Planning Policy

From: Stuart Irvine <

Sent: 14 September 2018 13:47

To: Planning Policy

Subject: Local Plan Consultation - Representations on behalf of the Trustees of the Barker

Mill Estates

Attachments: TVBC LP representations - on behalf of the Trustees of the Barker Mill Estates.pdf

Good afternoon

Please find attached representations on the Local Plan consultation document on behalf of my client, the Trustees of the Barker Mill Estates.

My client welcomes the opportunity to contribute to this early stage of the plan making process and looks forward to future opportunities to participate in the more formal stages as the plan moves forward.

I would be grateful if you could acknowledge receipt in due course.

Many thanks

Stuart Irvine

Senior Director, Planning South East

Turley

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Representations in respect of the Test Valley Issues and Options Consultation for the Next Local Plan

Submitted on behalf of the Trustees of the

Barker Mill Estates September 2018 **Turley**

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Stuart Irvine

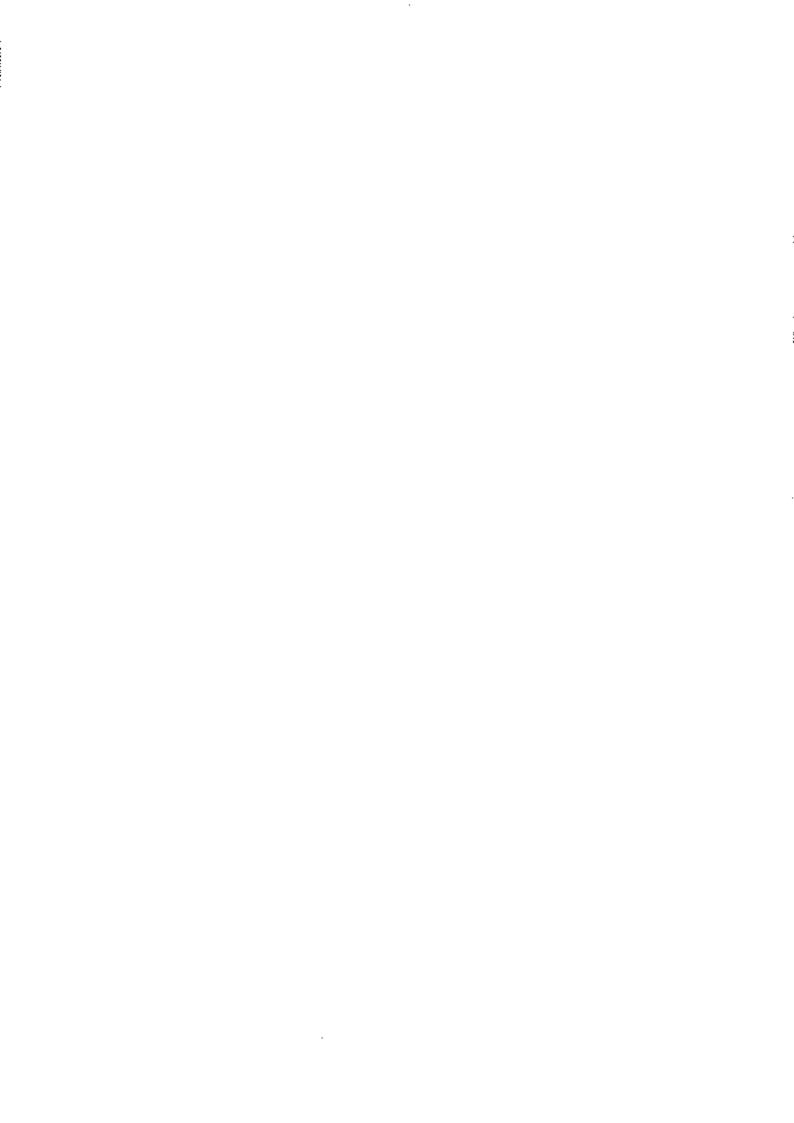
Client
The Trustees of the Barker Mull Estate
Our reference
TRUW3015

