



TEST VALLEY LOCAL PLAN 2040

REGULATION 18 STAGE 2



REPRESENTATIONS ON BEHALF OF

**HIGHWOOD AND HILLIER IN THE PROMOTION OF BRENTLEY
NURSERIES, JERMYNS LANE, ROMSEY**

APRIL 2024



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1.0 INTRODUCTION

- 1.1** This representation is submitted by Highwood on behalf of Highwood and Hillier in response to the Test Valley Borough Council (TVBC) Draft Local Plan 2040 Regulation 18 Stage 2 consultation.
- 1.2** This submission follows previous representations made as part of the Issues and Options and Refined Issues and Options consultations held in 2018 and 2020 and the Stage 1 Regulation 18 consultation in 2022.
- 1.3** Highwood and Hillier are jointly promoting redevelopment of part of Hillier Bentry Nurseries in Jermyn's Lane, Romsey to provide new warehousing and office facilities to modernise Hillier's existing nursery business at the site, facilitated by the construction of approximately 250 new homes to meet local needs.
- 1.4** The site has been assessed as 'developable' within the most recently published Strategic Housing and Employment Land Availability Assessment (SHELAA), ref. No. 344 and was taken into consideration as one of the preferred sites in Southern Test Valley beyond 'Stage 5' of the Council's 'Site Selection Process'. However, the process appears only to have considered the housing elements of the proposals and gives no weight to the significant employment benefits that will form a major integral part of the development and therefore the site's sustainability score overall. The site assessment process appears flawed in several areas meaning that Bentry Nurseries emerges lower in the Council's 'sequential order of preference' as set out in the Interim Sustainability Appraisal 2024 compared to other options in Southern Test Valley that will have much greater impacts should they become allocations in future.
- 1.5** Bentry is in a sustainable location on the edge of Romsey, offering high quality development that will not only help meet local and district-wide housing needs, but offer bespoke and unique economic and community benefits directly alongside proposed new homes.

- 1.6 The new business facilities for Hillier will ensure that an important local employer is retained within the Borough, building upon over a century of history at the site, securing an employment legacy for future decades.
- 1.7 The National Planning Policy Framework (NPPF) provides four tests that must be met for Local Plans to be considered sound. In this regard, it is essential that plans should be:
- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
 - **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
 - **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and be,
 - **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.
- 1.8 The following comments are designed to help strengthen the policies within the draft local plan to enable the Council to progress to Regulation 19 with a plan that is legally compliant and sound, consistent with national policy and guidance.
- 1.9 We would very much welcome an opportunity to work with the council on realising the benefits of the proposals being put forward at Brentry, as part of a sound local plan in line with the NPPF tests.
- 1.10 Our representations request that the council review their draft local plan policies and allocate the site at Jermyn's Lane to help deliver a sound plan ahead of Regulation 19 consultation and subsequent examination.

2.0 LEGAL COMPLIANCE

THE DUTY TO CO-OPERATE

- 2.1** The Duty to Co-operate is a legal requirement that obliges local authorities to engage constructively, actively and on an ongoing basis with neighbouring local authorities on cross-boundary, strategic issues throughout the process of local plan preparation.
- 2.2** National policy relating to the Duty is set out in the NPPF, supported by national planning practice guidance (PPG). Authorities are required to prepare Statements of Common Ground (SoCG) to show that plan policies have been prepared in cooperation with neighbours where cross boundary strategic issues exist, such as identifying housing and employment needs across a sub-region.
- 2.3** Test Valley are a member authority of the Partnership for South Hampshire, a voluntary partnership of councils (along with East Hampshire, Eastleigh, Fareham, Gosport, Hampshire County, Havant, New Forest, Portsmouth, Southampton, and Winchester Councils and New Forest National Park) who have recently concluded a suite of work on various strategic, cross boundary matters, including publication of a Spatial Position Statement and Statement of Common Ground between the authorities.
- 2.4** Whilst it is welcomed that reference is made in the emerging plan to the PfSH Spatial Position Statement of December 2023 and mention of the approximate 12,000 shortfall in homes to 2036 across the sub-region, it is not acceptable that TVBC as part of PfSH does not seek to make a contribution towards making up the identified shortfall, particularly in the south of the borough – and especially as East of Romsey is identified in the Position Statement as a ‘Broad area of Search for Growth’ by PfSH.
- 2.5** This risks the plan being found not legally compliant in terms of not fulfilling the duty to co-operate, but is also potentially an unsound approach to setting of a housing requirement and housing supply.

