Land at Packridge Farm, for residential development.

Policy SS6: Meeting the Housing Requirement

- 3.36 Aside from the above comments in respect of housing need, we have the following comments to make on the proposed strategy to meet identified needs. As commented above, the Council are seeking to deliver slightly above the Standard Method figure according to the Reg 18 Plan. However, there is clear evidence for unmet needs and therefore an alternative strategy would need to be taken forward to deliver against an updated housing requirement.
- 3.37 The Sustainability Appraisal considers 4 options for accommodating growth in Southern Test Valley: Scenarios 1 and 3 do not consider the potential to deliver against unmet needs in neighbouring authorities (and instead consider alternative approaches to deliver against the Standard Method figure); Scenarios 2 and 4 do consider delivering a higher level of growth to accommodate for potential unmet needs from neighbouring authorities. As previously mentioned, Scenarios 2 and 4 identify my client's site as a '*Variable Allocation*' for 150 dwellings. Given the clear evidence of unmet needs in neighbouring authorities, the Council should consider the allocation of additional sites and Scenario 2 or 4 offer the potential to accommodate this growth in sustainable settlements, such as North Baddesley.
- 3.38 We do note that the site area shown in Scenarios 2 and 4 appears to include land outside of my client's control. This land appears to be SHELAA 255 which was not promoted by my client. This appears to be in error as the site assessment in Appendix IV of the Sustainability Appraisal indicates a capacity for my client's site as being 150 dwellings, with an indicative capacity of the SHELAA 255 site being 50 dwellings. The assessment of the SHELAA 255 site also concludes that it "offers limited potential for residential development". We request that the Council clarify this approach and amend the areas shown in Scenarios 2 and 4 accordingly.
- 3.39 While we strongly support the principle of the Variable Allocation, the Officer Assessed Housing Capacity of 150 dwelling in Appendix 4 of the Sustainability Appraisal is significantly lower than the level previously promoted by my client through the SHELAA. Notwithstanding the updated Masterplan restricts development to the north of the pylons on site and demonstrates that around 170 dwellings could be accommodated on site (assuming a density of 35 dph over a net developable area of 4.9 ha) which is slightly above the officer assessed capacity. This approach would provide additional land for landscape improvements, SANG and potential formal and informal open space.
- 3.40 In terms of assessing landscape impacts, it is recognised that the land to the north of the pylons crossing east to west, is well contained by a corresponding ridgeline and is better related to the existing built settlement edge. The Site Appraisal in Appendix IV of the Sustainability Appraisal commented that development of the site could lead to coalescence with Rownhams and was therefore marked down in terms of suitability in this respect. However, the proposed reduced developable area would only result in a modest extension to the built-up-area of North Baddesley compared to the previous

proposals. In addition, by reducing the extent of the development area this offers the potential to deliver on-site SANG, and formal and informal open space. This would secure a defensible boundary in perpetuity and protect against further development which could cause coalescence between North Baddesley and Rownhams.

Policy CL3: Sustainable Buildings and Energy Use

- 3.41 Although we do not have any specific comments to make on this policy, we are concerned that these standards are significantly beyond existing building regulations and the Future Homes Standards that are due to come into force in 2025. While there is an allowance for viability within this policy, we question the practicality of these standards in terms of delivering the amount of market and affordable housing to address the Council's needs. In particular, the requirement for developments to demonstrate net-zero operational carbon on site and the requirement that energy consumption is balanced by energy generation by renewables. This may restrict the net developable area of sites to incorporate additional infrastructure to meet this renewable energy requirement, and therefore have a negative impact on the deliverability of housing in the Borough.

- 3.42 In order for the Local Plan to be found sound when it comes to Examination it is essential that any requirements that go beyond current or planned building regulations are well-reasoned and include a robustly costed rationale that ensures development remains viable and that the impact on housing supply and affordability is considered in accordance with the NPPF. This position is highlighted within Housing Minister Lee Rowley's Written Ministerial Statement (WMS) that accompanied the current consultation on the Future Homes and Buildings standards to be delivered by way of changes to Building Regulations (12 December 2023). The WMS states:

"... the introduction of the 2021 Part L uplift to the Building Regulations set national minimum energy efficiency standards that are higher than those referenced in the 2015 WMS rendering it effectively moot. A further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continues to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes.

The improvement in standards already in force, alongside the ones which are due in 2025, demonstrates the Government's commitment to ensuring new properties have a much lower impact on the environment in the future. In this context, the Government does not expect plan-makers to set local energy efficiency standards that go beyond current or planned buildings regulations. The proliferation of multiple, local standards by local authority area can add further costs to building new homes by adding complexity and undermining economies of scale."

- 3.43 In addition, the proposed policy will increase demand on the electricity network and could result in capacity issues in the local network to accommodate new development connections. The Council should check with electricity providers that there is sufficient electricity capacity in the local network to support additional housing growth.

Policy CL4: Water Use and Management

- 3.44 Our client notes the requirement that new dwellings will be required to demonstrate that it will meet a water efficiency standard of 110 litres per person per day (lpppd). However, we are concerned that this goes beyond the mandatory 125 lpppd set out in existing building regulations. Therefore, this requirement needs to be properly evidenced.
- 3.45 We are concerned with the suggestion of using conditions to restrict occupation of developments prior to the delivery of off-site upgrades for water / wastewater infrastructure. We consider that this could see delays in the delivery of sites. There could be a lack of certainty in the timescales for implementing these upgrades and could lead to situations where multiple sites need to come forward to secure funding for wider upgrades. In addition, the upgrading of water / wastewater infrastructure is often undertaken in 5-year cycles indicating that there could be significant delays to the delivery of housing if this approach is taken forward.
- 3.46 Ultimately, it is not up to developers to provide water / wastewater infrastructure. An infrastructure charge is paid by developers to the relevant providers on a per plot basis, and there is an obligation on the providers to deliver the necessary infrastructure to serve new development in a timely manner. As such, it would be unreasonable to stall development through use of planning conditions as suggested through the draft policy.
- 3.47 We suggest a different approach similar to the Levelling Up and Regeneration Act 2023 statutory duty on water companies to upgrade wastewater treatment works and for LPAs to take account of these future upgrades in their decision-making. This approach, in which decision-makers have regard to planned upgrades, would provide more certainty on the deliverability of sites and avoid unnecessary delays.

Policy BIO1: Conservation and Enhancement of Biodiversity and Geological Interest

- 3.48 This policy introduces a sequential test for sites that have an effect on species of habitats. This approach is not consistent with the NPPF which does not set out a sequential approach to protecting habitats, with Paragraph 85 instead setting out which habitat designations / types that plans should conserve. The sequential test element of the Policy should be deleted.

Policy BIO2: International Nature Conservation Designations

- 3.49 While we have no specific comments in respect of this policy, the site has the potential to provide for nutrient neutrality and recreational impact mitigation on site through the offsetting of existing agricultural land and the provision of SANG on site.

Policy BIO3: Biodiversity Net Gain

- 3.50 Our client notes the proposed 10% requirement for biodiversity net gain and have no specific objection to make as this reflects the requirement in the Environment Act.

However, given that the Environment Act's statutory requirement for 10% biodiversity net gain is in effect as of February 2024, we query whether this policy is necessary. The National Planning Policy Framework, Dec 2023 (NPPF) is clear in paragraph 16 f) that plans should avoid unnecessary duplication of policies (including policies within the NPPF).

- 3.51 In addition, the policy does not reflect the Environment Act's exemption provisions and is therefore more restrictive than the statutory requirement to demonstrate net gains in biodiversity. This policy should be either removed due to duplication (as above) or amended to reflect the Environment Act's provisions.