14 Sep 2018

1. Introduction

- 1.1 We are pleased to have this opportunity to comment on the Test Valley Issues and Options Consultation Document dated July 2018 (referred to hereafter as the 'Consultation Document'). Turley is acting on behalf of the Trustees of the Barker Mill Estates ('client') who are promoting three site opportunities at the Upton Triangle, Paulet Lacave Avenue and Nursling Street, Nursling for residential development.
- Our response below focusses on those matters/questions of relevance in the context of our client's interest in the Site, although we reserve the right to comment on additional matters at a later stage of local plan preparation, if this is required. These representations address the following questions posed in the Consultation Document:
 - 4: Determining Housing Needs
 - 5: Supporting Economic Growth
 - 6: Housing Market Area Boundaries
 - 7: Development Distribution
 - 8: Development Strategy
 - 12: Affordable Exception Sites
 - 16: Mix and Type of Housing
 - 20: Accessible/Adaptable/Wheelchair user dwellings
 - 26: Employment
 - 33: Local Gaps
 - 42: Open Space for Mitigation
 - 44: Sustainable Forms of Transport
- 1.3 With regard to the timescales for the preparation of the emerging Local Plan, it is noted that Submission of the plan will not be reached until after the 24th January 2019 deadline set within the revised National Planning Policy Framework 2018 (NPPF) transitional policy¹. Therefore, we have assumed that the Plan will be evaluated against the policies of the newly published version of the NPPF.
- 1.4 These representations are supported by comments in relation to the three specific development opportunities that the Client is promoting.

¹NPPF, paragraph 214.



2. Response to Local Plan Questions

- 2.1 The following section sets out our client's comments on the questions raised in the Consultation Document which are considered most relevant to our clients' interests.
 - Question 4: Should the Local Plan's housing requirement be consistent with Governments standard methodology? Do you have any evidence to support your view?
- 2.2 Subsequent to the publication of the Consultation Document, the Government published the Revised NPPF. In terms of housing identifying housing needs of an area, the NPPF advocated the application of a standardised methodology (SM).
- 2.3 The direction set out in the NPPF requires Local Planning Authorities (LPAs) to applying the SM unless 'exceptional circumstances' justify an alternative approach. The NPPF does not define what may or may not comprise exceptional circumstances, and the Consultation Document is silent on this issue. At this stage and without any evidence to the contrary, it is considered appropriate for the Council to use the SM producing the new Plan.
- 2.4 However, as set out in the NPPF and Planning Practice Guidance (PPG) housing need derived through the SM should be seen as a 'starting point' and used to determine only the 'the minimum number of homes needed' for an area (Turley emphasis).
- 2.5 In this context, our client welcomes the Council's acknowledgement of its statutory requirements under the Duty to Co-operate. Provisions within the updated NPPF have strengthened the operation of the Duty to Cooperate. Councils are now required to demonstrate, through a Statement of Common Ground (SOCG), that a Local Plan is effective (and therefore sound)² and that joint working on cross-boundary strategic matters (i.e. housing needs that cannot be met within neighbouring areas³) have been dealt with rather than deferred.
- 2.6 Whilst it is not possible at this stage to determined what uplift to Test Valley SM baseline may be appropriate, however, it is noted that Southampton is unlikely to be able to meet its housing needs and within the neighbouring areas of New Forest and Eastleigh planned housing delivery is falling short of need. At a subregional level, housing need across the Partnership for Urban South Hampshire (PUSH) area is also falling short.
- 2.7 It will be critical to ensure that preparation of the SOCG forms an early part of the plan making process to ensure that Test Valley quantifies any shortfall in housing need in the area, and that reasonable endeavours are made to ensure any necessary uplift to the Test Valley baseline SM figure is applied.

