

TVBC LOCAL PLAN REGULATION 18 SUBMISSION ON BEHALF OF
ORCHARD (HIGHWOOD LANE) LTD, ROMSEY LTD, WEST COAST
DEVELOPMENTS LTD.

SUSTAINABILITY APPRAISAL

POLICY SA6 MEETING THE HOUSING REQUIREMENT

POLICY SA4 GANGER FARM

POLICY SA6 VELMORE FARM

March 2024

Summary

Sustainability Appraisal

- Objection. There is a lack of consistency in the application of the Sustainability Appraisal methodology
- The selection process of sites for allocations in the local plan is unclear and lacks justification.
- The selection of growth options has not identified reasonable alternatives and there is a lack of justification for those chosen and reasons why other options have been rejected
- There is no reasoned assessment of the performance of the growth scenarios against the strategic issues/topics identified.
- The choice of the preferred growth option is not clearly explained and is based on a poor consideration of the technical evidence
- The choice of strategic issues against which growth options are considered is not justified and introduces a degree of bias against some of the growth options
- There is a lack of reasoned justification for the identification of 'constants' sites and 'variable' sites within the growth scenarios selected
- There is a lack of reasoned justification for the selection of the allocation sites
- There is no assessment of the land at Halterworth as a single site in the SA to inform a fair comparison of the merits of the growth scenarios, or inclusion of the land at Warren Farm (offered as part of the package)

Spatial Strategy

- Policy SS1 Settlement Hierarchy. Support. The proposed settlement hierarchy is the cornerstone of TVBC's approach to delivering its spatial strategy and sustainable development. Romsey is placed in Tier 1 where the scale of development acceptable in principle includes strategic housing allocations.

Housing Distribution

- Policy SS6 Meeting the Housing Requirement. Objection. The Plan should be amended to include at Halterworth for housing. See plan attached.
- Policy SA4 Land at Ganger Farm. Objection. The proposed allocation is in a less sustainable location than the land at Halterworth
- Policy SA6 Land at Velmore Farm. Objection. The proposed allocation is in a less sustainable location than land at Halterworth, Romsey.

Local Gaps

- Policy ENV4 Local Gaps. Objection. The western boundary of the Romsey-North Baddesley Local Gap should be redrawn to follow Highwood Lane from Stroud School to its junction with Botley Rd

Introduction

1. This submission is made on behalf of Orchard (Highwood lane) Ltd, Romsey Ltd and West Coast Developments Ltd. It sets out its response to the Regulation 18 Part 2 Consultation on the Test Valley Local Plan published on the 6th February 2024.

Background

2. The Halterworth area has been the subject of a number of planning applications for residential development, an application for residential development for 59 houses in the north-west corner was refused, in 2011 ref 10/00623/OUTS, an application in 2014 for 116 homes in the south west corner ref 14/00842/OUTS which was refused in 2015. There is a current application for 270 houses on land at Lodge Farm ref 24/00174/OUTS. A number of SHELAA submissions have been made to TVBC as part of the review of the local plan.

The Sustainability Appraisal (SA) Process

3. The SA is a key piece of evidence which supports the policies and proposals of a development plan document. Indeed, it is the document which underpins the document being prepared in preparing a SA there are a number of requirements which should be satisfied including: identifying reasonable alternatives and explaining why chosen a preferred option and why other options have been rejected, understanding that it is an iterative process and clearly documenting the process at each stage. This should enable the reader of the SA to be able to understand how a local planning authority has arrived at its preferred position.

4. When assessing individual sites, it is important that it is done in a consistent way, that the assessment should be based on the existing situation and where mitigation is taken into account it should be clear where that is the case i.e. mitigation-off and a mitigation-on approach. Where mitigation is applied an uncertainty about its delivery should be assessed. In circumstances where additional information, provided by the promoters of sites, is relied upon to inform the decision-making process it should be made clear that is the case and to make available the information being relied upon.

5. A SA is intended to inform the decision-making process the outcome of which would be the delivery of sustainable development. It is not a precise process and involves a considerable amount of subjective judgement. However, if it is to perform its intended role, the judgements made and the outcome of the SA, need to be based on accurate information and the subjective assessments ones which can be reasonably attributed to the base information.

Where that is not the case the value of the SA and the decisions based upon it are significantly diminished.

6. In respect of each site assessment it is not clear where the relevant information contained in the technical reports such as the Transport Assessment, Infrastructure and Utilities Capacity, Air Quality Study and the issue of deliverability is recorded and how they have been taken into account see the site appraisals in appendix IV of the ISAR. With regard to key site appraisals at Halterworth and Velmore Farm, the recommendations of the Local Gaps Study and the conclusions of the Landscape Sensitivity Study do not appear to have been fully integrated into the assessment.

