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Chapman Lily Planning Ltd



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Date: 2nd April 2024

Our reference: GM-3361

Dear Sir or Madam,

RESPONSE TO THE TEST VALLEY DRAFT LOCAL PLAN 2040 REGULATION 18 STAGE 2 CONSULTATION

On behalf of Towerview Property Group, I herein provide a response to the Test Valley Draft Local Plan 2040 Regulation 18 Stage 2 consultation. It should be read in conjunction with the separate Strategic Housing and Economic Land Availability Assessment (SHELAA) submission which promotes land north of Botley Road, Romsey for a residential allocation.

Towerview Property Group is a reputable housebuilder based in the south of England with extensive land interests in Bournemouth, Poole and the surrounding areas. This response relates to their land interest situated to the north of Botley Road, Romsey. The site will already be known to Test Valley Borough Council (TVBC) having been previously submitted for inclusion in the SHELAA through TVBC's Call for Sites under reference 282 in 2021.

Towerview Property Group acknowledges that the emerging plan is at the Regulation 18 stage and that the next iteration will be shaped further as the plan progresses. However, the plan will ultimately need to meet the tests of soundness, as set out in paragraph 35 of the NPPF:

"a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; 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;

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b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework”.

Given the above requirement, this representation is framed in terms of highlighting areas where the plan may not prove sound and suggests how current deficiencies might be rectified. This response follows the format of the main consultation document and is structured as follows:

- Local Plan (Timetable)
- Vision and Objectives
- Duty to Cooperate
- Spatial Strategy and Settlement Hierarchy
- Housing Supply and Housing Requirement
- Local Gaps
- Transport and Movement
- Sustainable Design and Construction
- Climate Change and Biodiversity
- Green Infrastructure
- Heritage Assets
- Flood Risk and Drainage

Local Plan (Timetable)

Towerview Property Group support the plan period 2020-2040 which allows for a minimum 15-year time horizon following the adoption of the plan. Towerview Property Group, however, note how an indicative timeline for the production of the local plan is set out at figure 1.2 of the consultation document that shows an anticipated examination in Autumn 2025, followed by adoption in Spring 2026. Towerview Property Group would respectfully suggest this is overly ambitious, as it does not account for any consultation period on proposed modifications, nor the inevitable lead-in time for Council approval of the consultation material. Furthermore, nor does it account for the cooling-off period after the Council has decided (if) to adopt it. We are aware of several stalled examinations in the south of England with a much longer timeframe, including

Purbeck (submitted for examination in January 2019), Eastleigh (submitted in October 2018) and Havant (submitted in February 2021).

Towerview Property Group suggest that a contingency plan is implemented to ensure development will take place and, crucially, maintains a sufficient housing land supply to demonstrate a five-year housing land supply upon adoption of the plan. To this end, we would recommend TVBC consider an interim policy for the early release of land ahead of the conclusion on the local plan. This is a strategy that was successfully deployed in Havant Borough, for example, where the Council's 2016 Spatial Position Statement identified additional greenfield sites for development to boost supply. Further to the recent withdrawal of the Havant Local Plan from its examination, it is evident that Havant is reinstating this approach.

Vision and Objectives

The consultation document summarises well the wide range of issues facing the Borough over the plan period 2020-2040. Towerview Property Group are broadly supportive towards the local plan's overall proposed vision and objectives in principle as set out in Section 2 of the plan, although would like to highlight the difficulties in bringing forward town centre regeneration sites.

Town centre sites are often more encumbered with heritage constraints while viability concerns are a well-known burden when developing brownfield land in urban areas that often require high standards of design, whilst the high-density nature of such developments means that they do not typically deliver suitable family homes. Town centre regeneration therefore needs to be part of a blended strategy that includes greenfield allocations to help deliver affordable and family housing.

Duty to Cooperate

Paragraph 24 of the NPPF reminds councils that they are under a statutory duty to cooperate with each other *"on strategic matters that cross administrative boundaries"*, while paragraph 16(c) states that plans should *"be shaped by early, proportionate and effective engagement"*. Paragraph 26 of the NPPF also confirms that:

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

The publication of a Duty to Cooperate Topic Paper is welcomed and the presence of the PfSH Spatial Position Statement (SPS) to 2026 is encouraging. Clear efforts have been made to engage with external organisations and stakeholders, including statutory consultees, and with neighbouring authorities to accommodate any unmet needs that will be a key feature of a positively prepared, and therefore sound plan.

Spatial Strategy and Settlement Hierarchy

Towerview Property Group supports the detailed approach to assessing several spatial options and welcomes the proposed spatial strategy with Romsey and Andover forming the core of the strategy continuing to be the focus for development as well as a wider distribution of development to a larger number of settlements.

Towerview Property Group would, however, like to add that locations such as those surrounding the most sustainable locations in the Borough would play a significant role in delivering sustainable development. Romsey and Andover are the focus for development in both the current and emerging Local Plan, that recognises their inherent sustainability credentials in their respective Housing Marea Areas (HMA). As set out in this consultation response, land north of Botley Road directly adjoins Romsey and is within easy walking distance of two local schools, alongside has good access to local services and amenities and connectivity to an established cycle lane infrastructure, therefore can be considered as possessing a sustainable location for housing.

Towerview Property Group support the reassessment of the settlement hierarchy and agree that Romsey and Andover should be categorised as the most sustainable settlements in the Borough, supporting the needs of the wider population in Test Valley and potentially beyond the Borough reflecting the high level of services available.

Towerview Property Group are generally supportive towards allowing development to come forward outside of defined settlement boundaries as identified in Neighbourhood Plans or for community led development. Notwithstanding we consider it would be more appropriate to introduce an additional criterion to draft Policy SS2 that allows the release of additional and suitable land adjoining land of Tier 1-3 settlements in the event that the housing trajectory is not met.

Housing Supply and Housing Requirement

As set out in draft policy SS4 the housing requirement for the Borough is a minimum of 11,000 homes, to be delivered over the plan period of 2020 to 2040 with an annual requirement of 550 homes. Towerview Property Group agree with 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. We also agree with the approach adopted resulting in a minor uplift from 541 homes at the Regulation 18 Stage to 550 homes to account for demographic changes and based on the latest information available.

There are a number of important reasons why TVBC should be ambitious and plan for a higher number of homes. Firstly, it is vitally important for TVBC to *“support the Governments’ objective of significantly boosting the supply of homes”* as enshrined in paragraph 60 of the NPPF. Towerview Property Group are concerned that the timetable set out for the plan’s production would delay the Council’s ability to do so as set out. Secondly, it is contended that TVBC should be accommodating some of the unmet need of the wider sub region, particularly the South Hampshire region which has an established unmet need overall approaching 12,000 homes¹.

Moreover, it is common knowledge that housing affordability in the south-east region is worsening and this includes within Test Valley where the latest house price to earnings data shows for the district as a whole on average are at 10.3 times average earnings – and increasing, from a ratio of 4.9 back in 1997. This indicates that affordability is clearly worse in Test Valley in comparison to England as a whole that has an affordability ratio of 8.2². When considering at a linear forecast we can see that the projections suggest an increasing affordability gap in future years. These matters will need to be fully considered and accommodated where practical in order for the plan to be sound pursuant to paragraph 35 of the NPPF.