² NPPF, paragraph 35

a NPPF, paragraph 60

- 2.8 Engagement with the Council's neighbours should be undertaken early and SOCG progress reported regularly (not left to the end of the Plan making process) to ensure that communities and stakeholders are made aware of the real 'policy-on' housing requirements that will need to be met through the Plan, and ultimately reduce the possibility of intervention by a planning inspector at Local Plan examination stage.
- 2.9 It is also relevant to note that housing numbers should also be influenced by the economic context and the aspirations for employment growth both within Test Valley and in the wider sub region. This may require a housing figure that extends beyond the SM. Such additional growth should be welcomed as a means of supporting prosperity and driving the economy of the area. This requires a positive and ambitious approach and our response to Question 5 is relevant in that respect.
- 2.10 Finally, we note that the Government will be reviewing the SM following the publication of the 2018 household projections to ensure that housing number are boosted in order to meet the Government's national housing targets. Any changes in the SM approach will need to be addressed through the Plan in due course.

Question 5: Should the Local Plan increase its housing requirement to help support economic growth? If yes, do you have any evidence to support this?

- 2.11 Paragraph 6.2 of the Consultation Document, together with the Council's Economic Development Strategy 2016-2019 (February 2017) recognise the need to support businesses and economic growth in the Borough. One of the questions posed within the Consultation Document is whether more land should be allocated within the Plan.
- 2.12 The NPPF requires Local Plans to be positive and proactive in their approach to building a strong and competitive economy. Further employment allocations are likely to be needed if the Council is not to constrain economic growth; particularly in Southern Test Valley given the attractiveness of the area for business and its relationship with Southampton City and the wider South Hampshire urban area. In this context, it is thus essential that the Council has due regard to any uplift in housing requirements (on top of the SM baseline and any uplifts through the Duty to Cooperate) that are required to support its economic ambitions and those of the wider region.

Question 6:- Do you think the HMA boundary is broadly right? If not, how and why do you think it should be changed?

- 2.13 National Planning Policy is clear that authorities should establish a housing requirement figure <u>for their whole area</u>, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period⁴.
- 2.14 Whist it is acknowledged that the geography of the Borough has justified two housing market areas in past Plans, continuation of this approach presents issues in terms of how the Council intends to disaggregate the SM housing need figures, which are derived at the LPA level. The Consultation Document is silent on the Council proposed approach to achieve this, which has not allowed us to comment on whether the boundary is correct, or fundamentally, whether the approach should be retained in the new Plan.
- 2.15 It is our client's view that a simplified approach that no longer focusses on a North South split could better reflect the SM and general thrust of national policy to simplify plan making. The approach would also reduce the time taken to prepare the Plan as the evidence base relating to housing and employment needs would no longer need to consider disaggregation. Whilst this is the case, it is essential that the strategy takes account of key drivers within the housing market areas, particularly in terms of the role and importance of Southampton as a key centre. This would suggest a focus on delivery in the southern part of the Borough.
- 2.16 In terms of supply, removal of the disaggregation approach would also yield benefits in terms of greater flexibility of how the Council manages supply and reports on housing delivery both in terms of assessing five year housing land cupply and also ensuring housing completions are in line with expectations set out in the new Housing Delivery Test introduced through the NPPF.

Question 7: Are there any other approaches to distributing development across the Barough that we should consider?

- 2.17 The Consultation Document sets out a number of options for meeting housing needs. All options may have some merit, and in practice, a combination of approaches may be appropriate.
- 2.18 Notwithstanding the above, we would warn against proportional distribution to Parishes as this approach would not take into account development constraints and could result in unsustainable patterns of growth. It also has the potential to prolong the plan making process as housing requirements and sites would need to be agreed with each individual Parish.