- 2.6 It is notable in this regard that the PfSH shortfall is only calculated to 2036 (where the TVBC plan period is 2040 and should be longer), meaning strategic policies (15 year minimum from date of adoption) should likely plan for an even greater level of unmet need.
- 2.7 East Hampshire District Council, another PfSH authority, have recently consulted on a draft Reg. 18 local plan that doesn't make any contribution towards meeting the identified unmet need either, (albeit an area which doesn't include a 'Broad area of Search for Growth' like Test Valley does, but which has a National Park constraint that Test Valley does not). If every authority across PfSH takes this approach, the shortfall will never be addressed.
- 2.8 To demonstrate legal compliance ahead of Reg. 19, the council should positively review whether any contribution can be made to unmet need arising from within the PfSH area and consequently allocate additional sites in the southern part of the Borough, to conclusively show that a credible process of co-operation has been undertaken and strategic issues arising from that co-operation have been properly addressed within the plan.

SUSTAINABILITY APPRAISAL

- 2.9 It is a legal requirement that policies set out in Local Plans must be subject to Sustainability Appraisal (SA), a systematic process that is undertaken at each stage of a Plan's preparation and which appraises the effects of a plan's policies on sustainable development, judged against reasonable alternatives.
- 2.10 The review of the Test Valley Local Plan should be based on the results of the SA process with clear justification for any policy choices made. It should be made clear from the results of the assessment why such choices have been made, whilst others rejected. The Council's decision-making and scoring outcomes set out in the SA should be clear, justified and robust, informed by a comparative and equal assessment of each reasonable alternative.
- 2.11 The Brentry site has been considered in the Interim Sustainability Assessment accompanying the Regulation 18 Stage 2 consultation under site reference 344. The

Interim SA process, along with the approach to site selection in relation to the identified spatial strategy, and the approach to establishing local housing need is discussed later in these representations.

3.0 THE PLAN PERIOD

- 3.1 The local plan (and associated updated LDS, Nov 2023) has an optimistic projected adoption date of Q2 2026 (as also stated in Fig.19 on page 9 of the Plan), with an end date for the plan period up to 2040.
- 3.2 This is contrary to Paragraph 22 of the National Planning Policy Framework (NPPF) which requires strategic policies to look ahead over a minimum 15-year period from adoption – not the date of submission for examination.
- 3.3 Considering the prolonged duration of time it has taken the council to reach this current stage of plan formulation (Appx 1 of the LDS shows it began the review process six years ago in 2018 and consulted on other Reg.18 versions of the plan in 2020 and in 2022), it would surely be prudent and more robust an approach to extend the plan's timeframe as a precautionary principle to ensure that paragraph 22 of the NPPF is complied with.
- 3.4 Our suggestion is that the plan's timescale be extended by at least an additional two years, concluding in 2042.
- 3.5 Strategic policies (including housing supply policies) need to be reviewed accordingly – the housing requirement will need to be recalculated and additional housing allocations set out within the Local Plan to meet the need arising from an extended period. So a two year extension would result in an uplift of 1,100 new homes needed using 550 dpa.
- 3.6 This is a fundamental matter and therefore important to consider at this stage (rather than later which could lead to further delays ahead of adoption) to ensure sufficient homes are planned for in the next Reg. 19 stage of the plan sufficient to provide for a minimum 15-year period from adoption.

4.0 THE SPATIAL STRATEGY AND SETTLEMENT HIERARCHY

SPATIAL STRATEGY

- 4.1 Highwood and Hillier strongly support the Council's confirmation that they will be pursuing a strategy that includes directing development to areas including Romsey, Andover and other larger settlements.
- 4.2 We support acknowledgement at para 3.12 of the plan and through the Settlement Assessment work undertaken that the market towns of Andover and Romsey as the largest settlements in the Borough, with the widest range and number of facilities, will be at the core of the spatial strategy and will continue to be a focus for development.
- 4.3 Please see our separate representations on flaws in the approach however to meeting rural housing need and the lack of any proposed allocation for new homes in the particular case of Stockbridge.

SETTLEMENT HIERARCHY

- 4.4 Highwood and Hillier support the identification of Romsey within the "Spatial Strategy Policy 1 (SS1): Settlement Hierarchy" on p.38 as a Tier 1 settlement, suitable for strategic allocations, windfalls and strategic/small scale employment.
- 4.5 As set out in our previously made representations, development at Jermyns Lane Romsey proposed by Highwood and Hillier provides an opportunity to realise the aspirations set out in Chapter 3 of the draft plan.