Furthermore, neighbouring Southampton City Council are predicted to have a shortfall of homes against their forecast requirement (as set by the Standard Method). Test Valley, whilst being situated only partially in the sub-region, still has an opportunity to help meet some of this need within their considerably less constrained boundaries. Test Valley is considerably less constrained than its neighbouring authorities and contains a number of settlements such as Romsey, which are highly sustainable and could help meet the unmet needs of Southampton and the wider South

¹ Draft Local Plan 2021-2040 (Regulation 18) - Housing Background Paper (2024)

²

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2022>

Hampshire Region. TVBC has significant potential to contribute towards the supply necessary to overcome the yet unmet needs within their boundaries.

We agree with contingency approach employed making provision of a minimum of 10% above the identified housing requirement although believe a more ambitious level of contingency would be pragmatic with the premise to deliver a greater excess of the number of dwellings required. This would ensure the Council maintain a 5-year housing land supply over the duration of the plan period as well as the need to deliver affordable housing and the need to ensure the best use is made of previously developed land.

Local Gaps

Towerview Property Group recognise that given their different geographies there are resultant differing development pressures in the north and south of the Borough, whilst acknowledge specifically in relation to the northern Test Valley area there is a particular pressure to retain Local Gap designations around settlements which play an important role in helping to define their character and in shaping the settlement pattern of the area. This is likely to influence the future distribution of development in the south of the borough.

Towerview Property Group also recognise Local Gaps play an important role in preventing the coalescence of settlements in the Borough and concur they should be rightly protected. Draft Policy ENV4 'Local Gaps' continues to identify 'Romsey - North Adderbury' as one of number of Local Gaps within the south of the Borough, this is shown on the map below.



Figure 1: Local Gap: Romsey – North Baddesley

As set out in the Council's 'Local Gaps Assessment' (provided as part of the evidence to the Draft Test Valley Local Plan), Local Gaps are longstanding designations and have an essential strategic planning function concerned with maintaining the separation, individual identity and settings of individual settlements. Paragraph 5.185 of the Draft Local Plan confirms these Local Gap designations *"help guide the direction of growth and identify areas of countryside which are strategically important in defining settlement edges and settings, and in maintaining separation between them"*. It is acknowledged that Local gaps have enabled settlements to retain their separate identity and local distinctiveness and have thus prevented the characteristics associated with urban sprawl from occurring.

Whilst not all development is necessarily prevented within Local Gap designations, it is noted in the Council's 'Local Gaps Assessment' that developments across the Borough within Local Gaps have received planning permission. It is submitted that the current preparation of the emerging Local Plan provides an opportunity to review whether or not the existing Gaps are still necessary and perform the function for which they were originally designated. To this end and having regard to the 'Romsey - North Adderbury' Local Gap specifically, we note that the 'Local Gaps Assessment' provides an assessment. The commitment to undertake a review of the Local Gap is reinforced by paragraph 32 of the NPPF which states *"The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and*

proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals".

It is noted that the 'Local Gaps Assessment', highlights that it contributes in part to the sense of separation between Romsey and North Baddesley whilst recommends there is scope to amend the Local Gap adjacent to the existing settlement edge where the rural character has been eroded. It is also noted in the 'Local Gaps Assessment' that amending this part of the Local Gap would not undermine the strategic intent or purpose underpinning it, as Highwood Lane helps reinforce the perceptual qualities of the gap and we note that this could include my client's land on the eastern edge of Romsey.

Towerview Property Group is not supportive and finds it difficult to be see any reasoned justification for the site's inclusion in the Local Gap within the emerging Local Plan solely on an historical basis. It does not meet the stated purposes of a Local Gap as its qualities are not significant enough to create the sense of two separate settlements physically or visually merging, nor would it individually or cumulatively with other existing or proposed development compromise the integrity of the gap. The removal of this section of the Local Gap in this location will have negligible impact.

It should also be noted that land adjacent to Abbey Park Industrial Estate is a proposed strategic employment allocation (under Policy 9) in the emerging Local Plan that would remove the land from the 'Romsey - North Adderbury' Local Gap which is in very close proximity to the site. The allocation undeniably would shift the spatial distribution of Romsey eastwards and when considered in the context of the Abbey Park Industrial Estate allocation my client's proposals present the opportunity to provide an interconnection between the allocation's proposed employment use for future occupiers. Although my client's land is not reliant upon the delivery of the allocation, it should be acknowledged that once the allocation begins to deliver, it will complement and strengthen the existing sustainability of the settlement and would offer further employment opportunities in the town once delivered. There is also already development further east off Botley Road which already visually signifies a transition out into open countryside. The site also lies immediately adjacent to the recent Luzborough Green residential development where the principle of development has already been recognised by the Council.

As noted above, whilst a Local Gap designation does not necessarily preclude development, the removal of the site from the Local Gap will allow my client's land to come forward, which represents a logical and sustainable location for development being immediately adjoining existing residential development, on the eastern edge of Romsey to help meet the housing needs of the Borough during the plan period, including the delivery of much needed affordable housing

provision. The site is within easy walking distance of two local schools and can be considered as being in a sustainable location having good access to local services and connectivity to the established cycle lane infrastructure.

The land is visually and physically well contained with natural dense and mature vegetation with no publicly available views into the site from the east beyond Highwood Lane and the perception of the Local Gap from within Romsey is limited by Highwood Lane, residential properties, the roundabout on the A27, the Industrial Estate and Luzborough Development which together mark the edge of the town.

The proposals centre on a landscape led approach with the proposals including significant areas of high quality open green space in the east and north of the site providing for biodiversity net gain. Mature hedgerows on the periphery of the site will be retained and reinforced wherever possible to form the basis for green corridors. The accompanying Vision Document shows the proposal in more detail, which incorporates a Concept Masterplan and Green Infrastructure Plan. My client's land is therefore an ideal location for new development for the reasons set out above and development of the site represents a natural extension to Romsey that would not diminish the physical and visual separation of the Local Gap, nor would it individually or cumulatively with other existing or proposed development compromise the integrity of the Local Gap.

We suggest that draft Policy ENV4 should be amended to delete this area of the Local Gap designation. Having regard to the tests of 'soundness' set out at paragraph 35 of the NPPF we believe that the deletion of this area will ensure that the Plan is positively prepared in terms of being based on the best strategy to meet objectively assessed development and infrastructure requirements and justified (in terms of representing the most appropriate strategy when considered against reasonable alternatives).

Transport and Movement

Towerview Property Group supports the strategy to encourage active and sustainable modes of transport and reduce the impact of travel by private car, including ensuring *"new development facilitates improvements to accessibility, safety and connectivity in our transport infrastructure"*. This can be achieved through allocating land on the edges of settlements, which can then support the facilities and services of those settlements.

Land north of Botley Road would be one such example, which, as set out in this consultation response, would be close to several employment opportunities and a range of services and amenities. In addition, Towerview Property Group would highlight that settlement extensions are

typically able to provide bespoke solutions and onsite cycle/footpaths that provide improved connections with existing networks.

Sustainable Building and Energy Use

Towerview Property Group are supportive and adopt a fabric first approach to construction of their homes which is considered to be more sustainable than relying on renewable energy solutions which are often more expensive, have a higher embodied energy use and may not necessarily be used efficiently by future occupiers. Towerview Property Group are committed towards the transition away from gas boilers and the fabric standard outlined in the Future Homes Standard consultation.

Climate Change and Biodiversity

Towerview Property Group are supportive of measures to reduce carbon emissions and improve biodiversity within the Borough. Land north of Botley Road is one such example. Reinforcement and management of the northern and eastern boundaries would help screen and soften views of the development, improve biodiversity and help reinforce the edge of the Local Gap.

Towerview Property Group are committed towards reduce carbon emissions in their development proposals and the site put forward provides a range of opportunities to deliver additional green infrastructure on site which provides opportunities for biodiversity enhancement.