⁴ Paragraph 65

- 2.19 The appropriate mechanism for a Parish (or other eligible community group) to engage in Plan making is voluntarily through the Neighbourhood Planning process; it should not be imposed upon an area through proportional distribution.
- 2.20 Such an approach also undermines the desire to meet housing needs that are driven by key geographic drivers, such as growth to support Southampton. This should heavily influence the distribution of development and it will be a key determinant of the genuine sustainability of future housing growth.
- 2.21 In determining the development strategy to be employed in the Plan, in line with long established spatial planning principles and national policy, development should be directed to locations which are (or can be made) sustainable taking into account relevant physical and policy constraints. This approach is broadly analogous to the Local Plan Allocation option set out in paragraph 5.24 of the Consultation Document which implies an evidenced based approach to identification of growth locations.
- 2.22 Our client therefore supports the Council's approach reference in the Consultation Document to focussing development to larger settlements⁵, which are often more sustainable. It will be important for the Council to reconsider and update its settlement hierarchy through the new Local Plan, as this evidence should be a key driver in the spatial distribution of development across the Borough.
- 2.23 In this context, setting aside the administrative boundaries, Nursling is functionally and physically part of Southampton City. Nursling is a highly sustainable location for growth being well located to a wide range of services, facilities and employment opportunities, and presents a genuine opportunity for development to be located where the need for travel is reduced. Journeys to schools, employment and shopping are within a reasonable walking and cycling distance, and there are a number of bus services to key centre routes passing through the area, particularly along Romsey Road. The proximity of the various land interests to major employment opportunities, both locally (at Adanac Park and the Nursling Industrial Estate) and within the wider Southampton urban area is also highly relevant as they are key trip generators and are well connected through sustainable modes of transit.
- 2.24 It is our client's view that the relationship between Nursling and Southampton needs greater recognition in the emerging plan, and there is a strong argument that Nursling should be categorised as a major centre as part of Southampton. For example, as set out in the adopted Local Plan, Stockbridge, Charlton and Chilworth are in the same settlement hierarchy category as Nursling. This, in our view, is a clear manifestation that the synergies between Nursling and Southampton are not fully appreciated.

⁵ Consultation Document, Paragraph 5.9

- 2.25 There is a concern that an insular approach to assessing settlements which focusses on Test Valley only and does not fully consider the employment / retail / education / leisure opportunities in Southampton could be taken forward in the new Plan thereby limiting Nurslings' latent potential for meeting the Borough's development needs. This is also relevant to the approach that the Council will take in the sustainability assessments, which must recognise the proximity to facilities in the Southampton administrative area if it is to be properly balanced.
- 2.26 It is noted in paragraph 5.26 of the Consultation Documents that the Council will make sure that contingency measures are in place to ensure that alternatives are planned for to meet its housing requirements should there be a delay to delivery. This is a sound approach and should help ensure that the Council is able to proactively address any potential shortfalls in delivery and guard against speculative planning applications. However, this should not be used as a means of avoiding the full OAN and should be a genuine contingency that can respond quickly to under supply.

Question 8 - Do you have any comments on the [development strategy] approaches suggested above?

2.27 See comments on Question 7 above.

Question 12: Should we allow market housing on rural affordable exception sites?

- 2.28 The definition of 'Rural Exception Sites' is set out in Annex 2 of the NPPF. This indicates that a proportion of market homes may be allowed on such sites at the local planning authority's discretion.
- 2.29 As indicated in the Consultation Document housing affordability is a key issue to be addressed in the Borough, and whilst the Council has met its affordable housing targets (circa 200 dwelling per annum (dpa)), the target is considerably below objective evidence of affordable housing need which, based on the most recent SHMA evidence, is 292 dpa over the current local plan period, or 370 dpa if the current backlog is met by 2018 (then reducing to 262 dpa).
- 2.30 As such, when applying the annualised affordable housing need figure in the SHMA, it is apparent that the Council has failed to meet its affordable housing needs in all but two years considered in the Consultation Document. Facilitating affordable housing should therefore be a key priority for the Local Plan, and the Council should not rule out the potential to expedite affordable housing delivery through the provision of on-site market housing. The emerging Local Plan provides an opportunity for the Council to develop local planning policy that builds on the exceptions policy set out in the adopted Plan, to ensure that such development comes forward on suitable sites and development is of an appropriate form.