5.0 MEETING HOUSING NEEDS

- 5.1 The use of the Standard Method (as required by the NPPF) to calculate housing need and the commitment to meet the need derived from the Standard Method is supported.
- 5.2 We also agree that the Standard Method calculation needs to be regularly reviewed based on the latest information (for example updated affordability data).
- 5.3 However, we continue to be very concerned that TVBC continue to contend that there are no ‘exceptional circumstances’ to justify a higher housing requirement. The factors resulting in our argument at the Reg 18 stage 1 consultation remain not just valid, but have worsened, making the imperative of increasing the district housing need higher.
- 5.4 The PPG is clear that the Standard Method ‘provides a minimum starting point in determining the number of homes needed in an area’ which the draft plan recognises at para 3.54. In respect of unmet need, paragraph 61 of the NPPF is also clear that ‘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’.
- 5.5 Reflecting our comments made above on timescales, the outputs of the standard method should be updated and the minimum number of homes to be provided uplifted to reflect a later end to the plan period to ensure 15 years from date of adoption consistent with paragraph 22 of the NPPF.
- 5.6 This means that Table 3.3 ‘Housing Requirement and Supply’ and Policy SS3 would need to be updated to include a further two years of requirement and therefore an uplift of 1,100 homes (at 550 dpa) to the housing requirement, plus any contingency considered necessary.

UNMET NEEDS

5.7 Highwood and Hilier maintain that TVBC should be meeting some of the significant unmet housing needs arising from their neighbouring authorities.

5.8 The NPPF, point (a) of paragraph 35 is clear that plans should be:

‘a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development’ [our emphasis].

5.9 NPPF paragraph 67 goes onto state:

‘The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.’

5.10 Paragraph 5.34 of the Interim SA states that,

“The discussion of strategic / top down factors presented above does not provide any clear basis for exploring scenarios that would involve setting the housing requirement at a figure above LHN. However, for South Test Valley only, the possibility should not be ruled out, given ongoing uncertainty regarding unmet need. This matter is discussed further below in relation to broad distribution and growth scenarios for the north and south of the plan area.”

5.11 Paragraph 5.79 states that,

“Test Valley Borough Council is engaged in ongoing discussions regarding housing provision and unmet need with neighbouring authorities including the PFSH (Partnership for South Hampshire) authorities. As concluded in the previous section, there is currently no definitive unmet housing need from neighbouring authorities to accommodate in Test Valley. However, there is potential for unmet housing need from south Hampshire

authorities to be identified during preparation of this plan. Therefore, it is appropriate to identify and appraise reasonable alternative growth scenarios in the south of the plan area only. However, these growth scenarios would need to be reassessed if definitive unmet need is identified during the preparation of the Test Valley Local Plan 2040.”

- 5.12 It is true that LPA's in the PFSH area are at different stages of plan making, but this is an inevitable function of the disparate plan making system in England and is not an excuse for delaying meeting unmet needs that adversely affects the affordability of housing in all areas. The PFSH December 2023 Position Statement still reports a shortfall in housing of nearing 12,000 units (based on a period only up to 2036) and it is not clear how a point where a 'definitive unmet need' is ever going to be identified without a proper process for sub-regional co-operation.
- 5.13 The biggest deficit arises from New Forest District which has a shortfall of 5,652. Given the New Forest District plan was adopted relatively recently (July 2020) and given the constrained nature of the district, the majority of which is within the New Forest National Park, it is unlikely that this need is going to be met within New Forest District any time soon, whilst Test Valley on the other hand have an opportunity to help address some of this need, being an adjoining authority with no such national constraints in play.
- 5.14 Southampton, TVBC's southern neighbour, has also requested TVBC explore options for a higher housing number, presumably to assist in meeting unmet needs arising there. This also means it is very unlikely Southampton, which is constrained by its urbanised nature, will take on any of the unmet need arising from the New Forest District. Havant Borough Council have also made a formal request for TVBC to help meet their unmet need of circa 2,000 homes.
- 5.15 All of this points to an exceptional need for housing in the area which is continuing to remain unmet. Councils have a Duty to Cooperate (see our comments above) and there is at this time insufficient evidence that TVBC have seriously engaged and collaborated with its neighbours on how to address the pressing cross-boundary strategic matter of housing need.

