Endough And Andrews

Planning Policy

From:

Daniel Ramirez < c

Sent:

14 September 2018 13:14

To:

Planning Policy

Subject;

Test Valley Issues and Options Consultation - Representations on behalf of Pigeon

Investments Management Ltd - Fields Farm, Rownhams

Attachments:

Representations - TVBC Issues and Options Consultation on behalf of Rown....pdf

Dear Sir / Madam,

Please see attached representations towards the Test Valley Issues and Options Consultation for the Next Local Plan on behalf of Rownhams Promotions Limited.

Please disregard the previous version of the representation sent earlier today,

Rownhams Promotions Limited is also promoting land at Fields Farm, Rownhams Lane, Rownhams for residential development. These representations set out the rational and justification for the allocation of this site in the new Local Plan.

We look forward to confirmation of receipt of these representations and would of course be happy to discuss any element of the comments with the Council.

Kind regards,

Senior Planner

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Representations towards the Test Valley
Issues and Options Consultation for the Next
Local Plan on behalf of Rownhams Promotions
Limited

Fields Farm, Rownhams Lane, Rownhams

September 2014

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Contents

1. Intro	duction	3
2. Resp	onse to Local Plan Questions	5
3. Field	ls Farm: Site Specific Comments	13
Appendix 1:	Ownership Plan	
Appendix 2:	Key Facilities and Bus Routes Plan	
Appendix 3:	Combined Masterplans	
Appendix 4:	Fields Farm Draft Illustrative Masterplan	
Аррелdix 5:	Planning and Delivery Statement	

Daniel Pomirer

Client

Pigeon Investment Management Limited

Our reference ROWW3001

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 Rownhams Promotions Limited ('client') who is promoting land at Fields Farm, Rownhams Lane, Rownhams ('the Site') 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
 - 15. Housing needs of the elderly
 - 16: Mix and Type of Housing
 - 20: Accessible/Adaptable/Wheelchair user dwellings
 - 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 specific comments in relation to the Site, which have been informed by technical work undertaken to date in relation to the application/appeal proposals. It is acknowledged that the proposals set out in

¹NPPF, paragraph 214.

- these representations will require refinement to address the emerging policy context and the reasons for refusal set out in the appeal decision (see below).
- 1.5 An updated Illustrative Masterplan and Vision Document to illustrate how the proposed development at Fields Farm could be successfully designed and delivered within the Site is being prepared and can be shared with the Council in due course.

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 in 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 Co-operate. 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 determine what uplift to the 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 sub-regional 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. Engagement with the Council's neighbours should be undertaken early and SOCG progress reported.

² NPPF, paragraph 35

⁹ NPPF, paragraph 60

- 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.
- 2.8 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.
- 2.9 Finally, we note that the Government will be reviewing the SM following the publication of the 2018 household projections to ensure that housing numbers 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?

- 2.10 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.
- 2.11 The NPPF requires Local Plans to be positive and proactive in their approach to building a strong and competitive economy. The UK industrial Strategy for the UK 'Building a Britain fit for the future' also recognises the importance of housing to the economic success of the UK's cities and regions and outlines a comprehensive policy package that aims to raise housing supply.
- 2.12 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 Co-operate) 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 Whilst 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's 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 supply 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 Borough 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. 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.
- 2.19 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.

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⁴ Paragraph 65

- 2.20 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.
- 2.21 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.
- 2.22 In this context, setting aside the administrative boundaries, Nursling / Rownhams is functionally and physically part of Southampton City. Nursling / Rownhams 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. Further detail on the sustainability of the location is set out in Section 3 of these representations.
- 2.23 It is our client's view that the relationship between Nursling / Rownhams and Southampton needs greater recognition in the emerging plan, and there is a strong argument that Nursling / Rownhams 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 / Rownhams. This, in our view, is a clear manifestation that the synergies between Nursling / Rownhams and Southampton are not fully appreciated. 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 Nursling / Rownhams' latent potential for meeting the Borough's development needs.
- 2.24 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.