2.31 Linked to the above, and as set out in Paragraph 71 of the NPPF, the Local Plan should also recognise and support entry-level exception sites that are suitable for first time buyers (or those looking to rent their first home) and which offer one or more one or more types of affordable housing as defined in Annex 2 of this Framework (i.e. affordable housing for rent, starter homes, discounted market sales housing and/or other affordable routes to home ownership).

Question 16: Should we include a policy that requires a mix and type of housing, or should the housing market inform what mix and type of housing to build?

- 2.32 It is important that the Council provides an indication of housing mix, both in terms of affordable housing and market housing provision. This provides prospective applicants with a broad understanding of the Council's expectations and evidence of need in order to reduce the potential for protracted discussions on layout and mix at the pre-application / application stage.
- 2.33 However, it is equally important that the Council is flexible in its approach in order to be responsive to market demands and changing need, viability, the requirements of registered providers, and to account for character area considerations; all of which create unique circumstances for individual development proposals.
- 2.34 It is therefore not considered appropriate to include a policy within the new Plan that rigidly applies a set housing mix; be it for affordable or market housing. It is our client's view that it would be more appropriate for the Council to set out it preferred housing mix through its evidence base and that the Local Plan (be it in policy or the supporting text) refers back to the relevant supporting evidence, with appropriate flexibility being afforded to the decision maker on future individual applications.

Question 20: Do you think we should establish standards for accessible, adaptable and wheelchair user dwellings

2.35 Building Regulations already stipulate such standards. However, were the Council to consider introducing a new policy in relation to accessible and adaptable dwellings (Building Regulations M4(2)), and/or wheelchair user dwellings (Building Regulations M4(3)), it is incumbent upon the Council to demonstrate that there is a need / justification for the enhanced requirements.

- 2.36 PPG⁶ requires Local Planning Authorities to gather evidence to determine whether there is a need for higher standards in their area, and justify setting appropriate policies in their Local Plans. The PPG set out a number of evidence requirements local planning should use to demonstrate need including:
 - the likely future need for housing for older and disabled people (including wheelchair user dwellings).
 - size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).
 - the accessibility and adaptability of existing housing stock.
 - how needs vary across different housing tenures.
 - the overall impact on viability
- 2.37 Without such evidence, the Council is not in a position to put forward a sound policy in the new Local Plan on this matter. Should such evidence be provided then we reserve our position to comment further in due course.

Question 26: Should we allocate more land to enable more choice and flexibility to the market?

- 2.38 The provision of employment floorspace is critical to supporting the local economy and it is essential that the plan includes sufficient opportunities to meet the broad needs of the market.
- In doing this, the plan should not restrict itself to a narrow definition of employment generating uses (as it has in the past) with an over reliance on B1, B2 and B8 definitions. The plan should be more flexible and support allocations that can accommodate job generating uses and allow them to prosper.
- 2.40 This approach should be taken in respect of existing employment allocations too, such as Bargain Farm, Nursling, where the restrictive nature of the uses (B1 and B2 only) has acted as a barrier to inverstment. In this respect, the plan should support all reasonable forms of use that generate employment and attract investment into the local area.

⁶ Paragraph: 001 Reference lD: 56-001-20150327

Question 33: Should we continue to retain the principle of Local Gaps? Should we define specific boundaries or a more general policy which aims to avoid coalescence?

- 2.41 National Planning Policy does not provide explicit support for the 'gap' policies. It is debatable whether continuation of this policy approach to avoiding coalescence is appropriate in the context of national policy where general countryside policies could perform the same role.
- 2.42 However, were the Council to continue with gap policy designations, to give clarity to stakeholders, it is important that the need for gaps is clearly evidenced and their specific boundaries are clearly defined on the Policies Map. Further, the Council should allow for some flexibility for appropriate development in gap locations, a criteria based policy, akin to that in the adopted plan, may be therefore appropriate.
- 2.43 For clarity, it is our view that a gap can only be justified where there is a genuine risk of coalescence taking place and that no more land than is necessary is included within the designation. On this basis, it is suggested that there is no likely justification for the inclusion of new gap areas or the significant extension of existing gap policy areas.