- 5.16 Test Valley is also, as previously set out on the representation made to the Stage 1 consultation, significantly less constrained – arguably being the least constrained of all of the PfSH authorities. Its suitability for accommodating unmet needs is demonstrated by the recently agreed PfSH Statement of Common Ground (December 2023) which identifies, two potential greenfield ‘Broad Areas for Growth’ within Test Valley at Romsey and Chandlers Ford, out of a total of only five identified areas in South Hampshire. This demonstrates that Test Valley is the most suitable and sustainable location for meeting a reasonable proportion of South Hampshire’s unmet need.
- 5.17 This alone represents a clear reason to seriously consider increasing the housing requirement for the plan period to assist in meeting this need. TVBC has a significant opportunity to help meet as yet unmet needs within their boundaries within the STV HMA.
- 5.18 Whilst to date, only Havant borough have made a request for TVBC to meet any potential unmet housing needs, there surely must be a significant possibility that TVBC, being a relatively unconstrained authority area will need to accommodate unmet needs of the wider sub-region. It is noted that this position has not been considered in the SHMA (2022).
- 5.19 TVBC should not wait for several ‘requests’ to meet unmet need from other local authorities through SoCGs, given the level of unmet in the area is already well understood and acknowledged through PfSH, but instead should be proactively planning to meet the already identified shortfall. Failure to do this will undermine the soundness of the plan.
- 5.20 Therefore, the council must proactively explore with their neighbours now how TVBC can help meet the unmet needs of the sub-region. Failure to do so risks further embedding the shortage of housing in the area, reducing the affordability of housing both in Test Valley and regionally and as suggested in earlier sections, risks a plan being progressed that is not legally compliant or sound.

AFFORDABILITY

- 5.21 The evidence produced by the Council in support of the latest draft and summarised in the Housing Topic Paper highlights a stark fact – **the absolute affordable housing need alone in the District is 652 dwellings per annum.**
- 5.22 The Housing Topic paper, irrationally, appears to argue at 3.15, that because this need cannot realistically be met and because there is unlikely to be sufficient market demand for the level of overall housing that would be required to meet the affordable housing need, this, TVBC consider, means it is not appropriate to increase the housing requirement at all.
- 5.23 Whilst it is appreciated there *may* be justified reasons for not increasing the overall housing requirement to try and accommodate all the affordable housing need, this is not a reason to not seek any uplift at all to meet a greater proportion of the currently dire need for affordable housing in the district. The SHMA (2022), whilst not setting a target, states ‘...that affordable housing delivery should be maximised where opportunities arise.’
- 5.24 Viable market led developments are the surest way of maximising affordable housing delivery. Market led sites would help better address the acute affordable housing need in a sustainable way.
- 5.25 It is commonly acknowledged that housing affordability in the south-east region has worsened since before covid, and this includes Test Valley where the latest house price to earnings data shows for the district as a whole house prices are on average 9.39 times average earnings – up from a ratio of 4.93 in 1997.
- 5.26 A review of house price data (Rightmove, March 2024 using HMLR sources) suggests average values in Romsey of £395,191 compared to the district median house price of £315,000 quoted in the SHMA indicating a particular issue with affordability in Romsey.

CONTINGENCY

- 5.27 In addition to the above, TVBC should carefully consider whether a 10% contingency buffer to their housing supply to help make sure their requirement is met is sufficient. The currently preferred approach relies disproportionately on new, larger, strategic sites, 81% of which are 800 or more units. Strategic sites of this size are inevitably more complex and take longer to commence. A local example is Whitenap. They also often require significant infrastructure to be delivered. It does not appear that sufficient consideration has yet been given to the risks of delays in delivery and how this could affect the supply of homes to meet the Council's housing needs.

CONCLUSION ON HOUSING REQUIREMENT – POLICY SS3

- 5.28 Taking our comments above into account, notwithstanding any consideration of unmet needs, affordability or contingency, an extended plan period of an additional two years to 2042 at 550 homes per annum would require an uplift in homes needed by 1,100 to 12,100.
- 5.29 The figure should be treated as a minimum to be exceeded where possible in order to significantly boost the supply of homes and the acute affordability issues affecting the area and this should be set out clearly in the policy and supporting text.
- 5.30 It is considered that considerably greater numbers of housing allocation should be planned for in the emerging Local Plan. Any unmet need from neighbouring authorities should be properly quantified, identified and included in the housing requirement so that a contribution can be made towards addressing such undersupply.
- 5.31 The needs of accommodation for older people should be quantified and identified within Policy SS3.

POLICY SS6

- 5.32 'Policy 6 (SS6): Meeting the Housing Requirement' will need to be reviewed ahead of Regulation 19 to ensure that sufficient housing land supply is planned for to meet the revised housing requirement arising from changes that will need to be made to the plan to address points we have raised in previous sections above, not least meeting unmet need from neighbouring authorities and an extension to the plan period.