7. To make a positive contribution to the decision-making process an SA needs a number of attributes a key one being consistency when making subjective judgements and accuracy of the baseline information. The published SA includes many examples of inconsistent judgements which have an impact on the individual sites assessments. There are also examples of the use of inaccurate, out of date information and the omission of evidence commissioned to inform the SA.

8. A site appraisal for the land at Halterworth has not been published and it is assumed that one has not been undertaken. In that context, it is difficult to understand how its merits have been fairly assessed and then compared with other sites. The area comprises a number of parcels of land with each having its own site assessment. The performance of each will be different against the criteria of the SA objectives to that which would be achieved from a single site assessment.

9. An assessment of the land at Halterworth suggests that it performs as well if not better than other locations which have been proposed for development including Ganger Farm and Velmore Farm. The LPA assessment of the merits of the land at Halterworth is considered to be flawed and does not provide a sound basis for informing the growth scenarios.

Site Selection

10. The SA site assessments are critical elements in the process of identifying the preferred sites to be allocated as they inform the content of the growth scenarios.

11. The explanation of the site selection process is set out in two documents the Site Selection Topic paper and the Interim Sustainability Appraisal Report (ISAR) together with reference to earlier stages of the Regulation 18 Local Plan.

12. The approach taken by TVBC to arrive at a preferred option for meeting the housing requirement is set out in paragraphs 3.8-3.11 of the Regulation 18 Stage 2 local plan. The six broad distribution options identified in the Regulation Part 1 consultation were revisited applying a top down and bottom up approach. The top down approach covered strategic factors and the bottom up process included the assessment of the merits of individual site options in delivering the top down factors. The outcome of the process was to confirm the

proposed spatial strategy outlines in the option Regulation 18 Part 1 consultation remained the preferred approach.

13. That spatial strategy comprised a focus^[SEP] on supporting regeneration^[SEP] of Andover and Romsey town centres, supporting growth at key employment areas along with supporting growth at larger urban and rural communities throughout the Borough ref para 3.11 of the Regulation 18 Part 2 Local Plan.

14. The preferred spatial strategy provides the context for the site selection process which followed the SA.

15. The selection process comprised a number of stages at each of which sites were excluded that had been the subject of a site SA.

16. At Stage 3 sites were assessed against a number of constraints that were unlikely to be overcome and included: within Flood Risk Zones 2 and/or 3 and Ancient Woodland. The application of these constraints however did not rule out sites which had land included with areas of flood risk or Ancient Woodland such as Ganger Farm (Ancient Woodland) and Velmore Farm (areas at risk of flooding) emerge from the selection process as allocations.

17. At Stage 4 sites were tested for consistency with a number of the strategic factors as outlined in the ISAR paragraph 5.67

- The emerging strategy to maintain a focus at delivering sustainable growth at Andover and Romsey and tier 2 settlements
- a site is clearly adjacent to a settlement within Tiers 1 and 2 of the settlement hierarchy, ^[SEP]
- Development should be located proportionately in accordance with the settlement hierarchy with a primary focus in Andover and Romsey and proportionate growth in Tier 2 settlements. ^[SEP]

18. The first two factors are linked to the assumption that these settlements have the greatest potential to deliver sustainable development. There is no explanation of what proportionate growth comprises and what if any are the thresholds for determining when that growth exceeds the definition of proportionate.

19. The outcome of Stage 5 of the site selection process is a long list of sites recommended to be taken forward for further assessment. A preferred pool of sites was identified ref paragraph 5.70, Table 3 and Figure 6 of the ISAR. There is no content within the ISAR or the Topic Paper to explain how the preferred pool was arrived i.e.; why sites which recommended for further assessment were excluded

20. It would be fair to conclude that there were at least two further stages in the site selection assessment which resulted in the elimination of a number of sites such as the land south of Highwood Lane and the creation of the two-tier category of constants and variables for which there is no published methodology.

21. There is no reference to any selection process or criteria for what is a key stage in the decision-making process as it is from this preferred pool that the proposed site allocations are drawn. Paragraph 5.87 refers only to the overall process rather than the actual process which to selection of the preferred pool of sites.

22. The next stage involved the sieving of sites in the preferred pool, some sites were considered to be 'constants' and others variable. Again, there is no explanation as to how sites were included in either category or why sites were excluded. The assumption that a number of sites are constant i.e.; included within all the growth options and a number are 'variables' has the effect of restricting the testing and evaluation of scenarios.

23. The analysis of the site assessments forming the bottom up approach has had the effect of ruling out sites which compare favourably with sites which formed part of the preferred pool and shaped the content of the four Growth Scenarios.

24. This approach adopted by TVBC has restricted the assessment of reasonable alternatives as there is no scenario which explores a more dispersed approach across the Tier 1 and Tier 2 settlements which would be consistent with the strategic factors identified in paragraph 5.67 of the ISAR. This is a result of the relatively few sites which were in the preferred pool and then in the 'constant' and 'variable' categories.