Policy HE1: Open Space and Recreation

- 3.52 As currently worded, it is not clear if the provision of SANG on development sites would contribute towards the Public Open Space provision; the only reference is in paragraph 5.282 of the supporting text which states that open space "may be located adjacent to Suitable Alternative Natural Greenspace". Since SANG provision can form a dual purpose in mitigating habitats impacts of new residential development and provide open space for future residents of a development, it is considered that completely separating the two is too restrictive in approach.
- 3.53 In addition, the policy is too restrictive in not permitting pedestrian or cycle paths to be included in the calculation of Public Open Space. These aspects of Public Open Space still allow future residents to appreciate the Public Open Space provided and it is not clear what justification the Council have to restrict this. We also request that the Council clarify the exclusion of ancillary buildings in this context.

Policy DES1: Delivery of Sustainable and High-Quality Design

- 3.54 We have no specific objection to this policy. However, we note criteria h) expects applicants to produce a masterplan, design code or design and access statement depending on the nature and scale of development. While we do not have any objection to this requirement, we think it is important for the Council to set out further detail on the thresholds for development. Paragraph 5.318 does provide some clarity in stating that developments of over 100 homes a masterplan or design code will be expected, although more information on the level of detail the Council expects within a design code with clear parameters would assist applicants in producing better design codes and ensure consistency.

Policy HOU1: Affordable Housing

- 3.55 We have no specific comment on this policy other than to highlight that an allocation of the site would assist in meeting the acute need for affordable housing in the Borough. We support that this policy includes a mechanism to review the provision of affordable housing accounting for viability.

Policy HOU2: Community Led Development

- 3.56 This policy is an updated version of Policy COM9 from the adopted local plan, a key change being that it requires residential development coming forward under this policy

to predominantly be for affordable housing. The effects of this revised policy would be more restrictive than the adopted COM9, with paragraph 5.114 of the adopted plan highlighting that both market and affordable housing are appropriate under adopted policy. Effectively there would be a minimal difference between this policy and exception sites under Policy HOU2. We suggest that criteria e) is removed from this policy to Policy HOU3.

Policy HOU5: Provision of Housing to Meet our Needs

- 3.57 We support the proposed approach to seek a mix of homes based on local evidence, rather than setting arbitrary targets which may not reflect local needs in the future. However, we think that criteria a) should be updated to include a consideration of market demand, which could form part of local evidence.

Policy HOU6: Residential Space Standards

- 3.58 We support the use of Nationally Described Space Standards or equivalent in setting space standards for residential development. However, we are concerned with developments being required to meet M4(3)A adaptable homes standard. It is not clear what evidence there is to support this requirement and note that some developments may have difficulties in delivering this requirement due to site constraints. Instead, the policy should incorporate flexibility on this requirement or state that this will be negotiated on a site-by-site basis.

Policy HOU7: Self-Build and Custom Build Housing

- 3.59 We support the proposed approach in terms of self-build and custom build housebuilding and welcome the proposed flexibility in this policy.

4. Packridge Farm – Development Opportunity

4.1 Based on the above, my client considers that the site at Packridge Farm represents a suitable opportunity for an allocation in the emerging Plan. Attached at Appendix 1 and 2 of these representations is an Illustrative Masterplan and Site Deliverability Statement. These provide additional detail on the opportunity and demonstrates how a layout and land use disposition can be progressed that minimise any adverse impacts.

4.2 The key attributes of a potential site allocation are identified below:

- delivery of around 170 dwellings with 40% affordable housing provision to meet housing needs in Test Valley and neighbouring authorities;
- containing the extent of residential development to the north of the site to minimise wider landscape impacts and impacts on heritage assets;
- providing a suitable access on to Hoe Lane that secures appropriate visibility splays but also retains more significant trees and vegetation;
- delivering a high quality sustainable neighbourhood with good connectivity to local facilities and services on foot, and wider facilities and services via cycling and public transport;
- providing the opportunity for enhancements to existing footways, cycleways and bus stops to improve the opportunity for alternative modes of transport to the car;
- delivering on-site SANG to mitigate recreational impacts on the New Forest SPA;
- securing extensive informal and formal open space for the benefit of future and existing residents;
- as a consequence of the SANG and open space, in so far as there is any risk, safeguarding the long term separation of North Baddesley from Rownhams to the south;
- delivering extensive bio-diversity net gain through extensive planting on site and converting agricultural land to ecologically more rich environments; and
- providing nutrient neutrality through the loss of agricultural land.

5. Summary

- 5.1 These representations have been prepared by Turley on behalf of our client Persimmon Homes (South Coast) Limited in support of its proposals for development of Land at Packridge Farm, North Baddesley. Our client's Site is suitable for residential development and should be considered as an allocation in the emerging Local Plan.
- 5.2 While we support the overall Vision for the plan, we have concerns about the Council's approach to delivering housing need, both in terms of the quantum of housing proposed as well as the overall strategy to deliver housing. The Council should work with neighbouring authorities to accommodate the identified levels of unmet need in the South Hampshire region. The Council's Sustainability Appraisal determines that a scenario which does not accommodate for unmet needs in neighbouring authorities is most appropriate; given the clear level of unmet needs in the region, this approach means that the plan is not positively prepared and in its current form runs a high risk of being found unsound at Examination.
- 5.3 However, the Sustainability Appraisal considers 2 options which would account for unmet needs in neighbouring authorities and proposes the site as a potential allocation in both of these scenarios. We agree that the site is suitable for residential development, for around 170 dwellings and offers the potential for securing significant benefits through on-site SANG, extensive open space and mitigating for nutrient neutrality. It is essential that Scenarios 2 and 4 should be explored further. For all the reasons highlighted above, it is my client's view that this exercise will reveal that the site should be identified as an allocation.
- 5.4 We strongly support North Baddesley being identified as a Tier 2 settlement, and we highlight that it is one of the most sustainable Tier 2 settlements as identified by the Settlement Hierarchy Assessment. North Baddesley is capable of accommodating strategic allocations and can play a crucial role in meeting any identified needs. Despite this, we are concerned that no major allocations for residential development are proposed at North Baddesley, and this runs against the high level of sustainability indicated by the Council's evidence base.
- 5.5 We trust that the information provided within these representations will be considered by the Council. We would welcome the opportunity to meet with officers to discuss the Site further and would be grateful if you could confirm a suitable time and place to meet at your convenience.
- 5.6 In the meantime, please do not hesitate to contact us to discuss the Site or this submission further.

Appendix 1: Concept Masterplan

Appendix 2: Site Deliverability Statement

Turley Office

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



- Site boundary
- Primary Access Point
- Developed Area
- Residential Blocks
- Primary Street
- Equipped Play Area
- Formal Playing Pitch
- SANG Area
- SuDS Basin
- Existing Open Space
- Existing Vegetation
- New Tree Planting
- Strategic Landscaping/ Informal Open Space
- Provision for Children and Teenagers
- SANG Walking Loop (2.3km)
- Existing Water Main
- Overhead Power Lines
- Local Woodland
- 5m Contours
- Existing Buildings

Land Use	Area (ha)
Site Area	17.55
Net Developable Area	4.90
Informal Open Space	1.93
Provision for Children and Teens	0.27
SANG	10.43

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CLIENT Persimmon

PROJECT North Baddesley

DRAWING: Concept Masterplan

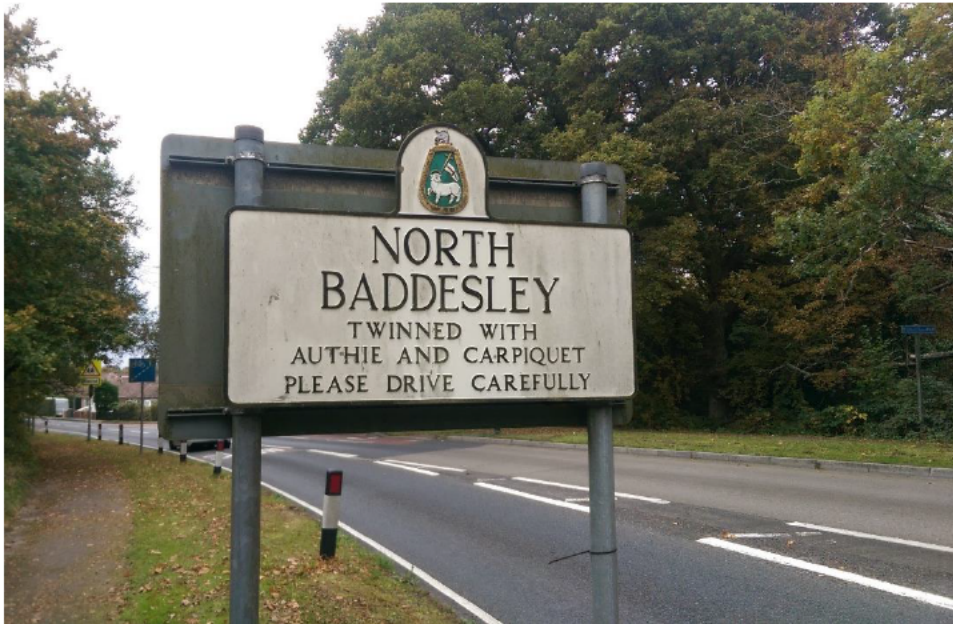
PROJECT NO. PERS3019	STATUS Draft
DRAWING NO. 3000	SCALE 1:2500 @ A3
REVISION B	DATE April 2024
	CHECKED BY DH/CD