6.0 SA SITE ASSESSMENT

HILLIER BRENTRY NURSERIES - BACKGROUND

- 6.1** The land at Brentry Nurseries, Jermyn's Lane, Romsey (site 344 in the TVBC SHELAA and Interim SA) has been promoted over a number of years.
- 6.2** A strategic allocation at Hillier Brentry Nurseries in Jermyn's Lane, Romsey for circa 250 homes and employment floorspace would provide a meaningful contribution towards future supply of both housing and employment floorspace for the borough.
- 6.3** The fact that such an allocation would provide significant benefits in terms of employment through the provision of modern new facilities for Hillier alongside the delivery of new homes is unique to this site.
- 6.4** Highwood have been working with Hillier and liaising with stakeholders, the council and technical consultees on proposals for the site, which is demonstrably available and deliverable as a result. There are no insurmountable constraints to development at the site that would prevent the site coming forward as proposed.
- 6.5** The site is demonstrably in a sustainable location on the edge of the largest settlement in southern Test Valley.
- 6.6** The partnership venture between Highwood and Hillier offers a superb opportunity. It will enable Hillier to upgrade its nursery operations at the site to become more sustainable and efficient as well as provide suitable office premises that will ensure a continued legacy and presence at Brentry for decades to come. It will deliver much-needed family housing on a previously developed site on the edge of Romsey, a sustainable location close to existing local facilities.
- 6.7** The site has unique attributes and is different from other 'housing' sites being considered through SA. The development offers Hillier an opportunity to modernise and adopt state-of-the-art processes and operations to ensure a lasting legacy at Brentry for the company for many years to come.

THE SITE AND PROPOSALS

- 6.8 Brentry is a large facility at 17 hectares of previously developed land, utilised currently as a nursery and cash and carry business. The site is well contained visually by mature vegetated boundaries on all sides. It is characterised by areas of extensive hardstanding, numerous large and small buildings of varying permanence and appearance, polytunnels and plant growing areas.



- 6.9 The site is contiguous with the settlement policy boundary, bounded on the west by the Ganger Farm development by Barratt and David Wilson Homes which includes sports pitches, a pavilion and new homes. Further west is residential development on Braishfield Road and the Abbotswood estate and local centre.
- 6.10 East of the site is a private fishery fish farm and several large properties set within woodland and extensive plots off the Straight Mile. To the south of the site is land in agricultural use with wooded boundaries and vegetated field boundaries.
- 6.11 Hillier is looking to invest significantly in the plant production technologies at Brentry – with a focus on increasing efficiency and competitiveness in the market.

The company is also looking to provide a suitable office building on the same site, ensuring a continued Hillier legacy at Brentry for years to come.

- 6.12** Due to the decision not to supply plants to other non-Hillier, rival centres and the requirement for increased automation, approximately half of the current Brentry site will become surplus. This is due to more intense land use, resulting in more production per square metre, as well as the necessity for locating automated areas on flat terrain.
- 6.13** Modern technologies will significantly enhance efficiency by automating time-consuming tasks like weeding, creating opportunities for upskilling labour. The necessary investment in new technology does not come cheap and, in order to achieve its aspirations, Hillier needs to realise a value from the surplus area of the site to fund the necessary improvements that will safeguard jobs and the strength of the business going forward. The agreement with Highwood to promote and deliver sustainable development on this surplus land forms an essential part of the business case.
- 6.14** Hillier sought a development partner to secure the modernisation aims for Brentry and chose Highwood thanks to a shared ethos and the company being a local, Test Valley company.
- 6.15** Highwood is a multi-award-winning, trusted property developer and constructor with a mission to make the Central South a better place to live. We develop high quality housing for the open market, build-to-rent and affordable sectors as well as specialist retirement housing and care home schemes. In recent decades we've delivered a portfolio of distinctive projects that are underpinned by sensitive development. With a focus that sits firmly on legacy and considered placemaking, we're helping to deliver significant benefits for the communities we serve that will endure for generations to come.
- 6.16** Highwood have a proven track record in the delivery of housing schemes in Test Valley and in the wider south Hampshire area, working with stakeholders and delivery partners, bringing forward infrastructure and facilities alongside new homes early in the development and construction process.