Towerview Property Group notes the requirement of draft Policy BIO3 for providing 10% Biodiversity Net Gain (BNG), linked to the Environment Bill. A more nuanced approach which focuses biodiversity net gains on areas where they can provide the best ecological benefit would appear more sensible. The requirements of BNG need to make sure they are thoroughly tested in viability terms, including taking account of the latest DEFRA BNG metric, which is fundamental concern that can see the capacity of allocations reduce.

Green Infrastructure

Towerview Property Group support the draft policy BIO4 aims, demonstrated by the incorporation of significant new green infrastructure within the proposals for the site, including high quality public open space. Mature hedgerows on the periphery of the site will be retained and reinforced wherever possible to form the basis for green corridors. It is though considered

important that the policy does not unduly hinder other policy aims, such as the implementation of key infrastructure, and this should be recognised clearly within the policy.

Heritage Assets

Towerview Property group are supportive towards draft policy ENV1. There are no heritage assets onsite. The site adjoins Luzborough Cottage which is a Grade II listed building. The design of the development will be sensitive to this designation and development will not impact upon it. Luzborough House is Grade II* and lies to the south of the site, on the opposite side of Botley Road. In terms of the setting of the Luzborough public house, given the development which has taken place to the north-west of this listed building it is not considered development of the proposed site should have a significant additional impact on the Luzborough's setting. The proposals would result in a significant number of public benefits, which include the provision of around 170 dwellings as well as much needed affordable homes together with green space, landscaping, ecological enhancements and associated works, to outweigh any modest level of harm perceived.

Flood Risk and Drainage

Towerview Property Group supports the strategy to direct development to areas at lowest risk of flooding, noting that this rules out multiple locations across the plan area. This reaffirms the need to release land at lower risk of flooding to deliver new homes. Surface water drainage within the proposed development would be handled through soakaways, SUDs and permeable surfacing to meet Environment Agency standards for runoff rates.

Land North of Botley Road, Romsey

As set out above, Towerview Property Group believe land north of Botley Road, Romsey would present a highly credible and deliverable site for residential development. The developable area of the site measures c.9.05ha and it is capable of establishing suitable vehicular access points capable of serving new development.



Figure 2: Concept Masterplan Excerpt

The site lies entirely within Flood Zone 1 in terms of rivers and seas. The risk of surface water flooding is negligible, with only small sections identified as being at medium risk on the EA surface water map. However, Towerview Property Group is cognisant that the development of the site could have potential to exacerbate the risk of flooding elsewhere unless attenuation and SuDs form an integral part of any scheme.

As can be seen from the concept plan excerpt in figure 2 above, there is an opportunity to deliver additional green infrastructure on site which provides opportunities for biodiversity enhancements, access to open space and opportunities for recreation with associated health and well-being benefits.

The site provides an opportunity to delivery much needed housing, including affordable housing, on a sustainably located site which adjoins and lies intermediately adjacent to the settlement of Romsey (where existing electricity, water, gas and sewerage infrastructure is present). Romsey sits at the top of the settlement hierarchy, and it should therefore form the focus for significant development to promote sustainable patterns of growth. Land north of Botley Road therefore offers a realistic option to deliver up to 170 new homes in one of the most sustainable settlements in the plan area. Included at Appendix 1 to this representation is a Vision Document which sets out an idea of how a development could look on this site.

The site is well related to existing residential properties and possesses excellent links by bike or on foot to a range of facilities and services make it a highly credible growth option. Development of the site would lead to a very significant public benefit in terms of opening up additional land for public access and expanding the local green infrastructure network and financial contributions towards new community infrastructure. The benefits of the proposed allocation are considered to be wide-ranging and significant, and inextricably linked to the objectives of the sustainable development as set out in the NPPF.

As set out above, all evidence points towards the site being deliverable and Towerview Property Group is committed to working positively with the Council to address any outstanding concerns.

The glossary of the NPPF says that for sites to be considered deliverable, they should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged. Towerview Property Group confirms that the site is both deliverable and developable and presents an opportunity for sustainable development as an allocation in the emerging plan.

CONCLUSIONS

Towerview Property Group have welcomed the opportunity to participate in the TVBC Draft Local Plan 2040 Regulation 18 (Stage 2) consultation. Towerview Property Group are committed to delivering much needed, high quality, homes on site along with the supporting infrastructure to create a diverse, sustainable new development on the eastern edge of Romsey.

There are many positive components of the Draft Plan which we fully support and endorse, however, Towerview Property Group believe that there are a number of areas of the plan that will need to be modified and that a more thorough and creative approach to identification of realistic alternative options is necessary if the plan is to eventually be found sound.

Specifically, the only real constraint to the development of this site is the location within the currently defined Local Gap. We believe the draft proposals for the site would not cause harm to the Local Gap objectives by avoiding the physical and or visual coalescence between Romsey and North Baddesley. We would recommend the inclusion of an interim policy for the early release of land ahead of the conclusion of the local plan and consider that it is possible that the housing target will need to increase further to discussions under the Duty to Cooperate.

The site is available and under single ownership meaning delivery could commence in the next 5 years. Therefore, this site could make a significant and swift contribution towards meeting the housing needs for the Borough.

As acknowledged in the consultation material, greenfield releases are much more likely to be viable enough to support the delivery of affordable housing, family housing and infrastructure. By contrast, a strategy focussing primarily on higher density urban sites would be unlikely to deliver a range of housing types in line with the NPPF.

Through this representation, Towerview Property Group has put forward a credible argument in favour of releasing land north of the Botley Road from the Local Gap and allocating on the edge of Romsey. The site is well contained, and its development would further enhance the settlement's sustainability.

I trust these comments will be taken into account warrant the site's removal for the Local Gap designation and consideration will be given to the inclusion of land to the north of Botley Road as an allocation in the Local Plan. My client and I would welcome the opportunity to discuss this with the Planning Policy and Economic Development team.

If you have any questions in any regard or require any further information in relation to the contents of this consultation response, please do not hesitate to contact me on

[REDACTED]

Yours sincerely,

[REDACTED]

Richard Mitchell BSc (Hons) MPlan Cert MSc

Associate Director

Appendix 1



Land at Botley Road, Romsey

VISION DOCUMENT | October 2019

An aerial photograph showing a residential area with many houses and trees. In the foreground, there is a large green field and a road. A blue semi-transparent box is overlaid on the left side of the image, containing text.

'A Vision'

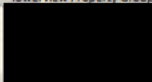
Romsey is identified as a Major Centre in the Adopted Revised Local Plan 2011-2019. It is an attractive and accessible market town that is identified as a location for sustainable growth due to the availability and proximity to services and facilities. This Statement sets out the background to why the Land off Botley Road is a suitable location, and is immediately available, to help achieve the Brough's additional housing needs to 2036. The vision is to deliver a New Neighbourhood that is integrated with the adjoining residential areas that combines choice with quality and economic opportunity with enhancement to the natural environment

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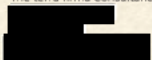


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This Statement has been prepared by Luken Beck, with support from the specialist team shown, on behalf of our client Seaward Properties. All plans and drawings within this document are based on Ordnance Survey (c) Copyright. All rights reserved 100016272.

1.0 Introduction

1.1 Purpose of this Statement

This Statement has been prepared in response to the Test Valley Borough Council 'Call for Sites' public consultation exercise which will inform the preparation of the Strategic Housing and Economic Land Availability Assessment 2019 (SHELAA). It is also intended to seek the views of the Parish Council and community and should be regarded as a 'living document'. It will continue to be refined and informed by ongoing discussions with the local community and further technical work by the team of specialist consultants appointed by Towerview Property Group.