25. The selection process is concluded for southern Test Valley in Figure 6 of the Site Selection Paper. It includes the sites proposed for development for housing in the Regulation 18 Part 2 local plan including land at Upton for 80 dwellings. A site which was not in the list of preferred pool and was not included in the Growth Scenario Testing.

Testing the growth scenarios

26. TVBC identified four growth scenarios to be tested. This approach adopted by TVBC restricted the assessment of reasonable alternatives as there is no scenario which explores a more dispersed approach across the Tier 1 and Tier 2 settlements which would be consistent with the strategic factors identified in paragraph 5.67 of the ISAR.

27. The assessment of scenario three includes land at Halterworth which comprises four individual sites. However, the ISAR does not appear to include an evaluation of the land as a single site, Appendix IV has four sites. If that is the case then it is not clear on what basis the merits of land at Halterworth was based. If Halterworth is assessed as a single site then in scenario 3 it performs better and results in a different more positive outcome

28. The assessment of the four growth scenarios is also the subject of testing against a number of issues which are set out paragraph 5.106 of the ISA Report, page 46 see below:

- . The appropriate growth strategy, in terms of quantum and distribution for Romsey
- . The appropriate overall strategy for southern Test Valley in terms of quantum and distribution

- . The merits of a large-scale mixed use strategic urban extension adjacent to the Eastleigh conurbation
- . The sensitivity of the Halterworth and Romsey/North Baddesley landscape gaps informed by the Local Gaps Study (2023)
- . Whilst there is currently no clear strategic case for setting the housing requirement above LHN there is merit in identifying reasonable growth scenarios in the south of the plan area that exceed LHN based on the supply of preferred sites in the southern HMA

29. Within the ISAR there does not appear to any specific systematic analysis of the performance of each scenario against the issues identified in paragraph 5.106. When that is done it is clear that the choice of preferred scenario is flawed.

30. The selection of three of the issues is not accompanied in any supporting text in the ISAR or is referred to in the Site Selection Topic Paper raises a number of important questions about how sound the outcome of the SA process is.

The appropriate growth strategy, in terms of quantum and distribution for Romsey

31. It is clear that TVBC have a concern regarding the impact of development over and above that is currently committed. However, it is unclear how the ISAR has assessed the issue of capacity or what if any the threshold is above which development could not be accommodated?

32. The application of this assumption has a significant impact on the selection of a preferred scenario. Scenarios which propose development that is located away from Romsey would be more likely to be assessed more favourably.

33. At the same time TVBC do not raise any issues of capacity of infrastructure or services and facilities in respect of other large settlements in southern Test Valley.

The merits of a large-scale mixed use strategic urban extension adjacent to the Eastleigh conurbation

34. It is not clear why an extension to Eastleigh within Test Valley should be singled out as an issue to be considered. In terms of comparing scenarios those which do not include such a proposal are clearly going to at a disadvantage. An analysis of the merits of an extension are not rehearsed in the ISAR, there is no commentary on what the benefits would be and no analysis of any adverse impacts on the Eastleigh conurbation.

The sensitivity of the Halterworth and Romsey/North Baddesley landscape gaps informed by the Local Gaps Study (2023)

35. The highlighting of a specific issue regarding this particular gap is not explained nor why the sensitivity of other gaps is not an issue. Having raised the issue it has the effect of putting

the land at Halterworth at a distinct disadvantage to sites located outside of that gap, including those that are located in other gaps.

36. There does not appear to be any justification for TVBC to raise a particular issue in respect of the Romsey-North Baddesley Gap.

37. A Local Gaps study was commissioned by TVBC to review the efficacy and effectiveness of the existing designated local gaps ref para 1.1.1. With regard to the Romsey-North Baddesley local gap there is no commentary which suggests that it is a particularly important local gap having regard to the other gaps in southern Test Valley. In response to the question to what extent does the local gap maintain a strategic function? The consultants view was that

‘The strategic importance of the Local Gap has been eroded in the south by cumulative developments both adjacent to the gap (light industrial development to the immediate south west) and within it (the solar array which is adjacent to the light industrial development).’

38. This analysis contrasts with the consultants view on the Southampton – Eastleigh Local Gap. They advised that

‘By virtue of its historic function as planned and managed landed estate (and associated legacy features of this) and the scale and density of the forestry and estate woodland, the Local Gap has a valuable strategic function in defining setting and individual identity of adjacent settlements.