Packridge Farm

North Baddesley

Site Deliverability Statement



April 2024



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1.0 INTRODUCTION

This delivery statement demonstrates that the area at Packridge Farm, North Baddesley is capable of providing circa 170 new homes and offers the potential to provide land for new community provision and substantial new open space. The site represents a sustainable and deliverable development opportunity that can make a meaningful contribution towards meeting the future housing needs of Test Valley and the wider sub-region.

The site is identified as a Variable Allocation under Scenarios 2 and 4 in the Council's Sustainability Appraisal and represents the opportunity to deliver housing to deliver against local needs within Test Valley and to address unmet needs in neighbouring authorities.

Since our previous statement, we have progressed the development proposals for the site and produced a new masterplan which would restrict residential development to the northern part of the site and enable landscape improvements, the provision of Public Open Space and SANG on the remainder of the site.

This statement has been prepared with the aid of a number of technical assessments and drawings listed below. These documents can be provide upon request.

- Access Appraisal
- Preliminary Heritage Appraisal
- Landscape Appraisal
- Preliminary Ecological Appraisal
- Biodiversity Net Gain Assessment
- Utilities Report and Map



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1.1 PURPOSE



Figure 1: Google image of the site

The purpose of this Statement is to show that the Packridge Farm, North Baddesley site is a sustainable and logical housing allocation opportunity that can be brought forward in the short term (i.e. within the next 5 years).

Persimmon Homes is one of the largest house builders in the country and has a proven record of housing delivery in a timely manner to meet the needs of planning policy. The company has previously worked with the Council to deliver housing, most recently at Andover. Persimmon has contracted with the landowner to promote the Packridge Farm, North Baddesley site on their behalf.

The site has been subject to a number of technical assessments which have shown that there are no insurmountable physical or policy constraints to the delivery of the site for housing. This work, together with analysis of the site's opportunities and influences, has informed the production of an updated Illustrative Masterplan for the site, which is detailed later in the statement.

1.2 SITE CONTEXT

The site is located to the south of North Baddesley, in the southern area of the Test Valley Borough.

The site comprises 17.80 hectares (43.98 acres) of undeveloped grazing land. The site sits to the south of Hoe Lane, and west of Rownhams Lane, which links southward to Rownhams and Southampton beyond. The site adjoins the settlement boundary which runs along Hoe Lane.

North Baddesley is proposed to be a Tier 2 settlement within the Settlement Hierarchy to the southeast of Romsey. It has all the local amenities new residents would require such as: schools, shops and community facilities as well as being close to Romsey, Southampton, Eastleigh and employment and retail opportunities. The emerging plan states that Tier 2 settlements are capable of accommodating strategic allocations.