1.2 Site Location

The site is immediately adjacent to the recent Luzborough Green residential development and surrounding residential areas on the eastern edge of Romsey. It is located approximately 350m from Mountbatten Secondary School and 500m from Halterworth Primary School via the most direct walking routes. The site measures approximately 9ha, and is accessed directly from Botley Road and potentially with an emergency and/or pedestrian access onto Highwood Lane.



Site Location plan

Aerial photograph showing the site in the context of the existing urban area



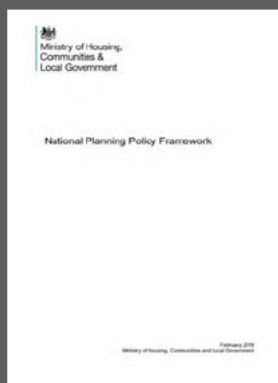
1.3 Site Description

The site is relatively flat and comprises mainly of agricultural grazing land, with a Hampshire County Council operated depot for the storage of gravel in the south-east corner, which is well enclosed by tall mature hedgerow. The boundaries of the site also comprise of mature hedgerows and trees with open countryside to the north and east.

The southern boundary of the site abuts Botley Road and residential areas on the eastern edge of Romsey. The western boundary at the site frontage abuts a residential curtilage and there are further properties fronting Elmtree Gardens and Botley Road to the west. The eastern boundary comprises of a mature hedgerow and some residential curtilages in the north east corner, both of which provide a defined edge between the site and open countryside forming part of the Romsey / North Baddesley Gap.

The site is sustainably located, being situated on a public transport corridor between Romsey Town Centre (and railway station), North Baddesley, Chilworth and Southampton. It is within easy walking and cycling distance of key services and facilities. The site is not located within a statutory landscape designation or an area designated as of flood risk, historic significance or of international, national or local ecological importance. Whilst the site is located on the edge of the Romsey / North Baddesley Local Gap it is not considered to provide a strong contribution to the separation between the two settlements.

2.0 Planning policy context



2.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) was first published in March 2012. It was recently substantially updated in July 2018 and has been revised again to a lesser extent in its current form which was published by the government in February 2019. As the central national policy document for planning it, provides guidance for local planning authorities (LPAs) in formulating Local Plans and supporting documents, and sets out the Government's policies in key topic areas and for the determination of planning applications. The NPPF maintains a 'presumption in favour of sustainable development' (at paragraph 11) which new plans should apply. For plan making this means generally;

- Positively seeking opportunities to meet the development needs of local areas, while being sufficiently flexible to adapt to rapid change.
- As a minimum, providing housing and other uses that meet objectively assessed needs (and those of neighbouring areas which cannot be met there).

For decision making this 'presumption' means approving development without delay where it conforms with an up-to-date development plan or, where those policies are out of date, granting permission unless policies protecting key sensitive designation and assets are overriding, or adverse effects are so significant they demonstrably outweigh the benefits.

With specific regard to housing delivery, the requirement for the Local Plans to meet the full, objectively assessed needs for market and affordable housing in the housing market area is restated at paragraph 60 of the Framework. The NPPF requires Local Planning Authorities (LPAs) to identify sufficient land for homes, with a supply of specific deliverable sites for years 1-5 and developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 (paragraph 67). The Framework notes that small and medium sites can make an important contribution as they are often built out relatively quickly.

The NPPF advises that deliverable sites should be available now, offer a suitable location for development and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable.

2.2 National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) provides guidance for LPAs on the factors that should be considered when assessing the suitability of sites and broad locations for development. In addition to re-appraising the suitability of previously allocated land the following factors are advised to form part of the assessment of site suitability for development now and in the future:

- Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination.
- Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation.
- Appropriateness and likely market attractiveness for the type of development proposed.
- Contribution to regeneration priority areas.
- Environmental/amenity impacts experienced by would be occupiers and neighbouring areas.

The NPPF 2019 has reinforced emphasis on protecting nationally designated landscapes and limiting development within them. This places further pressure on Test Valley Borough Council via the 'Duty to Co-operate' as the New Forest National Park does not need to meet in full the assessed housing needs;

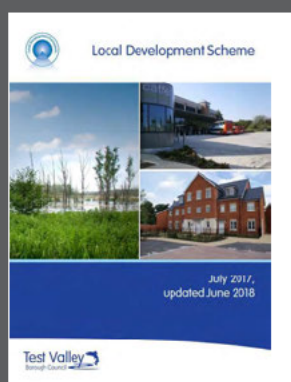
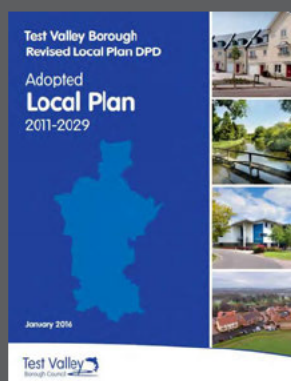
"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks.. which have the highest status of protection in relation to these issues . The conservation and enhancement of wildlife and cultural heritage are also important... and should be given great weight in National Parks... The scale and extent of development within these designated areas should be limited. "

(paragraph 172)

The NPPF and NPPG are significant material considerations in terms of the principle of development on this site, with particular regard to the following:

The presumption in favour of sustainable development. Romsey is identified as a 'Major Centre' in the settlement hierarchy, as set out by the 'Revised Local Plan DPD' 2011-2029, which are required to take the highest level of growth.

- The presumption in favour of sustainable development.
- The site is not designated in the local plan for nature conservation, landscape character, flood risk, contamination or historic significance.
- The extent of nature conservation designations, and floodplains which affect large areas surrounding Romsey but do not constrain the delivery of a new neighbourhood on this site.
- The site is considered to provide a 'suitable' location for a modest scale of residential development.
- The site is available now and can deliver homes that, while not immediately necessary in District wide housing supply terms could provide a significant boost to housing delivery, and particularly the supply of much needed affordable housing in the area.
- Development of the site is credible and viable, being able to meet site specific infrastructure requirements.