SUSTAINABILITY APPRAISAL AND SITE SELECTION ASSESSMENT

- 6.17 The Council’s Interim Sustainability Appraisal confirms that Brentry is one of the few sites taken forward beyond stage 5 of the Site Selection review process and one of the ‘preferred pool’ of sites. This conclusion is welcomed and not surprising given the sustainable merits of the site and location compared to other alternatives. However, we have some concerns over the approach taken to Growth Scenarios within the SA process and Site Analysis conclusions as set out within Appendix IV of the Interim SA.

Reasonable Growth Scenario Options Considered in the SA

- 6.18 Our concerns over the approach taken to the consideration of Growth Scenarios in the SA are set out below. There is some overlap with our comments on the Site Assessments in Appendix IV.
- 6.19 Paragraphs 5.92 onwards in the Interim SA explain that the following sites have been identified which have been held ‘constant’ across all growth scenarios in southern Test Valley:
- Land to north of King Edward Park/St James’ Park, Valley Park – 44 homes (SHELAA 295)
 - Land south of bypass, Romsey – 110 homes (SHELAA 154)
 - Ganger Farm, Romsey – 340 homes (SHELAA 284)
- 6.20 It is not entirely clear from the SA what process has led to the selection of these three sites as opposed to other possible permutations from the ‘preferred pool’, beyond a vague commentary on broad principles of approach.
- 6.21 For instance, in relation to Ganger Farm, it is notable that the site is entirely greenfield, with no existing buildings or hardstandings and is adjacent to SINC and Ancient Woodland constraints. The proposals are for 340 homes, but with no employment floorspace and very little by way of other community benefit beyond what would typically be associated with the delivery of (only) new homes. By contrast, development at Brentry would deliver significantly more (see previous

section) on what is a previously developed brownfield site in a similar location. It therefore seems odd to us that Ganger Farm was taken forward as a ‘constant’ site, when Brentry was not and it is not clearly set out in the SA why this choice was made.

- 6.22 Similarly, in relation to Land south of the Bypass, the site is subject to surface water flood risk that doesn’t appear to have been subject to any sequential test analysis as required by NPPF and PPG, has heritage constraints and provides no employment benefits beyond those usually associated with a site that delivers only housing.
- 6.23 Paragraph 5.97 outlines that the four site options identified as ‘variables’ in STV include:
- Brentry Nursery, Romsey – 250 homes (SHELAA 344)
 - Velmore Farm, Valley Park – 1,070 homes (SHELAA 82, 285)
 - Packridge Farm, North Baddesley – 150 homes (SHELAA 19, 255) 46
 - Halterworth, Romsey – 1150 homes – 1,150 homes (SHELAA, 139, 282, 356, 370).
- 6.24 Paragraph 5.101 states that of the ‘variable’ sites the following sequential order of preference can be identified:
- Velmore Farm, Valley Park – 1,070 homes (SHELAA 82, 285)
 - Halterworth, Romsey – 1150 homes – 1,150 homes (SHELAA, 139, 282, 356, 370)
 - Brentry Nursery, Romsey – 250 homes (SHELAA 344)
 - Packridge Farm, North Baddesley – 150 homes (SHELAA 19, 255)
- 6.25 Again, how this sequential order of preference was determined is not clearly set out in the Interim SA and the choice of order of preference itself appears flawed.
- 6.26 For instance, in relation to Brentry’s position in the order of preference, we believe that the site should be top of the list, given that:
- Brentry is a site with **extensive existing development upon it** – buildings, hardstandings etc and which is **well contained in the landscape and townscape** but this appears to be given scant weight in scoring or the Growth Options

analysis. See our comments below on individual site scoring for elements of the Brentry Site Appraisal in this regard.

- Brentry – unlike Halterworth or Velmore is **not within an identified Local Gap**. The commentary within the SA on the Gap analysis in paragraphs 5.102–5.103 is flawed. Either the Gaps are worth designating and retaining, or they are not. There are better alternatives (e.g. Brentry) available which would not result in any such impact on Gaps and settlement coalescence. This major landscape consideration is not given sufficient weight in the analysis or scoring for the individual sites, affecting the outcome of the Growth Scenario Option review.
- Brentry is **contiguous with the settlement boundary** shown on Inset Map 3 and adjoins existing sports and POS facilities at Ganger Farm, is **on a frequent bus route** and with improved linkages to the west (via Ganger Farm as proposed) will provide convenient connections to existing facilities in Romsey. It is surrounded on three sides by development and relates well to the urban area. In a world where Ganger Farm 284 is developed as intended in the plan, this becomes even more apparent.
- Brentry will provide **significant employment benefits** alongside those associated with the delivery of housing, through association with **Hillier**. This has been given **no weight at all** in the SA or Site Selection process and significantly underplays the benefits of Brentry compared to other alternative options. This is a major flaw in the assessment and undermines the credibility of the SA.