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

2.25 See comments on Question 7 above.

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⁵ Consultation Document, Paragraph 5.9

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

- 2.26 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.
- 2.27 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).
- 2.28 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.
- 2.29 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 15: Should the Council change its approach and set out a requirement that certain sites should provide for the needs of such groups as the elderly?

- 2.30 As set out in Paragraph 3.3, the proportion of the aged population (65+) In Test Valley is expected to Increase at a higher rate (at 17.7%) compared to that of Hampshire (14.2%), with the proportion of residents aged 85+ expected to increase significantly in Test Valley (35.5%) compared to Hampshire (23.8%) by 2024.
- 2.31 There is a clear need for older persons housing provision in Test Valley Borough, which is only likely to increase over time. The NPPF is clear on Council's duty to ensure that older persons housing needs are assessed and reflected in local planning policies⁶.
- 2.32 A proactive approach to delivering older persons housing is therefore to be welcomed. It will, however, be important that the Council discusses the potential for older housing provision (including the type of affordable housing) with site

⁶ Paragraphs 59 and 61

promotors at an early stage to ensure that such housing is deliverable as part of a wider housing mix.

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?

- 2.33 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.
- 2.34 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.
- 2.35 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 its 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?

- 2.36 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.
- 2.37 PPG⁷ 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;

Paragraph: 001 Reference ID: 56-001-20150327

- how needs vary across different housing tenures; and
- the overall impact on viability.
- 2.38 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 33: Should we continue to retain the principle of Local Gaps? Should we define specific boundaries or a more general policy which alms to avoid coalescence?

- 2.39 National Planning Policy does not provide explicit support for '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.
- 2.40 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 Policy Maps. 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.
- 2.41 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?

- 2.42 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.
- 2.43 We would hope that the proactive approach being used by 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.
- 2.44 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?

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.

3. Fields Farm: Site Specific Comments

The Site

- 3.1 The Site comprises 8.43 ha of land which fronts onto and has existing vehicular access to Rownhams Lane. The Site is owned by The Barker Mill Estate (TBME) with Rownhams Promotions Limited holding a Promotion Agreement, with the exception of two dwellings and a small section of access track (that provides access to White Lodge and Fields Cottage). Fields Farmhouse is located towards the centre of the Site and would be demolished as part of the proposal. Appendix 1 details the 'red line' boundaries of the land subject to the Promotion Agreement with the 'blue line' indicating the wider TBME land ownership.
- 3.2 The Site is largely flat and open but with a very gradual slope down from west to east. At the rear of the Site the fall steepens. Land at the southern edge of the Site slopes steeply from north to south down toward the public right of way (bridleway) which links Rownhams Lane to Lordswood, and forms the administrative boundary between Southampton City and Test Valley Borough. The slope and woodland (Rownhams Meadow SINC) preclude development within these areas. Lordswood (designated Ancient Woodland) forms the eastern boundary to the Site and is also under the control of TBME.
- 3.3 There is a high pressure gas pipeline that passes through the Site from east to west. Telephone lines are located along part of the site alongside the existing access track and toward Field Farmhouse.
- 3.4 The Site is bounded to the west by Rownhams Lane and associated residential properties. A mix of trees and hedgerows follow an access track along the northern boundary of the Site across toward the east and Lordswood. Beyond this track is the further agricultural land known as Parkers Farm, which was granted planning permission for 320 new homes and supporting uses in July 2015. Further information on this proposal in the context of the Fields Farm Site is set out below.