2.3 Adopted Local Plan

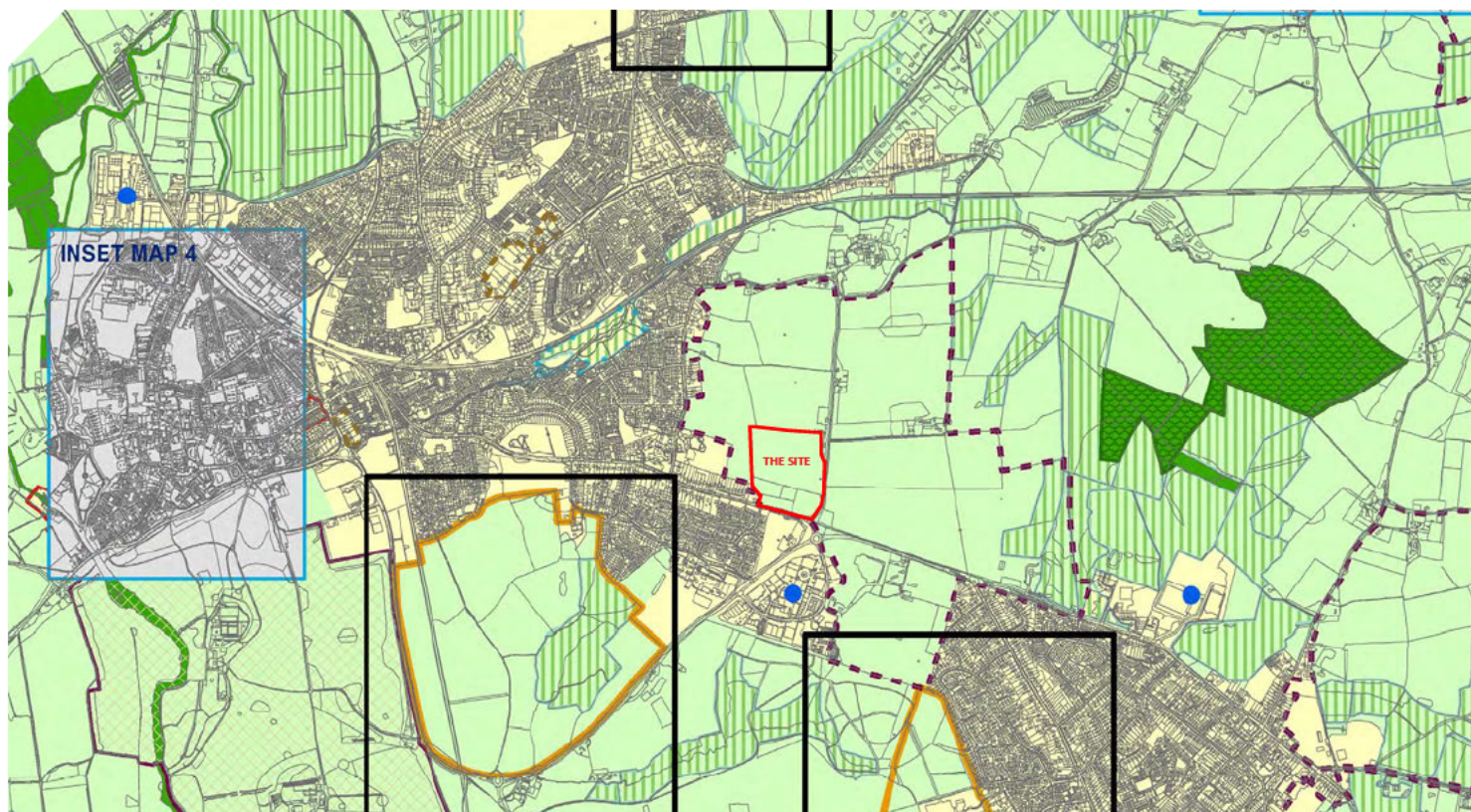
The Council's Adopted Development Plan comprises principally of the policies in;

- Revised Local Plan DPD, 2011-2029 (Adopted January 2016); and
- Hampshire Mineral and Waste Local Plan.

Covering the whole of the District the Plan sets out a housing requirement for a minimum of 10,584 new dwellings to be built over the Plan period (Policy SD1). The Plan establishes Andover and Romsey as the Major Centres within the District (COM2) which are the highest level in the settlement hierarchy and are identified for the highest level of growth. This approach to housing distribution is currently under review through the emerging Local Plan 2036. The Southern Housing Market Area in which Romsey sits and is the main settlement has a minimum requirement of 3,492 dwellings (194 dpa).

Key policies include COM2 which directs development 'within' existing settlements and restrains housing development in the 'countryside' to exceptions set out in policies COM8-COM13. Types include rural exceptions affordable housing, 'community led' development, replacement and occupation worker dwellings.

Towards delivery of the requirement the Revised Local Plan allocated land for a new neighbourhood at Abbotswood (known as) comprising 1,300 dwellings.



- | | | |
|-----------------------------------|---|---|
| Borough Boundary | Residential Area of Special Character (Policy E4) | Internationally Important Wildlife Site (Policy E5) |
| Inset Map Boundary | Countryside (Policy COM2) | Sites of Special Scientific Interest (Policy E5) |
| Settlement Boundary (Policy COM2) | Local Gap (Policy E3) | Sites of Importance for Nature Conservation (Policy E5) |

2.4 Emerging Local Plan

The Council is preparing its next Local Plan, which will extend to cover the period to 2036. It is now a requirement for LPA's to review plans at least every 5 years under the NPPF. The latest published LDS sets out the Council's timetable for the production and adoption of its next Local Plan.

Plan preparation is at an early stage but working towards adoption by the Spring in 2022.

2.5 Issues and Options

In July 2018 the Council undertook its Issues and Options Consultation for the next Local Plan. The consultation document identified that;

"The majority of the population is concentrated in the Borough's urban centres, with 65% of Test Valley's residents living in Andover and Romsey."

"If we don't plan to meet the housing needs arising... residents' needs won't be met, resulting in a situation where demand continues to outweigh supply. This will push up house prices making it more difficult for people to enter the housing market... [and] greater risk that housing developments could be built in inappropriate locations."



The consultation presented a range of options for distributing development including one or more of the following in a mixed approach;

- A New Village
- Local Plan Allocations
- Proportionate Distribution to Parishes
- Community Led
- Mixed Approach



Issues and Options Key Diagram



2.6 Romsey Future Initiative

"Romsey Future sets out a long term vision for Romsey. It is an active partnership of many groups and organisations working together to build consensus and deliver on shared ambitions. We work together to deliver projects, to attract funding, and to guide future policies and strategies."

Romsey Future sets out a long term vision for the town and intends to put in place to guide changes in Romsey over a 20 year period. This was published in "A Vision for Romsey 2015-2035" which sets out that;

"Over the next 20 years, Romsey will become the place of choice for the residents of small towns and villages in Southern Test Valley to come together. Romsey will thrive and grow, new communities will emerge and more people will visit the town centre. The town will retain its character as a relatively compact historic market town closely related to the countryside around it."

The document recognises that Romsey is;

"A growing town with new development and infrastructure... With new homes will come new facilities and infrastructure. This will provide real opportunities for the town, but a clear plan must be in place which will help Romsey deal with this growth in a way that responds to the emerging needs of the town."

The Vision document sets out 5 key 'Ambitions' that cover topics which will shape this plan. These need to be considered holistically but in terms of Ambition "4, Living Well in Romsey" means as the town grows there should be;

"A good mix of homes in terms of type, size and cost that addresses the aspirations of all parts of Romsey's population... [and] a need to continue to invest in the community of Romsey so that social action is nurtured and community spirit is further developed."

3.0 Development rationale

3.1 Landscape Character

The site is bounded by Botley Road to the south with a strong native hedgerow and mature trees.

The character of the immediate context to the south is residential within a well vegetated environment of mature trees and planting, set back from the road. The roads and footpath infrastructure are in good condition with bus stops nearby, a controlled crossing with lights and connections to the A27 roundabout immediately to the west and to the centre of town to the east. A recent development at Luzborough Green has recently been completed to the southeast side of Botley Road on the opposite side.

A previous application on the site by Foreman Homes suggested a roundabout on Botley Road opposite Montfort Road to access the site. This would seem a good location. While this would inevitably incur the loss of some of the site's boundary trees and vegetation, this would be minimised so as to preserve as much as possible of the green nature of the roadside at the settlement edge, adopting the precedent of set-back development in the immediate area.



Views along Botley Road illustrating suburban character and bus routes (Looking west)



Views along Botley Road illustrating suburban character and bus routes (Looking east)

As one heads west along Botley Road the site edge disappears back behind the existing HCC depot which is well screened by hedge and trees all the way around the corner with Highwood Lane running north off Botley Road up the eastern side of the site. Views into site are possible through gaps in the boundary hedgerow.

Highwood Lane offers the opportunity for secondary/emergency access through the current field access which is via a small unsurfaced layby and gate. This is a busy road connection between Winchester and Botley Road during peak periods.