6.27 As an example, Paragraph 6.14 states,

“Halterworth is a ‘variable’ site option also located near to community infrastructure in Romsey. The site is better connected to the Romsey urban area than Brentry Nursery, however, it is not well connected by walking and cycling routes.”

6.28 We agree that Halterworth is not well connected by walking and cycling routes. The question then has to be asked, ‘how is Halterworth better connected to the urban area of Romsey, consisting as it does of new development on undeveloped and open green fields within a Local Gap without less defensible boundaries, when compared to Brentry?’.

- 6.29 This also applies to the consideration of Landscape (paragraphs 6.71–6.77). See our comments on this issue further below, but how can Brentry and Halterworth be scored the same on landscape character and sensitivity?
- 6.30 Consequentially, the flawed outcome on the ‘sequential order of preference’ has tainted the subsequent appraisal of Reasonable Alternative Growth Scenarios for Southern Test Valley set out in Table 5, which only considers Brentry tied in with other sites and a greater level of growth (with consequently greater impacts) under Scenarios 2 and 4. Brentry as an option therefore scores relatively poorly by association as a result – instead of being considered either on its own merits as a growth option or in other potential further Growth Scenarios. For instance, why not appraise a further scenario of ‘Velmore Farm + Brentry’ as opposed to ‘Velmore Farm + Halterworth’ which would also provide flexibility should further sites be needed in Romsey?

Site Assessment of Brentry Site 344 in the SA and Appendix IV

- 6.31 Our concerns regarding the robustness of the SA appraisal of the Brentry proposals are set out below with comments on other site appraisals also provided.
- 6.32 Site Appraisal – Employment Uses Y/N: In our previous submissions to the Council, we have made it clear that proposals will include new offices, warehousing and other associated modern employment-related upgrades to the Hillier operation at Brentry alongside the provision of new homes. This is a major and fundamental benefit of the proposals, securing the continued presence of a significant local business in the area. The Site Appraisal is undertaken without any reference being made to this important benefit. This is a fundamental flaw in the SA and should be addressed ahead of Regulation 19.
- 6.33 SA Objective 1: our latest proposals include 9no. age-restricted homes for over 55s to contribute towards meeting the critical need for specialist accommodation for older people, along with open market homes and an (at least) policy-compliant level of affordable housing of a range of size and type. We will be providing the Council with further information in due course to assist with SA review ahead of Regulation 19.

- 6.34 SA Objective 2: As per our comments above, the significant employment facilities proposed as part of the Brentry proposals needs to be given a ‘Strongly positive’ ++ score to reflect the level of employment benefits the site will deliver – which other sites will not. Scoring Brentry the same as other alternative sites is a significant flaw and distorts the outcomes of the SA process as a result.
- 6.35 SA Objective 3: It is proposed to connect footways and cycleways directly from the site into and through the adjoining land to the west on to facilities referenced in this section of the Appraisal. Scores should be reviewed accordingly. We will be providing the Council with further information in due course to assist with SA review ahead of Regulation 19.
- 6.36 SA Objective 4: It is noted in the SA that the Brentry site is previously developed land and a score of ‘Positive +’ is attributed. We would suggest given the clear thrust of national policy and guidance is to direct development to brownfield first ahead of greenfield that this should be given a more appropriate ‘Strongly Positive ++’ score to ensure that this merit of the site is given appropriate weight in the SA process compared to other less-attractive, green field alternative options.
- 6.37 SA Objective 8: The commentary on landscape character (Criteria A) in the Appraisal states,
- “The landscape is visually extremely contained and enclosed, and therefore is less susceptible to change in visual terms. Views are inward looking and kept short by the surrounding woodland, resulting in very low levels of intervisibility with the surrounding landscape. The parcel has a Moderate-High sensitivity to change arising from the scenario. Overall landscape susceptibility to change is judged to be Moderate-High. This is in view of the sense of time depth, pattern and relative naturalness created by the assessed landscape character, and the mostly weak relationship of the parcel to the settlement edge.”*
- 6.38 We would agree with the first two sentences. However, we strongly disagree with the view that the site has moderate-high sensitivity to change given the fact that it is enclosed visually (i.e. what landscape impact would there be?) and the nature of the current previously developed site which is covered with buildings, hardstandings, storage containers etc. There is a strong argument in favour of a view that the site will benefit in terms of landscape character from redevelopment.