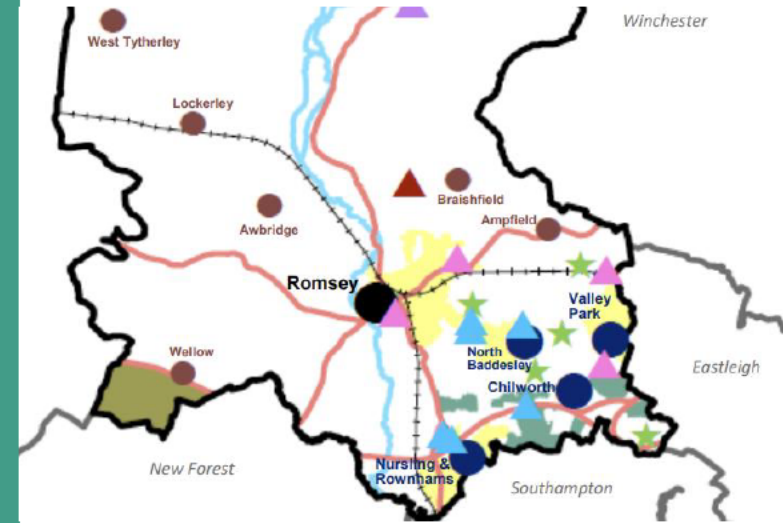


Figure 2: Emerging Local Plan Key Diagram Extract



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1.2 SITE CONTEXT

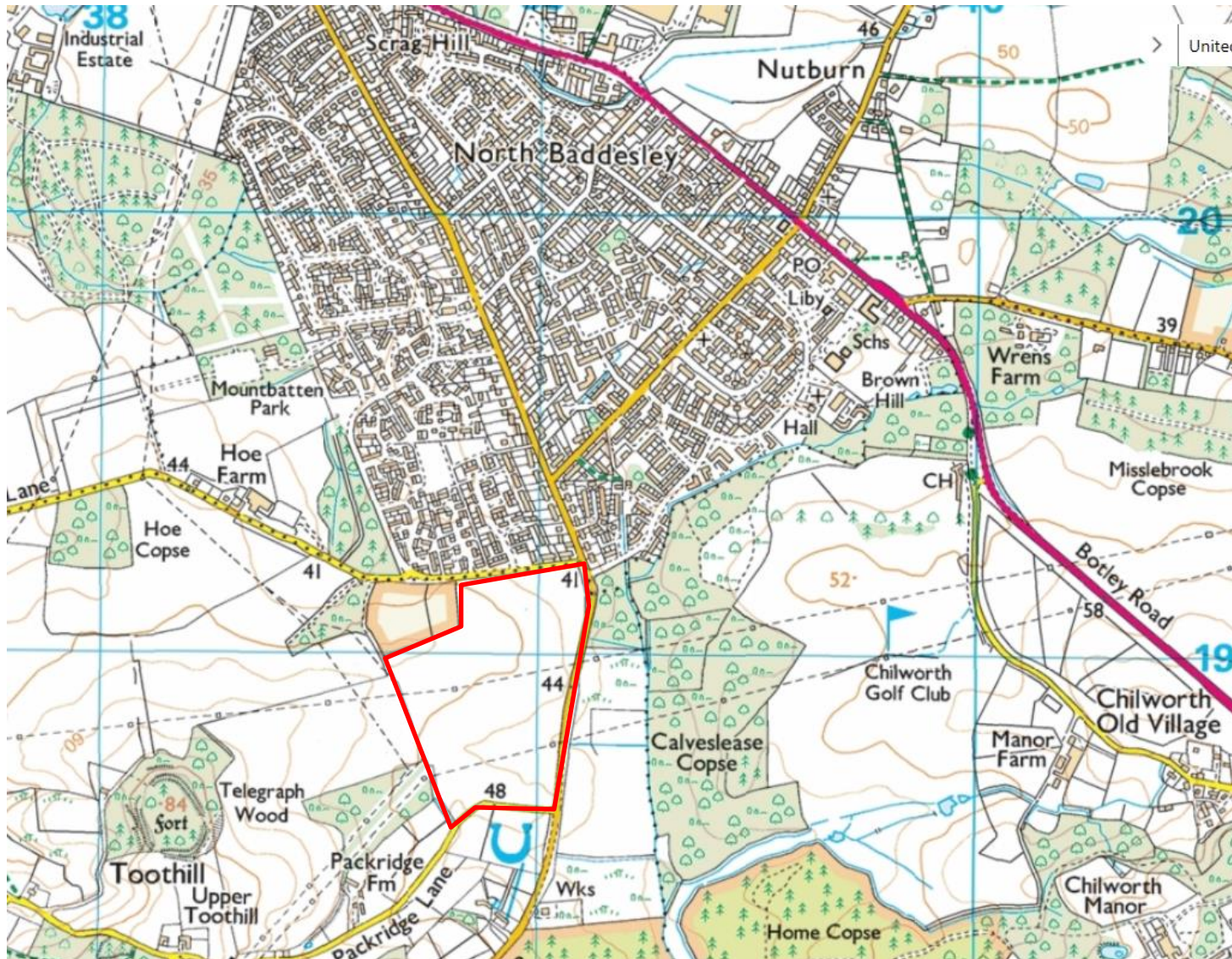


Figure 3: Location Plan

2.1 NATIONAL POLICY

The National Planning Policy Framework (NPPF) is a key consideration in the determination of planning applications and formulation of Development Plans.

The NPPF forms an integral part of the Government's objective to make the planning system less complex and more accessible. It promotes the protection of the environment and provides a more streamlined mechanism that delivers its pro-growth strategy and ambition to significantly increase house building.

As set out in the NPPF, sustainable development is central to both decision taking and plan making. In order to achieve sustainable development, three objectives should be pursued: economic, social and environmental. Planning Practice Guidance (PPG) provides additional detail to the policies of the NPPF, alongside extensive guidance in relation to local plans.

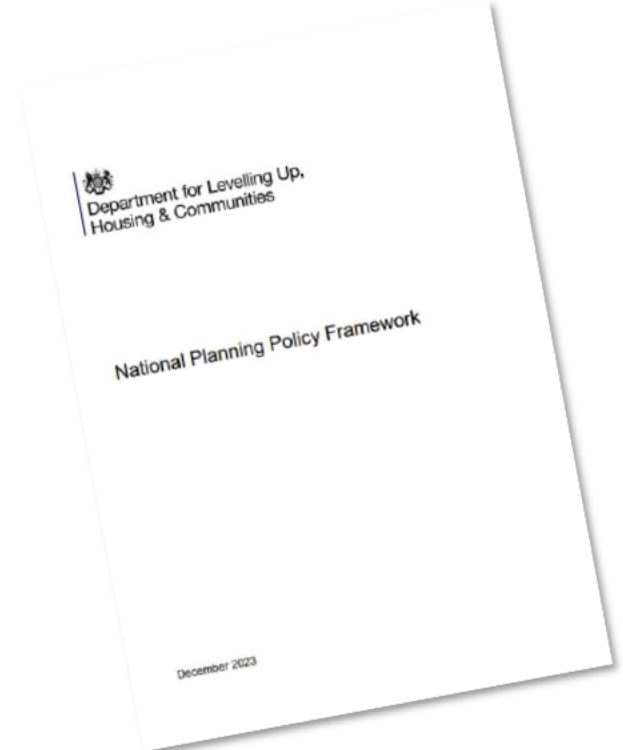


Figure 4: Cover of National Planning Policy Framework, 2023



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2.2 REGIONAL POLICY

Local Authority	Annual Housing Need using Standard Method (dpa)	Total housing need 2023 – 2036	Identified Supply = Commitments, local plan allocations + windfall estimate	Shortfall/ surplus
East Hants (part)	113	1,469	1,275	-194
Eastleigh	667	8,671	6,160	-2,511
Fareham	541	7,033	9,356	+900 ¹⁰
Gosport	353	4,589	2,518	-2,071
Havant	516	6,708	4,105	-2,603
New Forest	1,056	13,278	8,076	-5,652
Portsmouth	899	11,687	11,304	-383
Southampton	1,475	19,175	15,951	0 ¹¹
Test Valley (part)	182	2,366	3,109	+743
Winchester (part)	235	3,055	3,055 ¹²	0
Total	6,037	78,481	64,909	-11,771 ¹³

Figure 5: Table 1 extract from PfSH Spatial Position Statement 2023



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Partnership for South Hampshire (PfSH)

The 2011-2029 Local Plan was found adopted in January 2016. The Plan split the development requirements of the Borough between the Northern areas around Andover, and the southern areas, which includes North Baddesley.

Southern Test Valley is very much a part of the Southampton Housing Market Area. This interconnection with the sub-region is emphasised by the areas involvement as part of the Partnership for Urban South Hampshire (PfSH). Therefore, it is important that Test Valley, and that part of the Borough within the PfSH region in particular, consider housing requirements across this HMA.

The PfSH Spatial Position Statement (December 2023) (SoCG) assessed housing need using the standard method relevant at the time, as required by government policy, for Test Valley and the local authorities within the PfSH area (see table opposite). Based on the SoCG, across the PfSH area, housing supply is over 11,000 units short of assessed need. North Baddesley is well placed to address these unmet housing needs.

2.3 NEW LOCAL PLAN

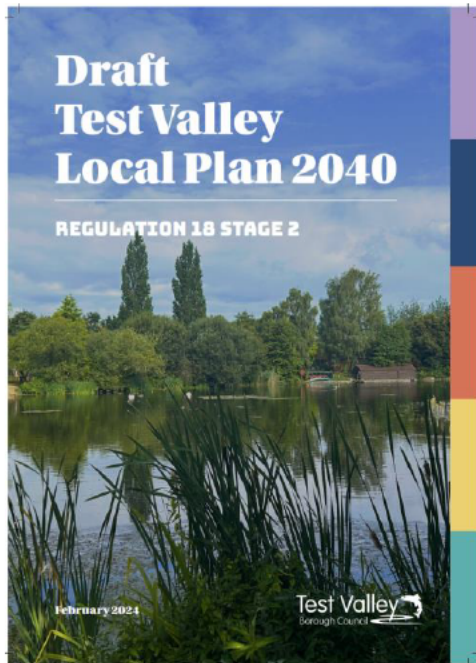


Figure 8: Cover of Test Valley Draft Local Plan 2040 Regulation 18 Stage 2

The Local Planning Authority consulted on a Refined Issues and Options (Regulation 18) draft Plan in 2020. In February 2024 the Local Planning Authority published an updated Regulation 18 Part 2 Plan for consultation.

The new Plan will extend the plan period by at least 7 years (i.e. to 2040). New housing sites will need to be allocated to meet housing need across this period.

The important role of Tier 2 settlements such as North Baddesley, as being considered an appropriate focus for housing growth in the Borough is recognised in the emerging Local Plan.

The Council is aiming to consult on a Regulation 19 Plan in early 2025, which will finalising the strategy for meeting the Borough's housing requirements.

This represents an opportunity to address the shortcomings of the Plan in meeting wider housing needs by identifying sites such as that at Packridge Farm for allocation



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2.4 MARKET ASSESSMENT

In accordance with national policy and guidance, LPAs should use the Local Housing Need (LHN), as determined by the Standardised Methodology, as the starting point for developing housing requirement policies. LHN for Test Valley Borough is currently 524 dpa as of March 2024.

The Council has prepared a Housing Market Assessment (HMA) which will form a key part of the evidence to support the new Test Valley Local Plan.

The technical paper has identified a number of different housing sub-markets which demonstrate that this site is in the Southern Sub-Area. The Romsey and South East sub-area is largely coterminous with the Southampton HMA.

The Council are seeking to deliver slightly above the Standard Method figure to ensure deliverability, however at present the Council is not seeking to deliver additional housing to meet unmet needs in neighbouring authorities. The Sustainability Appraisal considers 4 growth scenarios for Southern Test Valley, with Scenarios 1 and 3 seeking to deliver against the Standard Method figure, while Scenarios 2 and 4 consider how any unmet needs could be accommodated if this approach is taken.