39. The consultants when considering the potential for development at Halterworth where quite clear that the separation of Romsey and North Baddesley could be retained and advised that

‘Consideration could be given to amending the Local Gap boundary in the west of this gap, where the existing settlement edge has eroded the rural character. Highwood Lane creates a natural boundary within the gap, by virtue of its mature reed/wooded character. Amending this part of the Local Gap would not undermine the strategic intent or purpose underpinning it, as the inter-layered field boundary hedgerow vegetation at and beyond Highwood Lane helps reinforce the perceptual qualities of the gap.’

40. In the context of TVBC’s own commissioned report the sensitivity of the Romsey-North Baddesley Local Gap does not appear to be justified as an issue which would inform the assessment of growth scenarios.

41. The sensitivity of the landscape of southern Test Valley to change arising from the growth scenarios was considered in the Landscape Sensitivity Study January 2024 commissioned by TVBC.

42. The study advised that Halterworth was considered that in terms of ‘landscape value and landscape susceptibility, the overall landscape sensitivity to the change scenario is **Moderate**.’ ^[11]_{SEP} ref para 1.1.307.

43.This conclusion supports the view that the making the sensitivity of the gap a key factor in the SA process is not justified.

44.Growth Scenario 1, the preferred scenario includes Velmore Farm which is also located within a local gap. It is instructive to refer to the consultant's recommendations in respect of the importance of that gap.

'by virtue of its historic function as planned and managed landed estate (and associated legacy features of this) and the scale and density of the forestry and estate woodland, the Local Gap has a valuable strategic function in defining setting and individual identity of adjacent settlements.'

45.The Landscape Sensitivity Study considered that Vellore Farm in terms 'of landscape value and landscape susceptibility, this is a landscape of **High** overall sensitivity' ^[1]_{SEP} ref para 1.1.516

46.It is reasonable therefore to conclude that in comparing scenarios which include land at Halterworth there is no issue with regard to the issue of sensitivity of the local gap and if sensitivity of local gaps is an issue then development at Velmore Farm would be of greater concern.

47. Within the ISAR there does not appear to any specific analysis of the performance of each scenario against the issues identified in paragraph 5.106.

48.Paragraphs 6.11- 6.91 of the ISAR set out for each SA Topic a summary analysis of the merits of the four growth scenarios. In short scenario 1 is preferred over scenario 3 but the differences are marginal.

49.Section 6 of the ISAR sets out the performance of the scenarios against the SA topics. The overall conclusion is that there was little to choose between scenarios 1 and 3. This can be seen by reference to Table 9 on page 57 of the ISAR which is where the top down and bottom up approaches are brought together. Across the 13 SA Topics, Scenarios 1 and 3 were assessed the same against nine topics including transport and landscape. Scenario 3 performs better than 1 in terms of climate change adaptation and historic environment. Scenario 1 performs better than 3 in terms of employment and economy and housing.

50.The comparison is assumed to have been done without a specific single site bottom up assessment. On that basis, the difference between the two scenarios is; climate adaptation in favour of scenario 3, economy and employment scenario 1 and community and health scenario 1.

51.The assessment of scenario 3 should be reviewed and be undertaken with the benefit of a single site appraisal of the land at Halterworth. The site assessment should include the land at Warren farm to the east of Highwood Lane which has been offered as an integral part of the scheme although not proposed for development. Such an assessment is likely to show that scenario 3 performs as well as scenario 1. Halterworth has better access to facilities which should place it on at least par with Velmore Farm. It also performs as well if the

proposed employment allocation at Abbey Park is taken into consideration. Finally, with regard to performance under climate adaptation it is surprising that this does not appear to be feature as a positive consideration given that TVBC have declared a climate emergency.

52.The ISAR at paragraph 7.4 draws together the reasons why growth scenario 1 is preferred.

‘Scenario 1 is preferable as it provides a more balanced distribution development between Tier 1 and 2 settlements with less reliance on Romsey. This approach places less pressure on the infrastructure capacity of Romsey and enables more proportionate growth and infrastructure improvements across the main southern settlements.’ [13]
[SEP]

53.There is no commentary in the Topic Paper or the ISAR as to why over-reliance on Romsey is an issue or how the scale and location of development proposed elsewhere has been arrived at.

54.The is no explanation of how the proportionate growth strategic factor has been achieved. There does not appear to be any evidence or discussion of what would comprise a balanced distribution which would best meet the housing needs of STV and how each scenario performs. There is one Tier 1 settlement(Romsey) and four Tier 2 settlements (Chilworth, North Baddesley, Nursling and Rownhams and Valley Park). Housing is proposed in the form of site allocations only at Romsey and Valley Park, none at Chilworth and North Baddesley and a possible small allocation at Nursling. It is difficult to understand how the proposed housing allocations achieves a balanced distribution.