On entering the site, there is an immediate feel of openness brought about by the flat topography. This is blighted by pylons and overhead power lines to the north eastern edge. This area is a constraint on development requiring easement distances and ideally accomodating a signifant area of open space.



Access to the HCC depot on Highwood Lane



View looking north along Highwood Lane from the site boundary

Although the field is bordered by hedgerow and trees on all sides, filtered views are available of the roads and residential areas beyond, even the solar farm. The HCC depot is however well screened by the substantial boundary vegetation, as is the Primary School that lies behind a further vegetated boundary and an element of banking. Although the fields adjacent give a rural feel, the lack of much in the way of long views out and continual awareness of development beyond, both in terms of sight and sound, makes for a site that feels it is at settlement edge and lacks tranquillity.



View towards the eastern boundary and the HCC depot



View to the south from within the site

The northern boundary includes remnant hedgerow and trees along the stock-proof fence but is largely open, allowing clear views in from adjacent properties at the north eastern corner and from the public footpath to the north. Walking off-site across the intervening fields the feel of the land does become more pleasant and tranquil and the footpath itself appears to be a much used route.



Views back south to site from the Public Footpath to the north working east to west

The western edge of site is in many ways the most interesting. It includes some of the best trees (many of them mature oaks) but little in the way of understorey, having been heavily grazed beneath. This is an edge that would benefit from a little soils restoration around the roots and consideration of new underplanting but the character of walking beneath these canopies and seeing through to the distance is a positive attribute to the site.



Western Boundary

Summary

In summary, the landscape value of the site is considered to be moderate in the context of the landscape character and visual receptors. It is considered that residential development in general across the site would comprise a logical extension, which is consistent with the settlement pattern about Butts Green. The setting of a new development could be managed along the western boundary through the introduction of a tree belt and consideration of the profile of built form.

3.2 Contribution Towards Settlement Gap

In considering the wider picture for a strategic site allocation in this location, the TVBC Landscape Character Assessment, specifically LCA 3A in which the site falls, is key evidence to be relied upon. Our landscape assessment of the site for the large part accords with the characteristics of the area, but with the inevitable influences of being located at settlement edge.

The site is not critical to providing the Local Gap between Romsey and North Baddesley. There are no publicly available views into the site from the east beyond Highwood Lane and the perception of the Gap from within Romsey is limited by Highwood Lane residential properties, the roundabout on the A27, the Industrial Estate and Luzborough Development which together mark the edge of the town. The approach to Botley Road from the roundabout can still screen any development within the site (until actually alongside it) if the HCC compound screening vegetation were to be carefully retained.

3.3 Biodiversity

The site comprises semi improved grassland in agricultural use and an area of hardstanding in the south-eastern corner used for storing gravel. The site is enclosed by mature hedgerows and trees with further agricultural land to the north, east and west. The site was subject to an extended Phase I habitat survey in 2014 which recorded the main habitats and their ecological value.

There are no statutory sites of nature conservation importance affecting the site, or sites designated specifically in respect to bats within 4km of the site.

The following sites were recorded as within 2km of the site:

- Tadburn Meadows Local Nature Reserve (LNR) around 590m north-west of the site;
- Baddesley Common and Emer Bog Site of Special Scientific Interest (SSSI) around 1.1km east of the site; and
- Emer Bog Special Area of Conservation (SAC) around 1.1km east of the site (although TVBC state 2.15km away via the nearest walking route and 2km by car to the nearest car park).

Given the distance of the site from the EU Designations it is unlikely that the allocation would cause a significant impact. The inclusion of a substantial area of public open space and potential community orchard could further minimise impacts through reducing recreational impacts / dog walking on the Emer Bog SAC.

There are no Sites of Importance for Nature Conservation (SINC) within or adjacent to the site, with the closest SINC being Gypsy's Copse SINC, which is located around 500m north-west of the site and identified for its significant element of ancient semi-natural woodland.

Proposals for Avoidance, Mitigation and Enhancement

The proposed strategic allocation would result in an unavoidable loss of semi-improved grassland and hardstanding, although these are unlikely to be of any ecological significance to habitats or species. The allocation would retain the majority of habitats on the field margins, which are of greatest ecological value and of most interest to fauna, namely the hedgerows and treelines. Opportunities for enhancement of the retained hedgerows would be explored through additional planting, removal of gravel and planting of a new hedgerow and trees along the sites northern boundary. Existing points of access into the site could be retained to minimise hedgerow removal.

The proposed retention and reinforcement of hedgerows will enhance opportunities for foraging and commuting bats and minimise impacts on invertebrates and reptiles. A sensitive lighting scheme could also be delivered to ensure that bat habitat remains suitable.