Figure 9: Cover of TVBC Housing Market Areas Study



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3.0 SITE

Figure 10: Google Map of North Baddesley



The site is located to the south of North Baddesley, adjoining the settlement boundary of North Baddesley to its northern edge. North Baddesley has a population of around 12,000 people and has a good sense of community. North Baddesley should be considered a strong contender to accommodate new growth. It is centrally located within Southern Test Valley and within the wider sub-region, has a good range of existing facilities and strong connections to major employment areas.

Within the village itself there are Primary education facilities, employment opportunities, multiple convenience stores, pubs, restaurants and take-aways, a library, community and medical facilities. Secondary education facilities are close by in Romsey (Mountbatten School).

The village has excellent connections to the city of Southampton, as well as the employment areas at Chandlers Ford, Eastleigh, Romsey, Adanac Park and Winchester. The M27 and M3 corridors are also within easy reach, as is Southampton Airport.

3.0 SITE

The first important consideration is the separation of settlements in Southern Test Valley. This forms an important part of the emerging plan, and has led to the designation of a number of “local gaps” (Policy ENV4). The land at Packridge Farm is not part of any local gap, and so development could occur here without causing any sense of physical or visual coalescence. The provision of open space and SANG would mean that development is restricted on that part of the site in perpetuity and assist in avoiding coalescence between North Baddesley and Rownhams in the future. Also this site is not covered by any ecological designations, and so is free from this constraint.

Taking into account the importance of protecting settlement identity, and the importance of protecting ecological sensitive areas, the only logical future directions of growth around North Baddesley are south west and south. This has already been acknowledged (in part) by the allocation of the Hoe Lane allocation which will expand the settlement to the south west.

Following the development of the Hoe Lane allocation, there are no alternative greenfield areas around the settlement free from either Local Gap or SINC designation other than Packridge Farm.

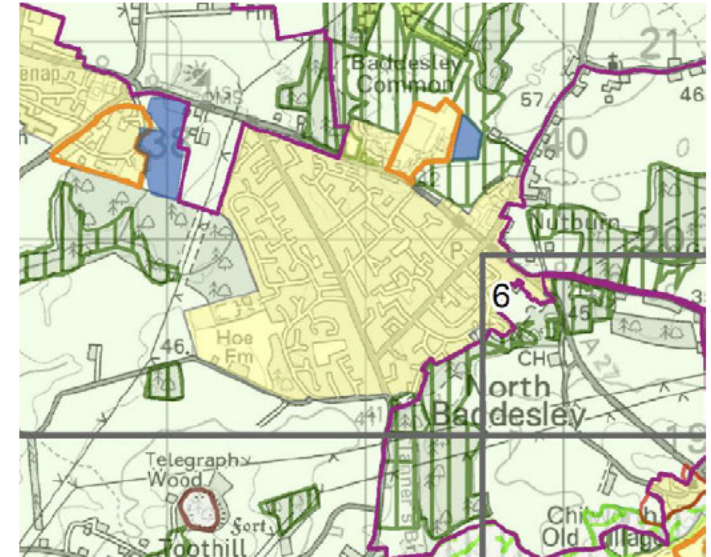


Figure 11: Extract from Emerging Local Plan



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3.0 SITE

Figures 12 and 13: Images around and on-site



The site sits at the southern edge of the urban area of North Baddesley. It is enclosed on three sides by roads, with Hoe Lane to the north, Rownhams Lane to the east and Packridge Lane to the south.

The site has very few natural features, and is mostly unmanaged land, partly used for grazing. The boundaries to the north, east and (along Hoe Lane, Rownhams Lane and Packridge Lane) are a mixture of trees and hedges. The western boundary is less well defined with low level shrubs along part of the boundary and Packridge Wood to the south.

There are two sets of overhead power cables that run east-west through the central part of the site. The power cables effectively split the site into three parcels.

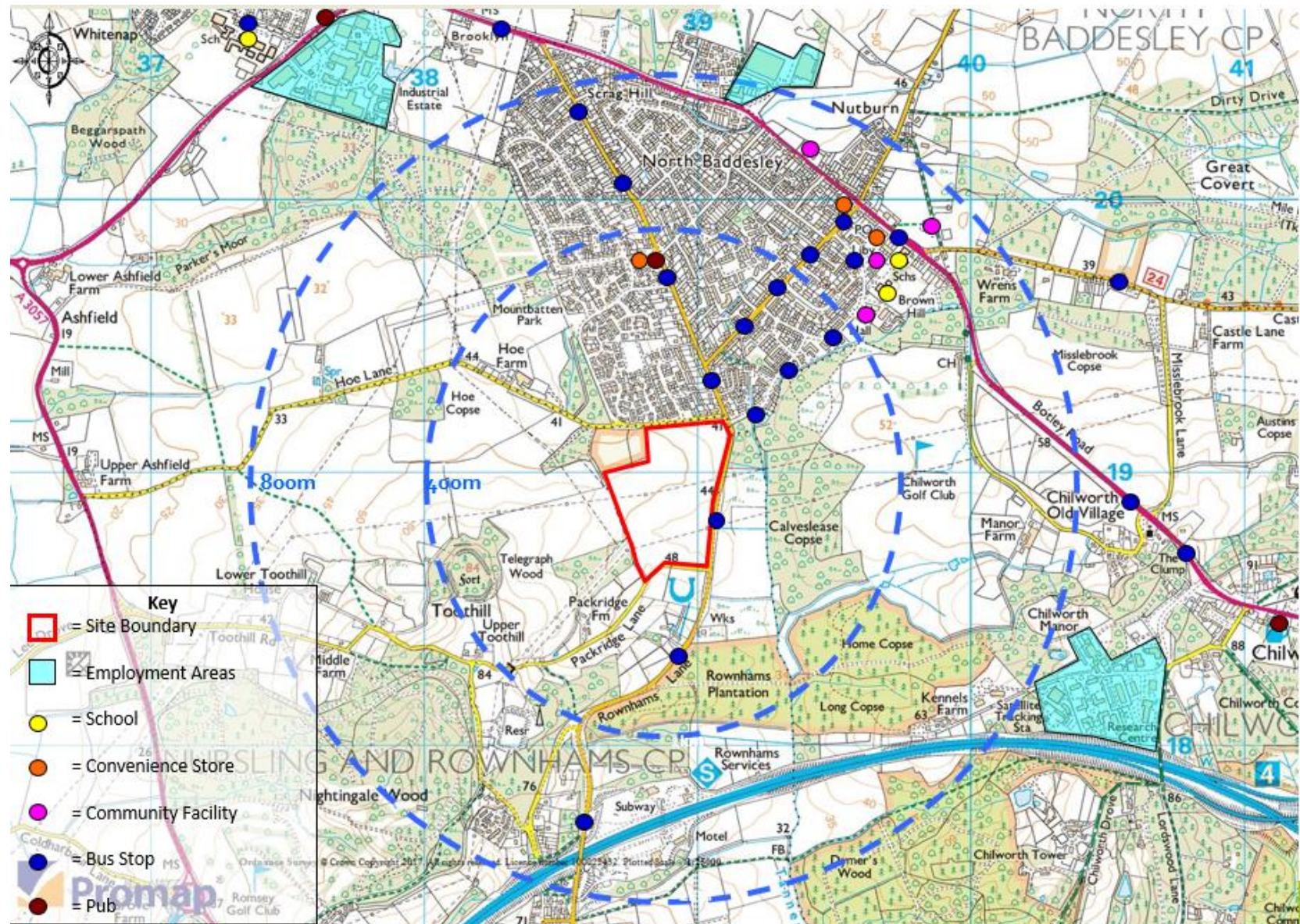
There are no public footpaths or public rights of way through, or adjacent to the site.



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3.0 SITE

Figure 14: Key Facilities Map



3.1 ACCESS

The most suitable access is considered to be along Hoe Lane to integrate with the existing residential areas in North Baddesley. The Council's Site Appraisal commented on whether vehicular access could be gained from Hoe Lane given the tree cover. There are a number of sizeable gaps between these trees which can be used for access and the access point shown in the drawings to the right, covers an area where there are no significant trees along Hoe Lane. In addition, these trees are not protected under a Tree Protection Order.