Site Context

- 3.5 The Site is located at the eastern edge of Rownhams. To the west of the Site there are residential properties located along Rownhams Lane. Beyond the Site to the south is the built edge of Lords Hill (within the Southampton City administrative area).
- 3.6 Rownhams is identified in the adopted Local Plan as a 'Key Service Centre' (second tier settlement) and an appropriate location for growth including 'strategic allocations'⁸. Our client supports the continued identification of the settlement as a sustainable and logical location for growth through the new Local Plan.
- 3.7 The Site benefits from a range of local services and facilities with good access to local schools employment and shopping opportunities all within a short walking

⁸ Revised Local Plan 2011-2019, Table 7

- and cycling distance. The Site is close to the M27 and M271 and has good accessibility into central Southampton including frequent bus services operating routes near to the Site's access. A Plan of the key facilities and bus services in close proximity to the Site are shown at **Appendix 2**.
- 3.8 Immediately to the north of the Site is Parkers Farm. An outline application (LPA Ref: 14/00726/OUTS) was submitted on the Parkers Farm site for up to 320 dwellings, a 60 unit extra care facility and construction of a livery stable. The application was allowed on appeal (PINS Ref: APP/C1760/A/14/2224913) in June 2015. A reference plan is provided at Appendix 3 that superimposes the Fields Farm Illustrative Masterplan with that of Parkers Farm site. This demonstrates how the two schemes relate to each other and how successfully integration of the development proposals can be achieved.
- 3.9 Taylor Wimpey has now taken control of the majority of the Parkers Farm site and is in the process of discharging the reserved matters on the residential elements of the scheme. It is understood that the approved infrastructure RM phase will commence soon, with the residential phases (which have resolution to approve) will follow shortly after. This will significantly change the context for the Site and surrounding area.
- 3.10 Separate reserved matters applications are being progressed for the care home and livery elements. Once complete, development at Parkers Farm will alter the character of the immediate locality, further consolidating the residential/suburban context of the Fields Farm Site. Development beyond the existing properties fronting Rownhams Lane will extend the built up area boundary of Rownhams further east of its current location so it is contiguous with the northern boundary of Fields Farm. Following completion of the development, the Fields Farm Site will effectively be bounded to the north and west by residential development.

The Proposal

- 3.11 The Fields Farm Site was promoted through the now adopted Local Plan and was also the subject of a refused outline planning application (LPA Ref: 15/00355/OUTS) and subsequent dismissed appeal (PINS Ref: APP/C1760/W/15/3139021). The proposal consisted of an outline application for demolition of one dwelling and outbuilding and erection of up to 140 dwellings (Use Class C3) including access, associated landscaping, open space and management of the SINC. Details of the access were provided for determined with all other detailed matters reserved.
- 3.12 The Site was also resubmitted to the Council as part of its call for sites earlier in the year.
- 3.13 These representations are supported by a Draft Illustrative Masterplan which formed part of the appeal proposals. This Masterplan has been submitted to support these representations and to provide an indication of how the Site could be developed (Appendix 4). In summary, the Draft Masterplan provides for:
 - Up to 140 new homes (including an element of affordable housing);

- New and improved access;
- Retention of boundary trees and vegetation and new landscaping /planting (including landscape buffers to adjoining existing residential properties);
- Appropriate easement for gas pipeline;
- Ecological management of the SINC;
- Formalised public access and creation of SANG at Lordswood;
- SUDS, parking and open space and play space in line with Council requirements;
 and
- Potential non-vehicular link to the Parkers Farm site.
- The Masterplan is currently being refined and an updated Masterplan and Vision
 Document to illustrate how the proposed development at Fields Farm could be successfully designed and delivered within the Site can be shared with the Council in due course.
- 3.15 It should be noted that Rownhams Promotions Limited are open to considering as part of the development mix an element of bungalows and potential specialist care provision to help address the ageing demographic of the Borough, and would be open to discussing this option further with the Council in due course.