55.There is no evidence in the ISAR or in the supporting published material which supports TVBC’s position that there is an issue of capacity with Romsey’s existing infrastructure such that it is a constraint which shapes the spatial strategy. There is also no analysis of the infrastructure issues across southern Test Valley which would justify distributing development or how that development would address them

56.Section 7 of the ISAR is where the justification for the selection of the preferred scenario is outlined. Paragraphs 7.4-7.6 make the case for southern Test Valley. It is to be expected that this section of the ISAR would draw together all of the preceding analysis and present the final chapter in the story of how TVBC arrived at its preferred strategy and allocations. That is not the case.

57.The preferred choice is not consistent with the evidence base and attributes benefits to the preferred approach which have not been justified. The choice of scenario 1 is justified against the following.

Performs well in relation to SA topics and alternative growth scenarios

58.Table 9 in its current form shows that there is little to choose between the options and if a single site appraisal is undertaken for Halterworth scenario 3 would perform at least as well.

Velmore has some landscape sensitivities, but they can be addressed

59.This conclusion recognises that there is an issue in terms of impact on the landscape. It does not appear to take account of the advice in the Local Gaps Study and Landscape Sensitivity Study. The conclusion that the issues at Velmore Farm could be overcome via the master planning process is relying on the outcome of as a yet to be undertaken piece of critical technical work.

opportunity to deliver employment with scope for commercial development at Velmore Farm

60.Scenario 1 is considered by TVBC to be better than scenario 3 in terms of employment and economy, based on the potential for 1.5ha of land for employment use at Velmore Farm. However, TVBC is not entirely convinced that provision would be made. ref paragraph 6.6 referring to Scenario 1 observes that it ‘**may** provide some marginal difference in benefits through **possible** employment land and community facilities at Velmore Farm.’

61.The assessment of scenario 3 at a strategic level should take account of the proposed allocation of land south of Botley Road of 1.2ha for employment and an extension to Abbey Park of 5.9ha. Both sites are within easy walking distance of the land at Halterworth. There is greater certainty that these two sites would come forward as both are the subject of current planning applications. If that is done then scenario 3 is at the very least on a par with scenario 1.

performs slightly better than scenario 3 in terms of accessibility to community facilities and infrastructure by sustainable modes

62.On accessibility to services and facilities Halterworth is well-related and out-performs Velmore Farm if the assessment is based on relationship with existing facilities. The one exception is health facilities as there is a health centre closer to Velmore Farm when compared with Halterworth.

provides a more balanced distribution of development between tier 1 and tier 2 settlements. Less reliance on Romsey

63.There is no discussion in the ISAR of what is meant by a more balanced distribution of development, what the current issue is in terms of the location of development and the future needs of the communities in the very south of the borough. There is one Tier 1 settlement(Romsey) and four Tier 2 settlements (Chilworth, North Baddesley, Nursling and Rownhams and Valley Park). Housing is proposed in the form of site allocations only at Romsey and Valley Park, none at Chilworth and North Baddesley and a possible small allocation at Nursling. If the objective of the local plan is to provide a more balanced

distribution of development then the appraisal process should have included a scenario which reflected that.

64. In terms of the preferred scenario there is no justification as why it does represent a balanced distribution other than not all the development required is proposed at Romsey.

less pressure on infrastructure capacity at Romsey

65. There is no evidence in the ISAR or in the supporting published material which supports TVBC's assertion that there is an issue of capacity with Romsey's existing infrastructure being unable to support development over and above that proposed in the local plan or that further investment via development contributions would not address any specific issues. Indeed, the ISAR concludes that scenarios 3 and 4 would have a positive impact in terms of investment in Romsey.

66. There is no analysis of the impact of the scenario 1 on Eastleigh's infrastructure to accommodate the development

Conclusion

67. The SA and the process of site selection on which Policy SS6 is founded does not form a sound basis for the justification for the proposed allocations. The methodology is unclear and both should be reviewed.

Spatial Strategy

Policy SS1 Settlement Hierarchy.

68. The proposed settlement hierarchy is the cornerstone of TVBC's approach to delivering its spatial strategy and sustainable development. Romsey is placed in Tier 1 where the scale of development acceptable in principle includes strategic housing allocations. The approach is supported.

Housing Distribution

Policy SS6 Meeting the Housing Requirement

69. The SA and site selection process has resulted in the non-allocation at Halterworth, a site adjoining a Tier 1 settlement with no over-riding constraints. The principal reason for its non-allocation appears to be that it exceeds a capacity constrain that is not breached by the allocation at Ganger Farm and that better alternative locations are available.

70. The land at Halterworth is capable of delivering sustainable development at a Tier 1 settlement and is preferable to Velmore Farm.

Conclusion

71. The Plan should be amended to include at Halterworth for housing. See proposed masterplan and supporting statement for the land at Halterworth attached.

Policy SA4 Land at Ganger Farm.