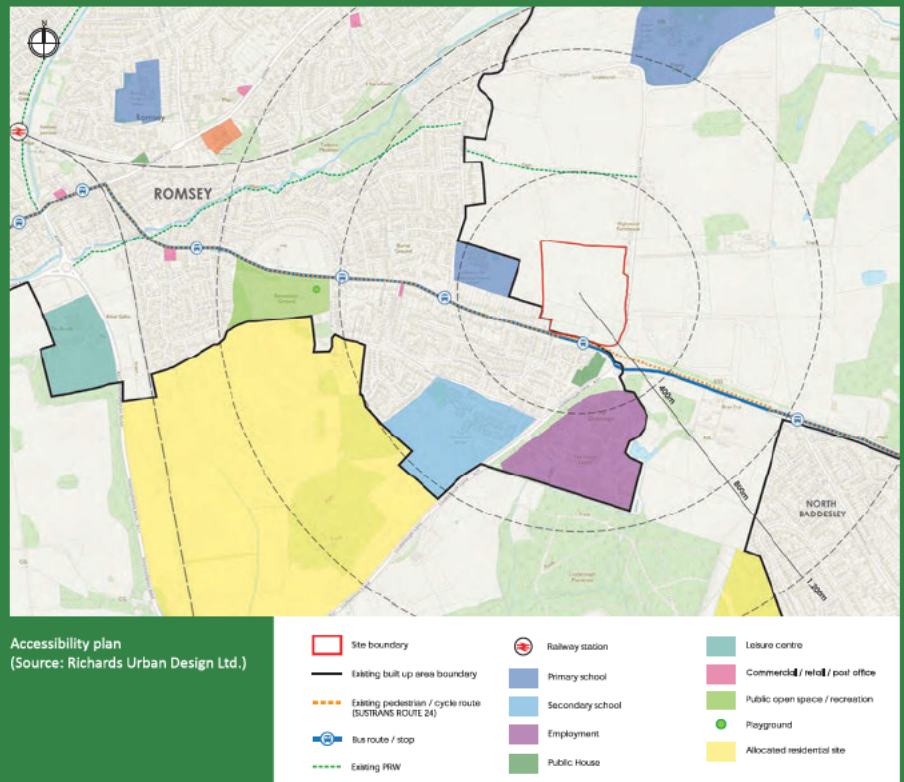
3.4 Transport and Access

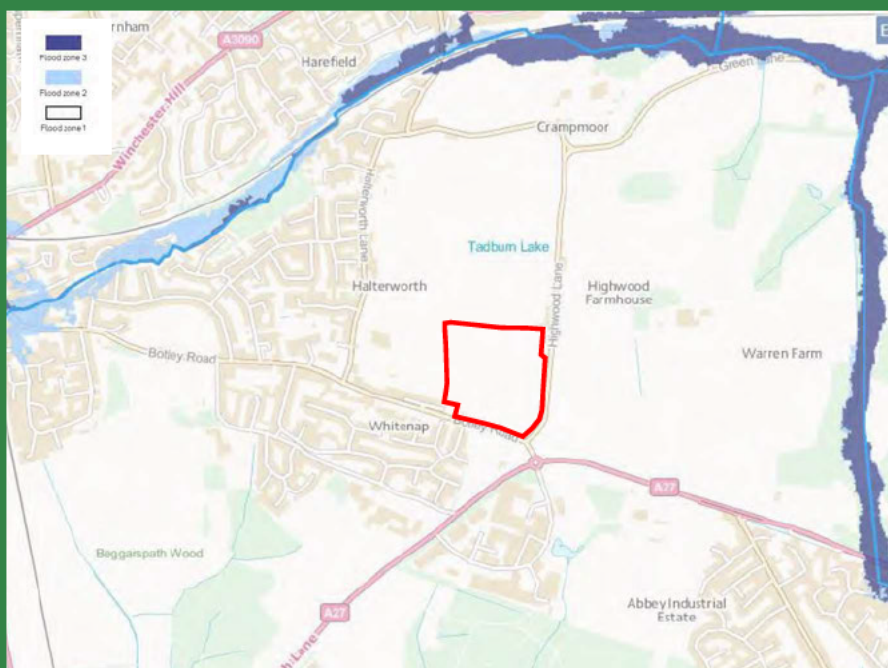
The site is accessible to vehicles and pedestrians directly off Botley Road. The site access is likely to be provided through a mini roundabout junction which would serve both as a speed calming measure and facilitate safer crossing by school children traveling to Mountbatten School from the site.

The allocation would not include an additional vehicular access onto Highwood Lane, although emergency access and potentially a redesign of the depot site access could form part of a development proposal, subject to sensitivity towards its rural character. Highwood Lane is an unlit lane with derestricted speed limit that is used as a rat run between Botley Road and Winchester Road. There is an opportunity to implement pedestrian footway / safety measures and traffic calming.

With regard to accessibility to key services and facilities the location of the site immediately adjacent the built-up area will encourage the use of walking and cycling. The site is accessible to the following:

- Bus stops are located adjacent and very close to the site along Botley Road. There are regular bus services to Romsey railway station and town centre and major shopping, leisure and employment designations in Southampton and Eastleigh.
- Mountbatten Secondary School, the Luzborough public house and business park are all within comfortable walking distance.
- There is a general store, post office and Halterworth Primary School within 600m of the site.
- Within 2km of the site are located Romsey Town Centre, doctors surgeries and railway station.





Extract from EA Flood risk map showing the site (Source: Environment Agency)

3.5 Flood Risk and Drainage

The NPPF aims to reduce flood risk through a sequential approach to development opportunities. The NPPF and accompanying Technical Guidance aims to ensure flood risks and the predicted effects of climate change have been taken into account and appropriate measures put in place to ensure that development is safe, where possible the flood risk overall is reduced and increased flood risk does not occur elsewhere.

Under the Flood and Water Management Act 2010 Hampshire County Council is the Lead Local Flood Authority and is responsible for coordinating the management of local flood risk. As Lead Local Flood Authority for Hampshire, the County Council is in the process of preparing Surface Water Management Plans.

The site is located within Flood Zone 1 and is not at risk of flooding from rivers, sea or groundwater. Surface water drainage within the proposed development would be handled through soakaways, SUDs and permeable surfacing to meet Environment Agency standards for run-off rates.

3.6 Built Heritage and Archaeology

There are no identified heritage assets located within the site. The effects of the development of the site on built heritage will therefore be indirect in nature.

The National Heritage List for England confirms that there are a limited number of designated heritage assets within the vicinity of the site, whose significance could be affected by development in their setting. These are identified as;

- Luzborough Cottage, 172 Botley Road (Grade II) which dates back to the 17th century; and
- The Luzborough Public House (Grade II*), which dates back to the mid-16th century, is located approximately 100m to the south with Grade II listed garden walls.

The particular significance of these designated heritage assets has been considered in light of their proximity and siting relative to the site.

With regard to archaeology, there are no archaeological or historic assets recorded within the Site on the Hampshire Archaeology and Historic Buildings Record (AHBR), although there are several entries recorded from the surrounding area. Whilst there is potential for the site to contain archaeological remains this is not viewed as a constraint to development based on the desk-top assessment undertaken in 2014 in support of the planning application.

A geophysical survey of the field and potentially trial trenching at the planning application stage would ensure that any archaeological remains affected by the proposed development are suitably excavated, recorded and the results published in a suitable format.

4.0 Development concept

4.1 Masterplanning Principles

The following principles have been identified to guide the concept masterplan, based on our initial technical work and understanding of the site opportunities and constraints. These have not yet been consulted on with the community.

Layout

Perimeter blocks would create a legible and pedestrian permeable residential layout that recognises desire lines to Mountbatten Secondary School and other existing key services and facilities nearby. In particular direct links with bus routes are to be explored, and a pedestrian and cycle network would take advantage of the site's flat topography.

Landscape Character

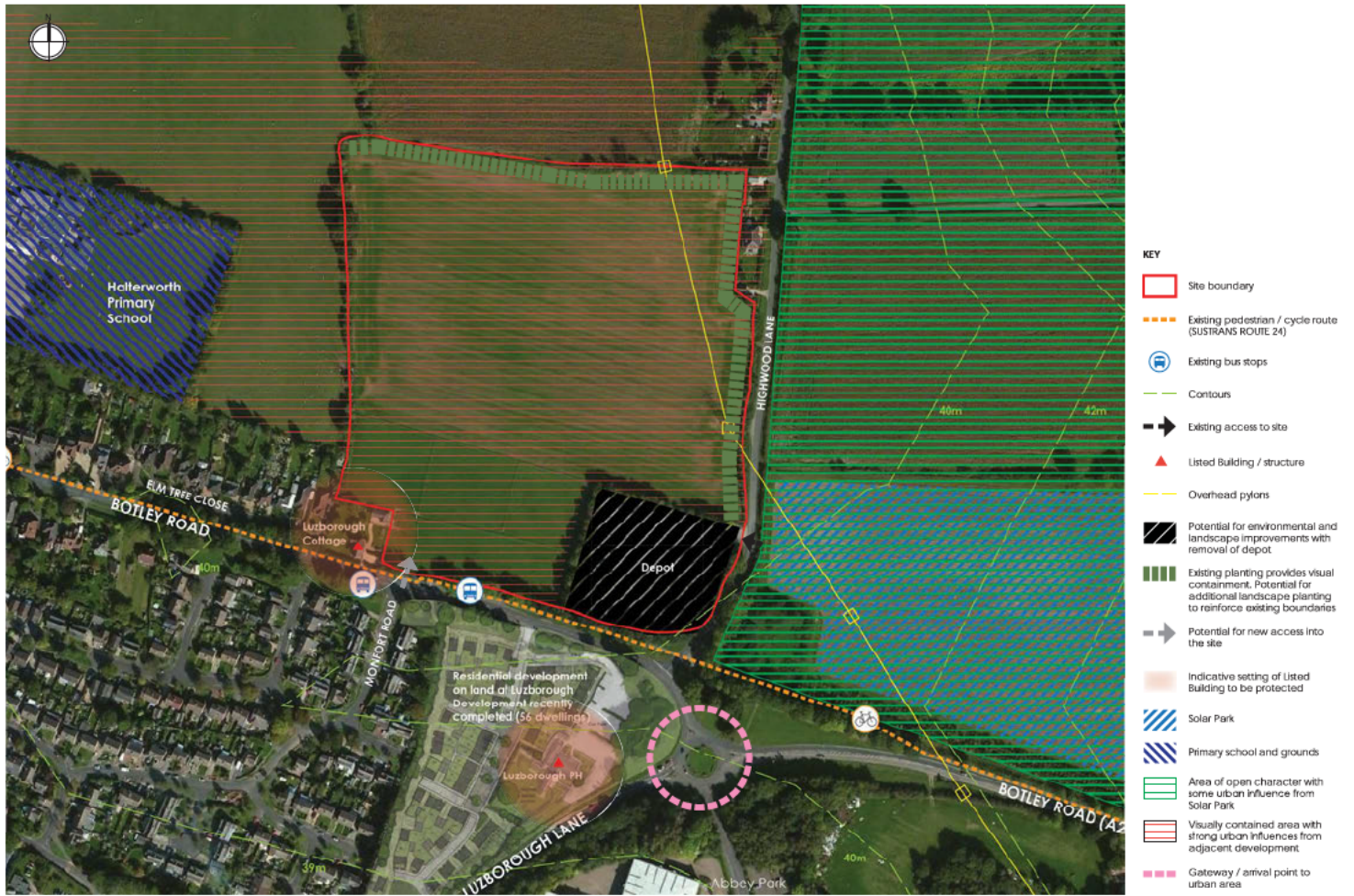
The strategic allocation would not lead to a continued expansion beyond its eastern boundary in the future. There is a need to create a clearly defined boundary for the new neighbourhood that becomes readily recognisable and a permanent edge to the Local Gap. Views from the east and adjoining residential areas are limited although would be recognised through sensitive landscaping and the location of an extensive area of public green space in the east and north of the site.