- 6.39 Comparing the respective scores given to the proposed redevelopment of what is visually contained, previously developed land at Brentry to the green fields and Local Gap development at Halterworth, which will impact upon landscape, countryside and PRowS that are present there, it is surely flawed that the sites are given the same '+/-' score for this criterion. The score for Brentry must be reviewed and uplifted and/or the score for Halterworth amended to reflect the significant landscape impacts that development there would incur.
- 6.40 On Criteria B 'Does the site relate well to the existing settlement and to the immediate context/surrounding area?', Brentry is scored 'Negative -' as,
- "The site is not immediately adjacent to any settlement boundary and is located entirely within and surrounded by countryside".*
- 6.41 Inset Map 3 shows that the site is contiguous with the settlement boundary to the west and in a scenario where Ganger Farm Site 284 comes forward will be even more integrated with the settlement boundary. The site is previously developed and neighbours housing to the north, east and west. It should be scored 'Positive +', or at least '+/-', certainly not negative.
- 6.42 On Criterion C 'Does the site have the potential to impact the distinction between settlements, or lead to a risk of physical or visual coalescence, where this is relevant to settlement identity?' Brentry is given a '0' score as there is no effect. Another way of looking at this, is in positive terms given alternatives at Velmore and Halterworth will have impacts on Gap and coalescence. We would argue that a positive score should be given to Brentry, but also that a 'Strongly Negative -' score should be attributed to Velmore and Halterworth to reflect the significant nature of this consideration.
- 6.43 Objective 12 (c), on public rights of way, we have been liaising with HCC Countryside on providing PRow connections through Brentry and onto Ampfield Woods to the NE of the site to enhance the local PRow network. We will provide the Council with further details, but the site should be given a score uplift to 'Positive +' accordingly. By contrast, Halterworth which has a rural character PRow through its core is scored the same as Brentry, yet will severely impact the character of that PRow. It

should be scored 'Negative-' as a result, not +/- as current.

- 6.44 Halterworth Sites 370, 139, 356 and 282 – it would be helpful in Appendix IV at Reg. 19 to have a single appraisal and score for the cumulative site being promoted at Halterworth as a single entity, rather than separate parcels as currently set out.

Surface Water Sequential Test Requirement

- 6.45 At the time of writing, the sequential test applies to all sources of flooding, including surface water flood risk and this will need to apply to all of the Council's proposed allocations as well as to future planning applications. This does not appear to have been done. To ensure the plan is sound at Reg.19, all current proposed allocations should be reviewed for the presence of any surface water flood risk (not just those in Flood Zones 2 and 3) using EA flood mapping/SFRA and discounted from being allocations in the next iteration of the plan where there are reasonably suitable alternatives, i.e. where no such flood risk exists.

CONCLUSION ON SA

- 6.46 We welcome the statement at paragraph 7.6 that,
- “If unmet housing need is identified during preparation of the plan there may be a need to reconsider further growth scenarios for the southern HMA.”
- 6.47 This should be expanded to include all aspects that may lead to justification for an increase in the housing requirement such as an extension of the plan period to ensure 15-year post-adoption as well as unmet housing need.
- 6.48 Further growth scenarios should be explored to reflect our comments above.
- 6.49 Site assessments should be reviewed to reflect our comments above. In accord with paragraph 10.2 and 10.3 of the Interim SA, we will in coming weeks be providing the Council with further evidence to demonstrate the sustainable merits of the Brentry proposals to assist in the Local Plan Next Steps as described in Chapter 10 of the Interim SA.

7.0 CONCLUSION

- 7.1 Highwood and Hillier have welcomed the opportunity to participate in the TVBC Draft Local Plan 2040 Regulation 18 (Stage 2) consultation.
- 7.2 For the reasons set out in section two, the plan should proactively consider how TVBC can help meet the already identified unmet need in the South Hampshire region and in Southampton. There is no evidence to date that proactive engagement to help meet unmet need has occurred. Planning strategically across boundaries to meet housing need is clearly advocated in the NPPF and failure to do so risks undermining the soundness of the plan.
- 7.3 We support the focus on Romsey as the largest settlement with the widest range and number of facilities within STV to which most development is to be directed.
- 7.4 Amplifying the case made in previous representations, land at Jermyn's Lane, Romsey at Hillier Nurseries has the potential to assist the council in realizing their plan aspirations and we look forward to exploring the opportunities with TVBC and the local community in the coming months ahead of Regulation 19.