72. The proposed allocation is in a less sustainable location than the land at Halterworth. The criteria of the SA have not been applied consistently the result of which is that the site appears to perform better when compared with other sites, eg criteria 10B) has a mixed score but elsewhere a site with similar characteristics receives a strongly negative score and similarly 10D) has a negative score but elsewhere a strongly negative score is given.

73. The site SA has assumed access via Ganger Farm Lane yet the current planning application shows a vehicle access to Jermyns Lane which the Highway Authority has expressed concerns.

74. The site is located on the north-east edge of Romsey which would mean traffic heading to the town centre, south or west would use the Winchester Rd and Southampton Rd experience congestion at peak times. The assessment that there are no air quality issues which is surprising and needs to be justified.

75. There is no justification why the site is placed in the 'constant' category and is included within all the growth scenarios and why other sites of very similar/same merits in terms of the spatial strategy are excluded. When comparisons are made ref paragraph 5.99 they are done so with sites much in scale, and in respect of Romsey are ruled out because of the implied capacity constraint

Conclusion

76. The allocation of land at Ganger Farm should be deleted.

Policy SA6 Land at Velmore Farm.

76. The proposed allocation is in a less sustainable location than land at Halterworth. The selection of the site is based on an assessment which has not been the subject of the consistent application of the methodology. It has taken into account a submitted master plan rather than the existing position which has resulted in it having a more favourable assessment than sites where a masterplan has not been submitted.

77. The assessment in attributing mixed 'score' regarding impact on the landscape and a negative score on the impact on the local gap does not fully reflect the Landscape Sensitivity

Study or the Local Gap Study. A strongly negative 'score' would be a more accurate recording of the impact in respect of both criteria.

The consultants advised that

'Considering the above discussion of landscape value and landscape susceptibility, this is a landscape of **High** overall sensitivity. This is by virtue of the elevated character of the open landscapes which define the western, north-western, south-western and central parts of the site, together with the experience of relative remoteness and sense of place provided by landscape pattern (including the presence of the Roman Road) ^[SEP]ref paragraph 1.1.516

78. With regard to the Southampton-Eastleigh Local Gap the consultants conclude that:

'By virtue of its historic function as planned and managed landed estate (and associated legacy features of this) and the scale and density of the forestry and estate woodland, the Local Gap has a valuable strategic function in defining setting and individual identity of adjacent settlements.' ref page 58.

79. In proposing development at Velmore Farm TVBC have relied upon it providing a more balanced distribution of development in the south of the Borough. There is no explanation of how and why the allocation of the site for over 1000 homes achieves a balance of provision across southern Test Valley or what criteria were used to arrive at that judgement.

80. There is also no clear justification why an extension to Eastleigh within Test Valley should be singled out as an issue to be considered when assessing the merits of sites. Having identified that it is a factor which has led to the proposed allocation of Vellore Farm there is no analysis of the impact of the development on the urban area of Eastleigh or what benefits it would bring such that they overcome the shortcomings of the site in terms of the SA objectives. In terms of comparing sites those which are not close to the urban area of Eastleigh would be assessed less favourably.

Conclusion

81. The allocation of land at Velmore Farm should be deleted

Policy ENV4 Local Gaps, Romsey- North Baddesley Local Gap

82. The policy proposes a local gap between Romsey and North Baddeley ref Inset Map 3. It includes the land between Halterworth Lane and Highwood Lane.

83. TVBC commissioned consultants Stephenson Halliday to undertake a Local Gaps Assessment (December 2023). The report set out a number of criteria against which the merits of the existing local gaps were reviewed. It also took account of planning decisions where development in a gap had been permitted or refused.

84.They concluded that the strategic importance of the gap has been eroded by development of the Abbey Park Industrial Estate and solar farm and that its contribution to settlement identity has been weakened by development within it.

85.One of the key elements of Policy ENV4 is to maintain the physical and, or visual separation of settlements. The consultants advised that the intervisibility between the two settlements was limited by the existing landscape features on the settlement edges and the tree and hedgerow lined A27. In considering what defensible boundary features there were within the current gap the consultants highlighted the ‘tree lined Highwood lane’.

86The development of land south of Highwood Lane whilst extending the built-up area boundary of Romsey would still mean that in this location it would remain west of the existing boundary of the Abbey Park Industrial Estate and the proposed extension as set in the local plan.

87.The consultant’s recommendation was:

‘Consideration could be given to amending the Local Gap boundary in the west of this gap, where the existing settlement edge has eroded the rural character. Highwood Lane creates a natural boundary within the gap, by virtue of its mature treed/wooded character. Amending this part of the Local Gap would not undermine the strategic intent or purpose underpinning it, as the inter-layered field boundary hedgerow vegetation at and beyond Highwood Lane helps reinforce the perceptual qualities of the gap.’ The existing landscape features on Highwood Lane can be enhanced with additional boundary planting further limiting any views of the site from the A27.’

