

Planning Policy and Economic Development,  
Test Valley Borough Council,  
Beech Hurst,  
Weyhill Road,  
ANDOVER,  
SP10 3AJ

1<sup>st</sup> April 2024

Dear Sir,

**Test Valley Borough Revised Local Plan 2040 Regulation 18 Stage  
2 Public Consultation – February 2024.**

**Submissions into the Policies and Proposals of this Document as  
they affect Site Ref: 255 Land south of Hoe Lane, North Baddesley.**

These submissions are made on behalf of the owner of the land identified as Site Ref 255 in the 'Housing Site Appraisals' in the Strategic Housing and Economic Land Availability Assessment (SHELAA) Main Report Final Version of January 2024. This site has consistently been promoted for development over earlier public consultation stages in the current Adopted Local Plan and also this Revised Local Plan since at least 2010.

As far as the policies and proposals in this current consultation document, as they affect this site, it is noted that there have been no material changes to the policies and proposals contained in the previous 'Issues and Options' 2018 consultation document; the Refined Issues and Options Consultation 2020; and the Regulation 18 Stage 1 Consultation 2022. The submissions made in respect of this site over previous consultation stages are reiterated here to this current public consultation save for the changes set out below which reflect comments made about the site and which are challenged here.

## **A     The Site Specific suitability of the site for Housing Development.**

The fundamentals of the site's suitability for development have not changed over time. The site's appropriateness for housing development remain as set out in detail in previous public consultation responses. What has changed is that your Council's SHELAA Site Analysis of this site is now attributing negative characteristics to this land that are not evidenced by any facts. The land was tipped by Hampshire County Council some 40 years, and with inert material. It is not capable of being used productively for agricultural use because of the poor nature of the land after tipping, and has been used for the low level use of horse grazing because no other agricultural use is suitable. The SHELAA Appendix 4 Housing Site Appraisal for this site states (Pages 523 refers) that:

*'Part of the site does comprise 'best or most versatile' agricultural land as defined by the NPPF.'*

This is the first time in the preparation of either the current Adopted Local Plan and this Review Local Plan that this statement has been made in respect of this site. To our knowledge there has been no agricultural land quality assessment made of the land, and this statement is challenged as being incorrect. If the land was of that high quality then the present owner would have made more productive use of the land. Also, the land is too small to form a viable agricultural unit on its own, or with the more open agricultural land to the south and east of it. It is precisely because the site is not capable of being agriculturally productive that it makes sense to use it for a use such as housing. It may be that this attribution has been made as a result of using the old MAFF Agricultural Land Classification Maps. If so then the 'best and most versatile' designation may well be appropriate to the more open land to the east and south. But those maps are simply too small in scale to identify this relatively small site as a part of that higher designation. The tipping of the land by the County Council some 40 years ago terminated any prospect of that higher designation being reasonably applied to this site

None of the other comments made about the site in the SHELAA Appraisal are so negative that they can be considered to overwhelmingly constrain the site to appropriate housing development. On the contrary, this site is clearly one of, if not the, most appropriate sites for housing development on the edge of North Baddesley, in site specific terms.

## **B The Planning Policy appropriateness of the site for Housing Development.**

The site is in the Southern Policy Area of Test Valley Borough for planning purposes. Paragraph 4.133 of the Consultation Document makes clear that the objective is to:

*'...Focus sustainable growth at Romsey and other larger settlements help maintain their roles, and to support the existing strong and diverse economy.'*

Proposed Policy 6 (SS6) 'Meet the Housing Requirement' proposes five housing allocations in the Southern Housing Market Area:

- 1 Land south of Ganger Farm, Romsey for 340 units
- 2 Land south of the Bypass, Romsey for 110 units
- 3 Land at Velmore Farm, Valley Park for 1070 units
- 4 Land at King Edwards Park, Chandlers Ford for 44 Use Class C2 Extra Care units
- 5 Land at Upton Lane for 80 units

Effectively the allocation at King Edwards Park is not for Market Housing so should not be included in the allocations for the Southern Housing Market Area, leaving just four allocations.

Proposed Spatial Strategy Policy 1 (SS1) 'Settlement Hierarchy' proposes that strategic allocations should be directed to settlements in Tiers 1 and 2 of the Proposed Settlement Hierarchy. In the Southern Housing Market Area these are defined as:

Tier 1	Romsey
Tier 2	Chilworth; North Baddesley; Nursling and Rownhams; Valley Park; and Wellow.

It might be expected that, because of their location within these higher order settlements each of these settlements would be subject to at least some modest new housing allocation level, if only to meet the requirement of Para 4.133 mentioned above. However, three of the five Tier 2 settlements i.e. Chilworth, North Baddesley and Wellow receive no additional housing allocations whatsoever. This distribution of new housing thus fails to meet one of the key objectives of the Emerging Plan, and is not considered to be sound in terms of the good planning of the area.

Para 61 of the National Planning Policy Framework requires that the local housing needs assessment is the minimum number of homes needed:

*'...In addition to the local housing needs 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.'*

This is in the context of the NPPF overarching policy statement that (Para 61) local planning policy should:

*'To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed..'*

Given this clear statement it is surprising that no new housing allocations whatsoever are proposed in three of the six Tier 1 and 2 settlements, which are the only settlements identified as being of sufficient size and sustainability to merit taking new development. In terms of this site North Baddesley is a highly sustainable settlement that should at the very least be taking a modest level of new housing to support its existing services and facilities. This proposed site can deliver in the order of 50 dwellings, including a provision of affordable housing, on the southern edge of the existing settlement and in a location that is well contained visually, where the new housing would have no material intervisibility between it and the surrounding urban and countryside areas; and on a site which is of little use for agriculture because of its tipped status. It is also significant that the emerging local plan document does not include the site as being within the North Baddesley - Chliworth Gap. There are no material identified constraints to its development identified in the SHELAA Site Appraisal of January 2024 which summarises:

*'The site is available and promoted for development by the owner, but to date has had no interest from developers.'*

*The site is located outside of the settlement boundary of the TVBC Revised Local Plan DPD. The site is adjacent to the village of North Baddesley which is identified as a Key Service Centre in the Local Plan Settlement Hierarchy.*

*Key Service Centres have access to identified services and facilities including shops, bus routes, primary schools, employment and public houses.'*

This Appraisal also notes that there is a specific ecological issue relating to the site. The Hbic Local Ecological Network Map of the site shows its south-west corner comprising some Core Non-Statutory Areas (as opposed to Core Statutory Areas), a group of habitat patches that species can move easily between maintaining ecological function and conserving

biodiversity. This is not a constraint to development, but rather a factor that must be fully addressed in the preparation of detailed plans for the development of the site, in line with a full Ecological Appraisal of the site to inform such plans.

## **C Conclusions**

There are no material constraints to the site's development for housing. The site is well-located on the southern edge of a Tier 2 settlement to which new housing allocations should be directed, but to which no new housing is proposed whatsoever, contrary to the good planning of the area and the Review Local Plan's own policy objectives for the area. In the light of these arguments this site Ref 255 should be formally identified as a housing site with capacity for circa 50 dwellings in the Review Local Plan.

I would be grateful if you would take these submissions into account in the ongoing Review of your Local Plan. If any additional information or clarification is required please do not hesitate to contact the writer.

Yours faithfully,

**John W Cornwell FRTPI**  
**Chartered Town Planner**