Question 42: Should alternative open space for mitigation be provided as part of new developments or should land be specifically allocated, or a combination?

- 2.44 A combination of both approaches is considered appropriate, but the Council should also allow for contributions to be provided where these would facilitate the provision of Suitable Alternative Natural Greenspace (SANG) at the subregional level as is currently the approach through the Solent Recreation Mitigation Strategy.
- 2.45 We would hope that the proactive approach being of some LPAs such as East Hampshire in searching for 'Strategic SANG' as part of their role in facilitating sustainable development could also be adopted by Test Valley.
- 2.46 It is also suggested that prospective residential sites should be prioritised for allocation where they are appropriately located and of sufficient scale to be capable of delivering SANG as part of a development.

Question 44: How can the Council promote more sustainable forms of transport such as walking, cycling and public transport

- 2.47 In order for the Council to facilitate modal shift from the private car, developments need to be in locations that offer genuine alternative travel options. As implied in our response to Question 7, if the Council is to facilitate a move to sustainable forms of transport, and influence travel choices, it should be seeking to locate development in settlements that are well related to key travel attractors and where good public transport services are available.
- 2.48 In addition, the Plan should take a flexible approach to the provision of other infrastructure, such as park & ride sites. Specifically, the existing allocation at Bargain Farm, Nursling for park & ride should be set out in a way that supports innovative approaches, including a multi-storey approach, or a use that combines with other development (such as the emerging proposals for a health campus at the site).

3. Land at the Upton Triangle, Nursling

The Site

- 3.1 The site is located to the east of Upton, which forms part of Nursling and sits to the north west of Southampton. The site is 4.5ha in size and as its name suggests, is triangular in shape.
- 3.2 The site benefits from a well-established boundary of trees and hedges. The boundary along Romsey Road is particularly well defined by a number of significant trees and hedgerows.
- 3.3 Romsey Road (A3057) bounds the site to the east and beyond this is Upton Crescent, an area of residential dwellings. Upton Crescent is located within the settlement boundary of Nursling and Rownhams. These properties are detached and of a reasonable size with front gardens and drive ways. Romsey Road provides direct access to Southampton and already features two bus stops adjacent to the site which currently operate a school service.





3.4 A public footpath runs along the southern boundary of the site connecting Upton to Romsey Road. To the south of the footpath is the M27 which is separated by a tree covered bank which slopes down to the motorway.

- 3.5 Lymer Villas road skirts the south western boundary and contains residential dwellings. These vary in character and include 2 storey brick built semi-detached houses which are believed to be of a 1970s style as well as older cottages of a more traditional design.
- 3.6 Upton Road bounds the site to the west and north and connects Upton to Romsey Road. Dwellings are located along this road and again vary significantly in style from large modern detached properties to semi-detached properties of a more traditional design.
- 3.7 There is an area of woodland to the north of the site and agricultural land to the north west. Romsey Golf Course is located to the north east. A Large Southern Electric site is located to the west.
- 3.8 Upton triangle is located within close proximity to the M27 and is bound by Romsey Road which provides direct access to Southampton. Romsey Road connects to Shirley Road which links to the City Centre.





- 3.9 Vehicular access into the site is currently provided from Upton Road in the northern most corner of the site.
- 3.10 The site is bound by a footpath to the south and a set of stairs provide access to the site from Lymer Villas.

- 3.11 Upton Triangle is generally flat, although there are slight variations in level as you move across the site. It sits level with the areas to the north and east. As you move from north east to south west the level of the surrounding area falls. The lowest point, to the south west of the site, sits a few metres below the site level.
- 3.12 The site is not subject to any international or national designations.
- 3.13 High voltage pylons currently cross both the north and south of the site in a west to east direction. In addition there is a substation within the south of the site and one on the eastern boundary.
- 3.14 The site is not identified to be at risk from flooding from a watercourse on Environment Agency Maps.