88.The analysis of the gap and the recommendations are supported. The development of land south of Highwood Lane would still mean that the edge of Romsey in this location would remain west of the existing boundary of the Abbey Park Industrial Estate and the proposed extension as set in the local plan. The existing landscape features on Highwood Lane can be enhanced with additional boundary planting further limiting any views of the site from the A27.

Conclusion:

89.The local gap boundary between Romsey and North Baddesley should be revised to exclude the land between Halterworth Lane and Highwood Lane.

Proposed Strategic Housing Development at Halterworth, Romsey V2

Introduction

In its latest consultation on changes to the NPPF, the Government has reaffirmed that the main purpose of the planning system is to deliver sustainable development. The review of the current local plan provides an opportunity for Test Valley Borough Council to consider how it can meet the future needs of its residents in a sustainable way and take a leading position in sustainable development.

Romsey is a highly sustainable location in southern Test Valley offering a range of facilities and services. Further development in or around the town would not only compare strongly with land elsewhere in the area, in terms of delivering sustainable development, but would also support Romsey's development as a thriving community. Development around Romsey would also allow the Council to directly support the Government's recent climate change commitment to radically cut the country's carbon footprint by 2035.

This submission promotes the allocation of the land for development on the eastern side of Romsey, between Halterworth Lane and Highwood Lane, in support of the Council's requirement to make provision for additional housing in the new local plan.

This paper sets out in broad terms how the land in this area, which has been included within individual SHELAA submissions made to the Council, can come forward in parallel with additional open space. It is recognised that in the latest Local Plan consultation (Reg 18 Part 2) the site was considered as an alternative option but was rejected by the Council in favour of a site at Velmore Farm, Valley Park which, in the Council's view, had very similar attributes.

It is considered however that the site at Halterworth was not properly evaluated (see Local Plan submission on behalf of Romsey Ltd, Orchard Homes Ltd and West Coast Developments Ltd) in the Council assessments and failed to fully consider the benefits of the whole site including Warren Farm, or the benefits of providing development at Romsey.

The Proposal

The land at Halterworth has been promoted through previous local plan reviews but has not been selected despite scoring highly in the Council's sustainability appraisals. The current proposal represents a significant change compared with previous submissions in that all of the land within the proposed allocation is now optioned to developers or has a landowner willing to develop. These controlling interests have agreed to work together in bringing forward a comprehensive development proposal.

A second major change to previous schemes is that the proposal now includes the majority of Warren Farm to the east of Highwood Lane. It is proposed that this area of land to the north of Botley Road and totalling over 90ha, could be used for a variety of purposes to enhance and benefit the housing development, including recreation provision (SANG), Biodiversity Net Gain (BNG), ecological enhancement, educational facilities, nitrate mitigation, dedicated solar generation, power distribution and storage – working in association with SSEN, and the retention of a local gap. Coupled with the

balance of Warren Farm (20ha) to the south of Botley Road, it is also proposed that extensive new public access routes will be provided.

The overall scheme will provide a very large area for public recreation and access stretching from Green Lane in the north to the Luzborough Plantation in the south. It is considered that the proposed open space area will absorb recreation pressure from the new development and reduce the potential impact of the scheme on both the Emer Bog SAC and the New Forest. This element is especially important with the pressure on local recreation spaces which has become apparent through the covid crisis. This part of the proposal directly meets some of the objectives outlined in the Green Infrastructure Strategy for Test Valley (2014 – 2019) TVBC 2014.

The potential benefits of the scheme also include the following:

- A commitment to providing a high-quality, low carbon, sustainable development governed by leading design codes and standards for energy use, low carbon housing, and biodiversity.
- The ability to provide, on a single site, a significant element of the likely additional housing requirement for Southern Test Valley up to 2035. It is anticipated the site could accommodate up to about 1000 houses.
- A site which could be developed simultaneously in multiple locations by a variety of developers which would enhance the rate of delivery.
- The ability to ensure delivery of affordable housing at the rate required by the local plan, together with assisted living accommodation from a dedicated provider.
- A scale of development which would justify the provision of additional services and facilities as an integral part of the scheme, and generate the funds required to create and manage these in the long-term.
- The opportunity to retain the separation of Romsey and North Baddesley and secure it for the long term, through the creation of a legal agreement preventing any further development east of Highwood Lane.
- The ability to provide corridors of open space through the site and directly into the countryside open space at Warren Farm. This land will additionally become easily accessible for existing residents to the west of Halterworth Lane and south of Botley Road and be close to North Baddesley.
- The provision of open space areas adjacent to all the existing developed area on Halterworth Lane, Highwood Lane and Botley Road. This will not only provide separation from the development for existing residents but also the ability to fully landscape the development from existing viewpoints.
- The opportunity to provide for a significant level of additional zero carbon, solar power generation on the southern part of Warren Farm. It has been confirmed that in excess of 5,000 houses in the area could be served by this added dedicated facility.
- The opportunity to holistically approach the issue of zero carbon energy through the provision of additional solar power, an energy storage system, and the use of a dedicated micro-grid that will supply the new and existing housing and local commercial developments, therefore assisting SSEN's grid constraints and helping move the local area towards net zero. This integrated approach to energy supply, taking into account energy demand and energy storage on land controlled by one of the landowning parties to this submission, will create a leading opportunity that will serve as a lighthouse project for other local authorities.