Green Infrastructure

Mature hedgerows on the periphery of the site will be retained and reinforced wherever possible to form the basis for green corridors. Biodiversity protection and enhancement will be sought through the provision of an alternative dog walking area and circular route around the edge of the development to provide an alternative to EU Designated sites in the wider area. A green ring around the site, including community orchard, would have a multi-functional role of a local amenity, landscape buffer, biodiversity enhancement area and surface water attenuation.

Transport and Movement

The generally flat nature of the site offers an advantage for walking, cycling, wheel chair users and those with prams. All new homes would be within 5 minutes' walk of a frequent bus service and areas of open green space and a children's play area.



Opportunities and Constraints Plan (Source: Richards Urban Design Ltd.)

4.2 Concept masterplan

The development of a new neighbourhood on the eastern edge of Romsey would be the logical next step in the organic growth of the town, subject to a sensitive layout and landscaping strategy to protect and reinforce the permanence of the Local Gap to the east of Highwood Lane.

The new neighbourhood would provide an opportunity to significantly boost the supply of market and affordable housing, whilst delivering a substantial area of public open space to improve the sustainability of adjoining neighbourhoods.

This concept masterplan addresses the opportunities and constraints and applies the principles of good urban design to create a distinctive new neighbourhood that includes a diverse variety of new house types and tenures. A carefully considered mixed residential development would make an important contribution to the Borough's housing requirement and support the viability of existing services and local facilities. There are a number of key elements to the concept masterplan which are set out below.

Self Sustaining and Integrated

The new neighbourhood would be designed to encourage walking, cycling and the use of public transport. The existing bus stops and footpaths located on Botley Road would be integrated into the network of pedestrian routes designed into the residential layout. In doing so proposed area of open space and the new community orchard and play space would be accessible to the wider area.

Housing Choice and Quality in Design

Well designed and attractive streets could comprise a range of tenures, types and sizes of accommodation respectful to the characteristics of the rural edges of the site. It is envisaged densities would reduce close to the northern and eastern edge of the site and that building materials and architectural styles would be based on the local vernacular whilst delivering variety to create a locally distinctive and interesting streetscapes.



Concept masterplan (Source: Richards Urban Design Ltd.)



5.0 Deliverability

5.1 Site Suitability

Paragraph 59 of the NPPF states that to boost significantly the supply of housing, local authorities should identify a supply of housing, local authorities should identify a supply of specific deliverable sites sufficient to provide 5 years' worth of housing. The glossary states that,

'to be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years.'

This Vision Statement has demonstrated the site meets the above criteria and the 'Methodology – Stage 2: Site Broad Location Assessment' set out in the PPG, which is summarised as follows.

'Physical limitations or problems such as access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination'

- A review of the Environment Agency Flood Data Map has identified the site is entirely within Flood Zone 1.
- The site is not located within an Air Quality Management Area (AQMA) and a comprehensive well planned residential development on the site is not considered likely to lead to an unacceptable impact in terms of producing noise, pollutants, hazardous, toxic or noxious substances to air.

'Potential impacts including the effect upon landscapes including landscape features, nature and heritage conservation'

The natural topography of the site is flat. It is not within an area designated as international, national or local ecological importance, or does it fall within or effect any other 'sensitive area' as defined in Schedule 2 of the Environmental Impact Assessment Regulations 2018.

Areas of ecological value within the site are limited to the existing hedgerows and mature trees along the field boundary which provide value as ecological habitats and create connectivity to the wider landscape. A well planned development could minimise impacts on hedgerows though generous stand-off distances and a 'green buffer along the eastern edge of the site to help create a defined edge to the Gap and provide biodiversity gain and nitrate balancing. The site is not close to a Conservation Area or Scheduled Monuments.

'Appropriateness and likely market attractiveness for the type of development proposed'

The site is located within comfortable walking distance of a range of key facilities and services in the local area, in particular secondary and primary schools and bus services.

'Contribution to regeneration priority areas'

Whilst the site is not located within a regeneration priority area it is located on the edge of Romsey, identified as a Major Centre. Additional housing on the edge of the town is likely to support local services and facilities within the existing community.

'Environmental / amenity impacts experienced by would be occupiers and neighbouring areas'

The environmental impacts and likely avoidance and mitigation measures relating to the proposed development are referred to above. There would be no significant amenity impacts on future occupiers. With regard to the impacts from the development on existing residents to the south and west of the site it is likely this would be restricted to the construction phase and could be suitably mitigated through appropriate measures identified and enforced through a conditional planning permission.

An aerial photograph showing a large, open green field in the foreground. In the background, there is a residential area with several houses and a parking lot. A power line with a tall pylon is visible in the lower right corner of the image.

6.2 Availability

The land is within the control of Towerview Property Group. There are no known legal or ownership issues that would constrain the site coming forwards for development in the immediate future.

5.3 Achievability

A comprehensive development for up to 170 dwellings is considered to be achievable within the next five years, subject to planning consent. The site is located adjacent to the edge of the built-up area with direct vehicular and pedestrian/ cycle access from Botley Road. There are no significant physical or potential environmental constraints on the site that would restrict the economic viability of a residential development of this scale.



Key Benefits of the site

- *Growth in this location would complement and support existing key services in Romsey, including bus services to Southampton.*
- *A modest size addition to the town comprising at least 170 dwellings of mixed sizes and affordability, allied with a substantial area of public open space and financial contributions towards new community infrastructure.*
- *New homes within a few minutes' walk of Mountbatten Secondary School, Halterworth Primary School and frequent bus services. New residents would also be within comfortable walking and cycling distance of local shops.*
- *Reinforcement and management of the northern and eastern boundaries would help screen and soften views of the development, improve biodiversity and help reinforce the edge of the Local Gap.*

This statement has been prepared by Luken Beck MDP Ltd. on behalf of our client Seaward Properties Ltd. All plans and drawings within this document are based on Ordnance Survey information, or are the property of the client except where indicated.

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