An initial Highway Access Feasibility Appraisal has been undertaken by ENZYGO, on behalf of Persimmon Homes. This concluded that a suitably designed junction could accommodate residential development. It is considered that the proposed access would be capable of accommodating the reduced number of units in accordance with the updated masterplan. In addition to the vehicular links into the site, multiple pedestrian access points can also be provided onto Hoe Lane to ensure permeability through the site, and into the surrounding settlement.

The site is well connected to cycle routes through the village. There is an off-route existing shared cycle/footpath path to the east of the site along Rownhams Lane, this runs south all the way to Rownhams, on the edge of Southampton. This route turns into an on-route, but segregated, cycle path north of the Hoe Lane Junction before heading further North towards Romsey. These combine to ensure that cyclists can easily connect to the wider sub-region.

In general, North Baddesley is well connected to the surrounding region and this is reflected in its status as a Tier 2 Settlement within the Settlement Hierarchy. There are several bus stops near to the site, with multiple stops on Rownhams Lane and another on Bracken Road. The Bluestar route 4 serves North Baddesley, with 2 services per hour, linking the settlement to both Romsey and Southampton. This route also runs from the site to the nearby schools at Fleming Avenue, and the Mountbatten Secondary School in Romsey.

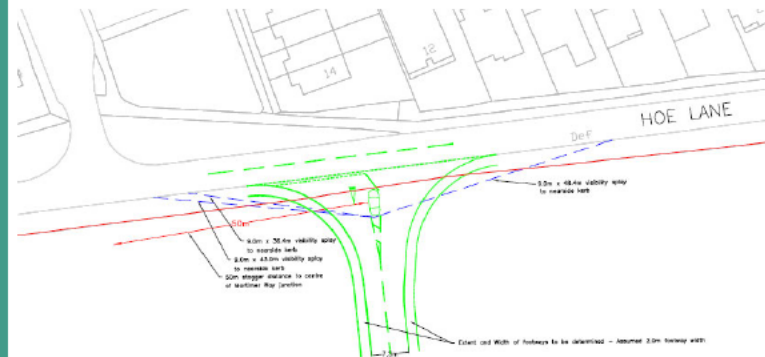
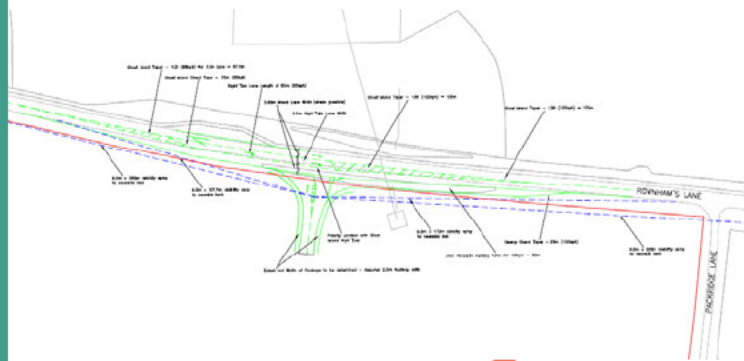


Figure 15 and 16: Proposed access



3.2 LANDSCAPE

Figure 18: Image of Boundary Treatment



A Landscape Appraisal has been undertaken to ascertain the current landscape quality of the site, its visual sensitivity and impacts of the potential development. The majority of the Site has been partitioned into a series of paddocks. There are two high voltage overhead power lines which cross the Site east-west. The Site and its immediate context are not covered by any statutory or non-statutory designations for landscape character or quality.

The visual appraisal identified that views of the Site are limited to the near distance due to existing physical features and ensures much of the site is well contained, meaning its development would have little impact on the wider surroundings. The assessment identified a number of landscape opportunities and constraints to development at the Site which include:

- the retention and reinforcement of the existing boundary vegetation
- sensitive design of a potential access off Hoe Lane to minimise impacts on the existing trees
- a new landscape buffer along the southern development edge to soften the impact between the development and the more rural areas further south.
- Potential for Interconnected green corridors through and around the edges of the site
- Potential for allotments

The Council's Site Appraisal described the site as being a significant urban extension. However, since this assessment we have reduced the area for residential development, and it would form a more modest extension to North Baddesley. In addition, the Settlement Hierarchy in the emerging plan identifies North Baddesley as being suitable for strategic allocations and therefore, in principle, an extension of this size would be acceptable.

The reduced developable area in the updated masterplan enables the opportunity to deliver a large area of publicly accessible open space on the site, to the benefit of both new and existing residents. It would also secure a significant gap between North Baddesley and Rownhams in perpetuity through the provision of SANG.



3.3 HERITAGE

A review of the DEFRA online records has been undertaken to fully understand the status and importance of neighbouring and nearby There are no conservation areas or listed building in the immediate vicinity of the Site (refer to plan on following page). The closest listed buildings are approx. 750m to the south east of the Site and separated by a combination of landform and vegetation.

The Chilworth Old Village Conservation Area is the nearest conservation area, lying approximately 1.5km east of the Site and again there is no inter-visibility as confirmed by the Council's Landscape Sensitivity Assessment.

The Toot Hill Camp Scheduled Ancient Monument is, located on the higher ground to the west of the site. However, this is not publicly accessible and is well contained within an area of woodland. Views from this location will likely be heavily filtered and therefore development at Packridge Farm would have a limited impact on views and setting of the Monument. In order to provide further justification, a Heritage Assessment will be undertaken to support a full application.

The archaeological merits of the site have not yet been assessed. A full archaeological evaluation will be carried out in order to assess the archaeological potential of the site, initially consisting of a Desk Top Assessment, followed by a geophysical survey if considered appropriate.