- The opportunity to remove the unsightly high-capacity electricity cables and pylons running across the site by putting them underground, with route planning and costings already obtained from SSEN.
- The opportunity to address problems of parking in the area around Halterworth Primary School by providing dedicated school parking as well as drop-off and pick up facilities within the site, and separate access to the school from within the development.
- The opportunity to provide a dedicated new bus route serving the development, three schools, Abbey Park Industrial Estate, and the immediate environs – all linked to/via Romsey town centre.

The site offers a number of advantages that few locations, if any, can match in southern Test Valley:

- A flat level site, with no physical constraints to development, and not at risk from flooding. The site is covered by a minerals safeguarding policy, but the current assessment suggests that any extractable material is likely to be variable across the site, and given the high-water table will make large-scale extraction difficult. Further, any large-scale extraction could have local impact on flooding, hydrology, hydrogeology and biodiversity. A strategy of design and development that leaves the majority of material in-situ and re-used in the development process, would be more acceptable/beneficial and sustainable.
- Direct access to the south of the site from a redesigned Luzborough roundabout. A further vehicle access to the north and a bus only access onto Halterworth Lane.
- The site is well-located in relation to the local highway network with the opportunity to provide multiple vehicle and pedestrian/cycle access points to the development and streamline traffic flow around the site on the principal roads. This comprehensive approach will also be designed to eliminate 'rat runs' and take traffic onto higher quality roads.
- An opportunity to upgrade the level crossing to the north on Halterworth Lane.
- The site has been previously assessed by consultants commissioned by the Council as having a low-medium landscape sensitivity to development.
- It is immediately adjacent to the existing urban area of Romsey with easy access to the town centre, bus services and the railway station.
- There are a range of facilities which are within walking distance of the site including a primary school (Halterworth PS) and secondary school (Mountbatten) - both of these schools have capacity for expansion.
- Close proximity to Abbey Park Industrial Estate which is recognised as a strategic employment site in the adopted local plan and has the potential to be expanded.
- The overall site including Warren Farm will be able to provide all its open space requirements as well as its own Nitrate/phosphate mitigation and Biodiversity Net Gain.

It is recognised that the land between Halterworth Lane and Highwood Lane is located within the defined local gap separating Romsey and North Baddesley. However, the proposed residential development would not extend further east than the boundary of the Town represented by the extension of Whitenap up to the Luzborough PH. In that context the width of the local gap would remain unchanged. What impact there would be when viewed along Highwood Lane, should set against the benefit of securing the long-term future of the land to the east in the form of a significant area of Green Infrastructure at Warren Farm. This land could also be retained within a revised local gap designation – this is considered feasible by the Council's own landscape consultants (see Local Gap study in LP evidence library) who consider the local gap should be redrawn along Highwood Lane.

Development at Halterworth would be a better option for development than the Council's preferred option at Velmore Farm. It is a far more sustainable site and has less constraints on development. It will provide direct benefits to residents of Romsey through the creation of a valuable area of public open space at Warren Farm and will create affordable homes where people want to live.

The site is an obvious area for future housing development and has been shown by the Council's own assessments to be a suitable and sustainable option. If it is not chosen in this local plan, it will inevitably come forward at some point in future plan reviews as there are few suitable alternatives available. In the meantime, parts of the site will remain vulnerable to development pressure through the appeal process. This will be especially the case if the site at Whitenap continues to be delayed coming forward. This could mean the site would be developed on a piecemeal basis without the benefits of a comprehensive master plan to guide this and without the Warren Farm open space option being included.

Summary

The site is in a sustainable location with schools, employment, services, and facilities within easy reach. It is controlled by a number of developers, all of whom are keen to develop, and there are multiple options for access and phasing.

The proposal represents a significant strategic investment for the eastern side of Romsey, that will significantly enhance the open space, recreational and ecological facilities of the town. Along with Warren Farm, Emer Bog and Baddesley Common to the east, Fishlake Meadows Nature Reserve to the north, the Broadlands estate to the west, and the Luzborough Plantation to the south, the town will be uniquely surrounded by protected landscapes, much of which can be made accessible to the public via a network of footpaths and cycleways. This will be achieved at the same time as providing certainty over the early delivery of housing.

PRA

March 2024