The Proposal

- 3.15 In terms of its location and characteristics, the Upton Triangle is well suited to deliver development. A key benefit of the site is its close proximity to an existing higher order settlement and its relationship with main transport routes into and out of Southampton, including the M27 and Romsey Road.
- 3.16 The development of this 4.5 hectare site would delivery approximately 100 appropriately designed homes and would respond positively to the context of the site, whilst contributing to the needs of the existing and future community.
- 3.17 The site would provide an opportunity to deliver a range of homes as well as open space. Medium to low density development would help to reflect the local character and respond appropriately to development frontages and edges.
- 3.18 The suggested capacity takes account of the constraint associated with the electricity pylons, which are likely to remain in situ.
- 3.19 Current access is taken from Upton Lane. To improve the efficiency of the site it is proposed that access will be taken directly from Romsey Road.
- 3.20 The site is regularly cultivated and the field margins are narrow, comprising native hedgerows. The site is considered to be of low ecological value.





Site Deliverability

3.21 The site is within the ownership of the client and is free from significant constraint. The site could be easily developed and delivered within the early parts of the plan period.

Benefits of the Proposal

- 3.22 The development provides the opportunity to deliver residential development in a sustainable location. The site is well related to the existing settlement of Nursling and its development represents a natural and discreet rounding off.
- 3.23 The opportunity exists to deliver appropriate affordable housing, open space and amenity space as part of the development which will serve future residents and the local area.
- 3.24 As a development of some scale, it will generate significant economic impacts, including the generation of additional council tax receipts, whilst also contributing to the local economy during construction.

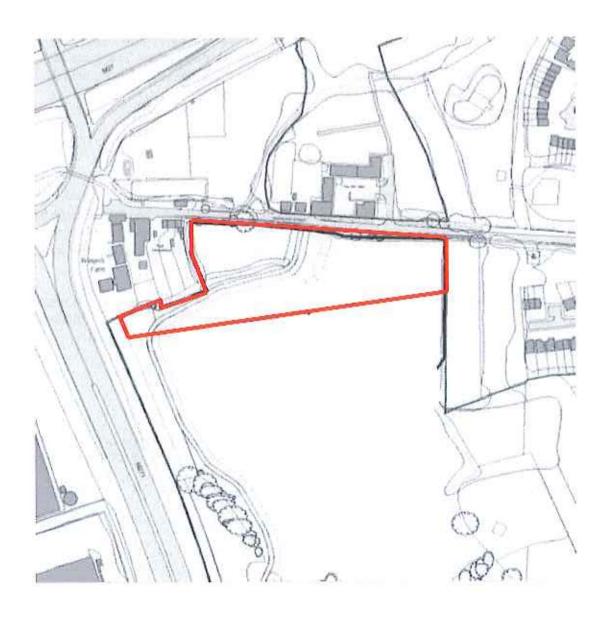
Concluding Remarks

3.25 The site is commended to TVBC for allocation for residential development in the emerging Local Plan.

4. Land at Nursling Street, Nursling

The Site

- 4.1 The site extends to approximately 1.3hectares and is located to the south of Nursling Street, sitting at the northern end of Adanac Park. It has an extensive frontage to Nursling Street and extends southwards to a fenced boundary. This southern boundary is the edge of the site that is currently the subject of a planning application for employment development (by Oceanic Estates).
- 4.2 The site is made up of two principal areas of land, the first is a small paddock, which sits in the north western corner. This is bounded by the current permissive footpath / cycleway, Nursling Street and cottages, which themselves front Nursling Street. The second area forms part of the wider Adanac Park and is an open field used for the casual grazing of horses.