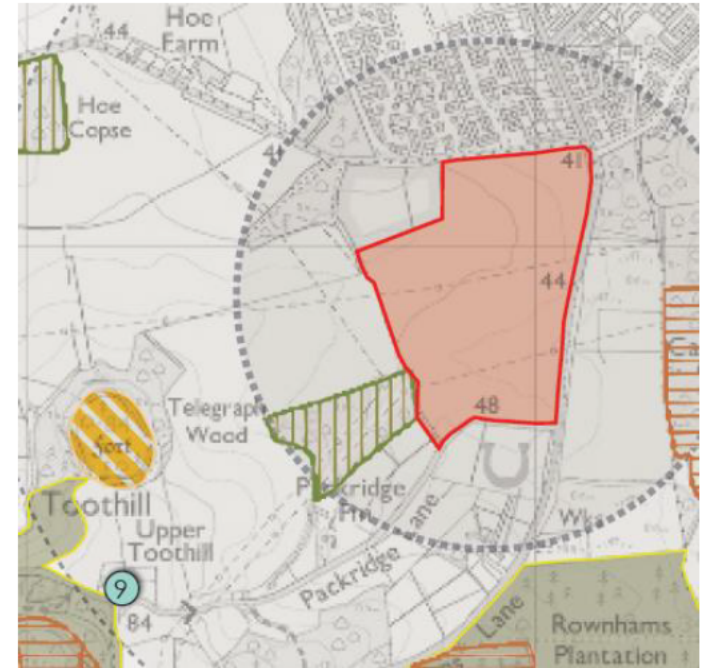


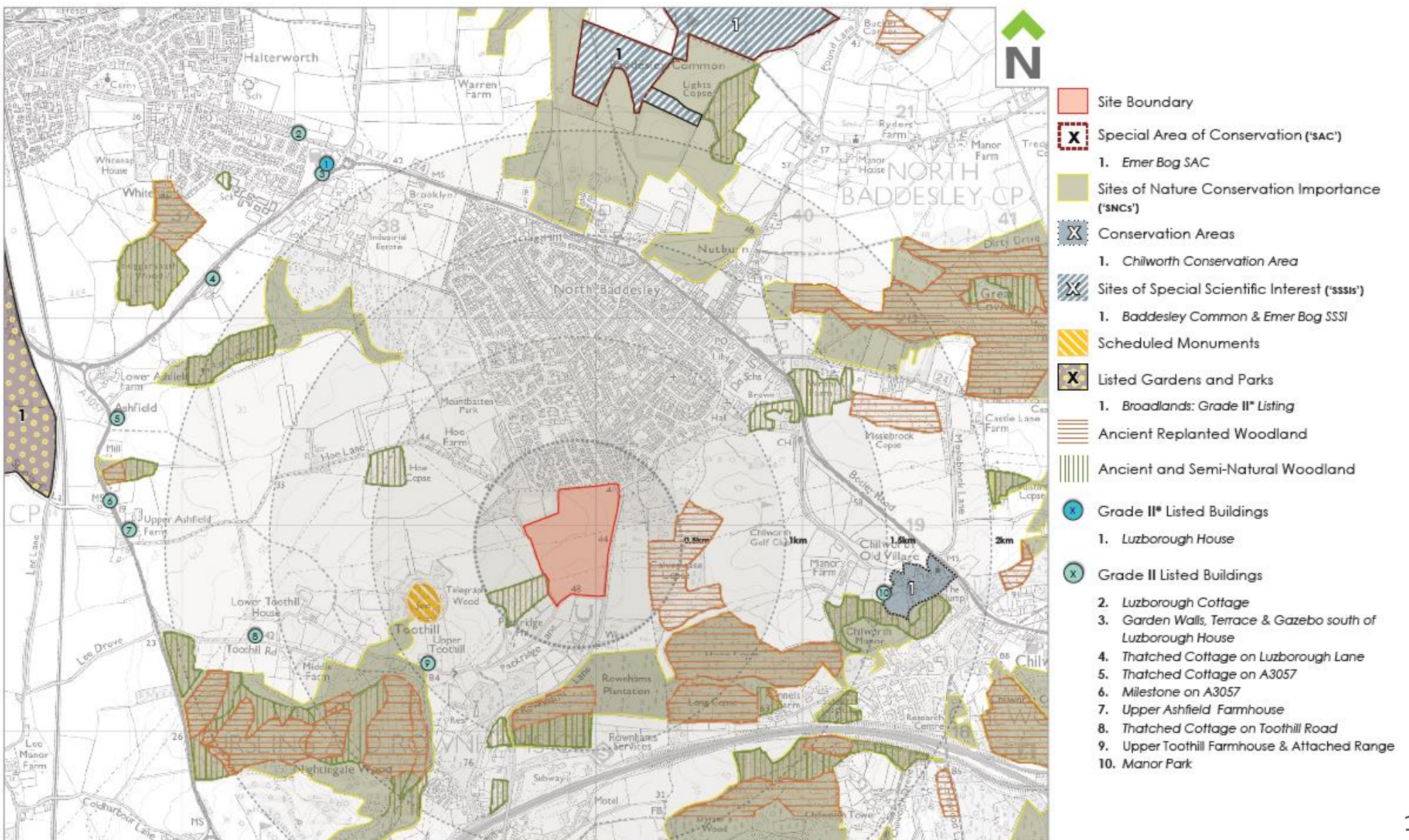
Figure 19: Heritage Map



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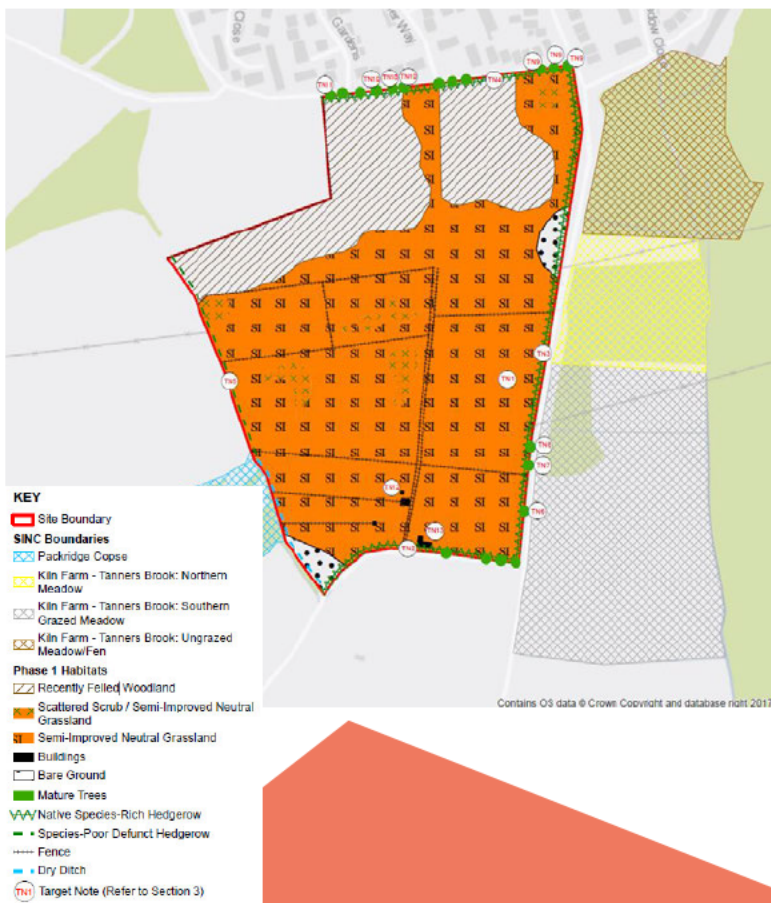
3.3 HERITAGE

Figure 20: Heritage Map



3.4 ECOLOGY

Figure 21: PEA Habitats Map



A Preliminary Ecological Appraisal has been carried out by ECOSA and concludes that the presence of semi-improved grassland, mature boundary hedgerows and mature trees means that the site is assessed as having medium ecological value overall. The report also acknowledged the proximity of Packridge Copse SINC.

It is recognised that the site's habitat has potential to support various protected species especially the existing trees and hedgerows along the site's boundaries (see adjacent plan), most notably potential foraging and commuting routes for bats.

The summary of the ecology report is that, subject to the findings of recommended survey work, it is considered that there is scope within the proposals in order to provide suitable mitigation in order to ensure the proposals accord with current planning policy in relation to ecology.

The updated masterplan would constrain residential development to the northern part of the site where there are less ecological features in comparison to the remainder of the site. This means that there could be a reduction in the amount of mitigation required and there is more capacity in the remainder of the site to deliver mitigation as needed. As part of the proposals a biodiversity management plan will be produced which will enhance the ecological value of the site through improved management and enhancement of the existing habitat.



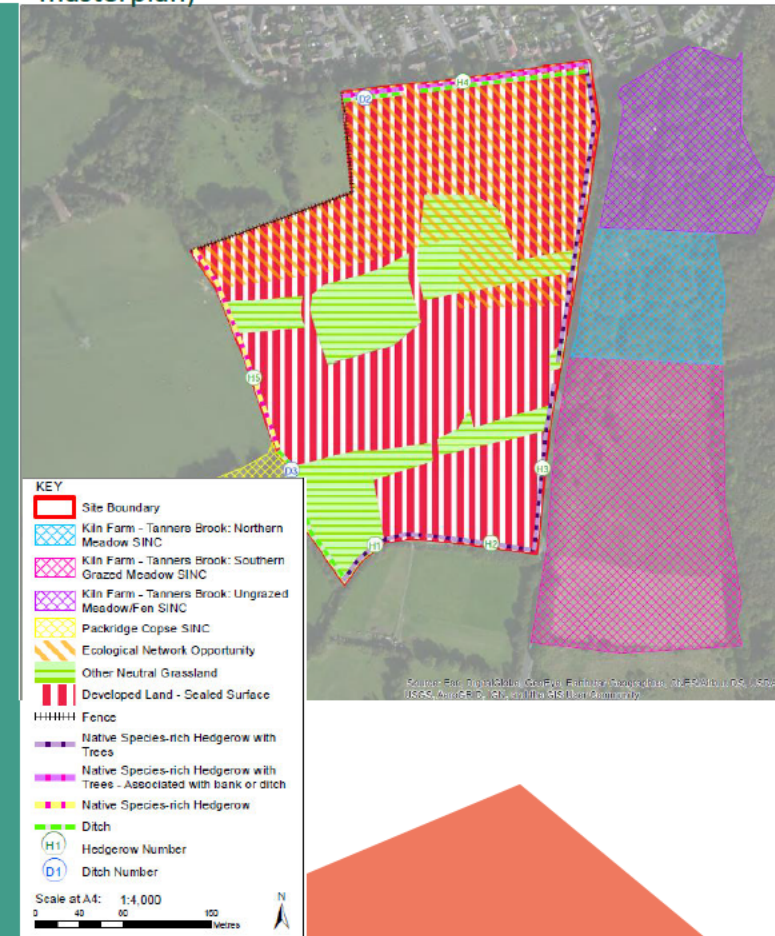
3.4 ECOLOGY – BNG

A Biodiversity Net Gain Assessment has been carried out by ECOSA on behalf of Persimmon Homes. The site is able demonstrate a 10% BNG for the hedgerow units and river units.