Site Context

- 4.3 The site currently forms part of the employment allocation at Adanac Park, but is not considered appropriate for that use due to its proximity to the residential development along Nursling Street and the desire to create a form of development that better reflects the character of the area.
- 4.4 The loss of this small site from the wider allocation does not impact on employment land supply to any significant degree and the emerging proposals by Oceanic Estates do not include this site as part of their business / industrial park proposals.
- 4.5 The site offers the opportunity to provide an attractive road frontage to Nursling Street and can act as a buffer to the more intensive employment uses coming forward to the south.
- 4.6 The site has been promoted for residential development previously (including an additional area to the south). This application was refused, primarily on the basis of the lack of justification for the loss of employment floor space and a local highway issues (associated with parking at the school). In refusing the scheme, no other technical constraints were identified.

The Proposal

- 4.7 The proposed development of the submission site relates to residential development and could accommodate a scheme of 30-40 dwellings, based on a medium to low density, or a higher capacity if a more intensive density were applied. The proposals are flexible in nature, to allow a variety of scales of use to come forward.
- 4.8 The provision of residential based uses, rather than employment is considered appropriate to respond to the character of Nursling Street and provide a transition to the more intensive employment development to the south.

Site Deliverability

4.9 The site is available for development and could come forward in the early part of the plan period. It has an extensive road frontage and is free from significant constraint.

Benefits of the Proposal

4.10 The proposed development would realise a reasonable scale of residential development, including the potential for an element of affordable and for open space.

Concluding Remarks

4.11 The site is commended to TVBC for allocation for residential development and by implication, deletion from the existing employment allocation for Adanac Park.

5. Land at Paulet Lacave Avenue, Nursling

The Site

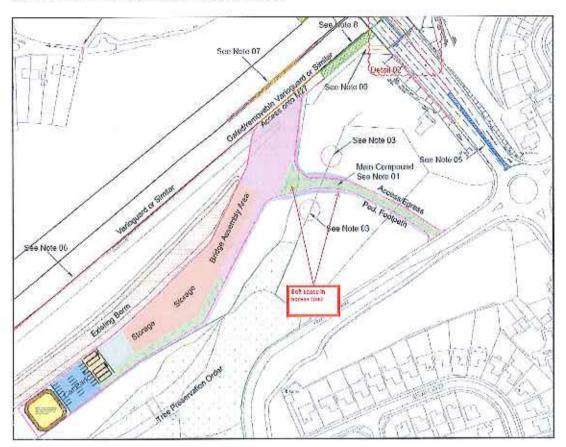
- 5.1 The opportunity at Paulet Lacave Avenue comprises two areas of land to the north and south of the road. Both are currently used for the grazing of horses.
- 5.2 The sites sit within the settlement of Nursling and represent an opportunity for a minor rounding off of the urban edge.



Site Context

5.3 The site sits to the south of the M27 and is adjacent to Romsey Road. When taken together with the existing residential dwellings to the east and south of the site, its context is urban.

5.4 Part of the site is currently being used temporarily for the construction of the M27 bridge. This includes a bridge assembly area and storage. It has also required the construction of an access route through the site.



The Proposal

- 5.5 The site provides an opportunity for a mix of residential development and provision of amenity space, possibly in the form of an extension to the existing allotments site.
- 5.6 The extent of residential development will be determined by consideration of the site specific context, including the impact of noise from the M27. As such, the residential elements will focus on the areas immediately adjacent to Paulet Lacave Avenue, with the remainder of the site being used for open space.

Site Deliverability

- 5.7 The site is owned by the Trustees of the Barker Mill Estates, who support its early release for development.
- 5.8 The site is subject to a S106 agreement relating to a previous residential development to the south and west of the site. This allows for alternative uses (to agriculture) with the written agreement of the Borough Council.

5.9 On this basis, with the agreement of the Council, the site could be freed from this restriction and be brought forward for development within the early part of the plan period.

Benefits of the Proposal

5.10 The utilisation of this underused area of land can contribute towards meeting development needs and could support the delivery of open space provision that would be of benefit to the existing community. This could include an extension to the existing allotment area to the west of the site.

Concluding Remarks

5.11 The site is commended to TVBC for allocation for residential development and open space.

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