Since this assessment was undertaken, we are now seeking to reduce the developable area of the site, with residential development located north of the power lines. This reduced developable area offers to opportunity to deliver additional net gains in biodiversity.

Further work is on-going to regards to BNG in relation to habitat units on-site and to better understand the potential net gains of the revised masterplan.

Figure 22: BNG Assessment Plan (for previous masterplan)



3.4 ECOLOGY - NITRATES

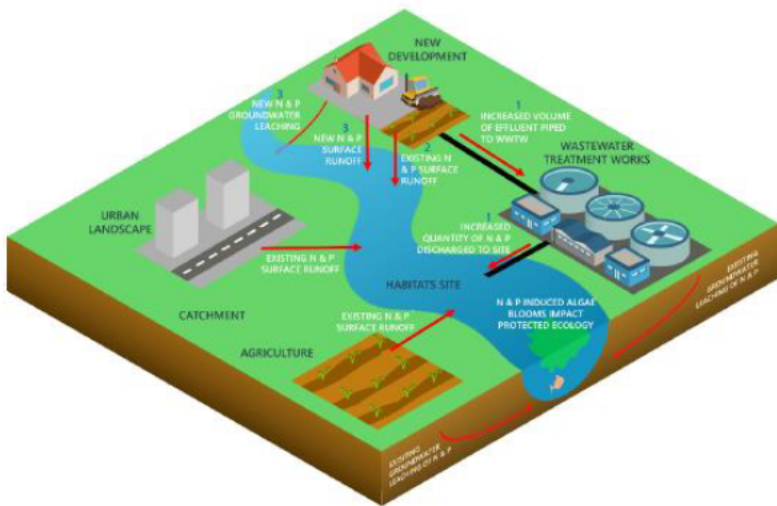


Figure 23: Nutrient Neutrality impacts

While a full assessment of nutrient neutrality is yet to be undertaken as part of the updated masterplan proposals, the reduced development area, alongside recent changes to Natural England's calculator, mean that there is the potential for nutrient neutrality to be secured on site through the removal of existing agricultural land.

We are currently undertaking an assessment of the updated masterplan. As per our previous statement, we are currently in discussion with third party providers regarding off-site nitrate credits if required.



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3.5 UTILITIES

Figure 24: Utilities Location Plan



4.3 Illustrative Masterplan

Figure 25: Packridge Farm Masterplan



4.4 SUSTAINABILITY

The Packridge Farm scheme will provide a number of benefits and, as summarised below, will deliver the sustainable development objectives set out in the NPPF.

Economic Role

- Provide much needed family and affordable housing for up to 170 dwellings.
- Provide appropriate contributions towards local infrastructure and ensure long term viability of local services.
- Create direct construction employment.
- New residents increase overall expenditure on local goods / services.
- Provide Council Tax receipts and New Homes Bonus.
- CIL and Section 106 contribution would also likely be provided to the Local Authority.

Figure 25: Sustainability Diagram



4.4 SUSTAINABILITY

Figure 26: Social Sustainability



Social Role

- The site is well connected to adjacent residential development and local services, including North Baddesley local centre;
- The site is well serviced by local footpaths and cycle routes, and proximity to bus stops with high frequent bus services, to encourage sustainable travel;
- The site would deliver much needed high quality homes, including affordable housing, and create a positive built environment for future residents, whilst protecting the amenity of existing residents;
- The site can deliver high quality and accessible open space including informal open space, children and teen provision and SANG to serve the new residents and those who live nearby;
- Development will help support local services;
- The site will deliver much needed affordable housing which meet the policy requirements set out by the Council;

4.4 SUSTAINABILITY

Environmental Role

- The site will be developed in a way to mitigate any environmental harm. The extent of residential development will be constrained to the north of the site to minimise wider landscape impacts and impacts on heritage assets.
- A phase 1 ecology study has been undertaken and the recommendations have helped shape the masterplan.
- The site will be environmentally sustainable through the provision of energy and water efficient buildings. New homes can be of timber frame construction, which are prepared in a factory setting, which reduces environmental impact and waste. The construction techniques employed in the new development will help to meet climate change minimisation goals.
- The site can deliver substantial new green infrastructure through the provision of new areas of open space, SANG, enhanced biodiversity, sustainable habitat and SuDS features and will allow for ecological enhancements.
- As a consequence of the SANG and open space, the remaining gap between North Baddesley and Rownhams would be secured in perpetuity.
- Delivering extensive bio-diversity net gain through extensive planting on site and converting agricultural land to ecologically more rich environments; and
- Providing nutrient neutrality through the loss of agricultural land

Figure 27: Environmental Sustainability



4.5 DELIVERABILITY

Figure 28: Housing Delivery



Central Government PPG states that for a site to be considered deliverable it must be suitable, available and achievable. The Council's most recent SHELAA highlights that the site is deliverable when considered against these three measures.

SUITABILITY – the site is adjacent to the existing settlement boundary which is a highly sustainable location. There are no identified major constraints that would prevent development coming forward at the site.

AVAILABILITY – The site is in single ownership and Persimmon Homes have an option covering the whole area, which allows us to promote and subsequently develop the land. There are no known legal / ownership constraints which would prohibit development from coming forward.

ACHIEVABILITY – The site is viable. Persimmon Homes has a proven track record of site delivery, nationally and locally.

5.0 SUMMARY

The site has been subject to a number of detailed technical assessments, which have not highlighted any insurmountable constraints to development. The site is described in Test Valley Council's SHELAA as being suitable, achievable/viable and available now for development. The proposal represents sustainable development under the definition of the NPPF and can provide a number of social, economic and environmental benefits. The site is located close to a variety of services / facilities and public transport opportunities, and is capable of facilitating the delivery of new community infrastructure if this is required.

This Deliverability Statement has reviewed the context of the site, and looked in detail at the opportunities and influences that can shape the deliverability of new homes. The concept masterplan, which takes account of the site's strengths and influences, clearly demonstrates that a well designed residential development can be delivered.

The Site has been considered as a 'variable' allocation within the Sustainability Appraisal that supports the reg 18 Plan. The Council therefore recognised that it has potential to meet wider needs.



5.0 SUMMARY

Figure 28: Packridge Farm Concept Masterplan



The site area is capable of delivering approximately 170 new homes based on a density of 35 dph. The density applied to the design is a reflection of neighbouring development.

The scheme is deliverable as Persimmon Homes is one of the largest house builders in the country. The company's commitment to building houses means that the site can be delivered quickly following the grant of a satisfactory planning permission.

Persimmon Homes could proceed with an application swiftly. The site is capable of providing much needed housing (including affordable housing) in Test Valley and to deliver against unmet needs in neighbouring authorities. The allocation of the site for housing would also ensure that the new homes could contribute to Southern Test Valley 5-year land supply, which will help protect against speculative housing applications, including any that may come forward in and around North Baddesley.

5.1 CONTACT

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