Site Deliverability

- 3.16 As part of the application / appeal a considerable amount of technical work was undertaken to support the development proposal. The evidence base in support of the Site is listed below, and can be shared with the Council, if required.
 - Arboricultural Report
 - Biodiversity Checklist
 - Habitats Regulations Screening
 - Extended Phase 1 Ecological Survey
 - Phase Two Ecological Assessment
 - Ecological Management Plan
 - Nolse Assessment
 - Transport Assessment (and Technical Notes)
 - Design and Access Statement
 - Air Quality Assessment

- Desk Based Archaeological Assessment
- Landscape and Visual Impact Appraisal
- Geo-technical Report
- Utilities Assessment
- Detailed Gradiometer Report
- Statement of Community Engagement
- Flood Risk and Drainage Strategy
- 3.17 It should be noted that through the SOCG for the appeal, all technical issues were resolved save for landscape issues which are addressed in detail below. All highways and transport issues were resolved and no objection to the access proposals was raised by the Highways Authority.
- 3.18 In light of the Inspector's appeal decision, Rownhams Promotions Limited are in the process of reviewing the Draft Masterplan to address the issues raised by the Appeal Inspector.
- 3.19 The appeal was refused on two grounds: conflict with the development plans and detrimental impact on the appearance and on the landscape character.
- 3.20 Turning to the principle of development and conflict with the development plan, as the Council seeks to review its development strategy and housing allocations, the concerns raised by the inspector in relation to conflict with the development strategy and timing of the release of the Site in this context can be set aside.
- 3.21 The appeal decision notes that the Site is not designated for its landscape value but highlights that the appeal scheme would bring about a complete change in the landscape character through the introduction of roads and houses in a predominantly open and undeveloped area. This is accepted, but this urbanising effect would be an inevitable consequence of development of the Site and could equally be applied to any greenfield site which is identified for development.
- 3.22 Turning to the visual impact, the inspector determined that a) the scale of the new development would be readily apparent from views into the Site at the proposed point of access leading to a loss of the current open view towards the skyline of Lords Wood; and b) that harm would arise due to visual impact of 2 storey development from the Bridleway¹⁰.
- 3.23 Notwithstanding the above, Rownhams Promotions Limited are reviewing the built form, layout and location and arrangement of the greenspace together with the landscape and planting proposals across the Site. Further consideration is also being given to the building mass, height and siting particularly along the Southern

¹⁰ Appeal Decision, paragraph 25 and 30

⁹ Appeal Decision, paragraph 20 and 23

boundary of the Site. It is anticipated that once these changes have been implemented landscape impacts will be substantially reduced, and should assist the Council with the favourable consideration of the Site as a housing allocation in the new Plan. This consideration includes the early implementation of additional strategic landscaping, which is currently being planted.

- 3.24 We would highlight the fact that the Appeal Inspector recognised the economic (including provision of market and affordable housing) and environmental benefits (associated with management of the Rownhams Meadow SINC) of the appeal scheme. Likewise there was recognition by the inspector of the sustainable nature of the Site in terms of it being well located in terms of local facilities and employment opportunities.¹¹
- 3.25 An updated Masterplan and Vision Document to Illustrate how the proposed development at Fields Farm could be successfully designed and delivered within the Site is being prepared and can be shared with the Council in due course.
- 3.26 In the context of the National Planning Policy Framework's presumption in favour of sustainable development (Paragraph 11), further detail on Site deliverability has been provided in a separate complimentary report prepared by Pigeon Investment Management Limited on behalf of Rownhams Promotions Limited and attached at Appendix 5.

Benefits of the Proposal

- 3.27 The development proposal is capable of securing a number of planning benefits, which are listed below:
 - Planning contributions, subject to tests of appropriateness, towards:
 - Solent Recreational Mitigation Contribution;
 - Sports Ground/Formal Recreation;
 - Public Art;
 - Community Facilities;
 - Improvements of cycle lanes along Rownhams Lane;
 - Improvements to bus stop infrastructure;
 - A highways improvement scheme at the Bakers Drove/A3057/Redbridge Lane junction; and
 - Education (Primary School provision at Rownhams St Johns).
 - Provision, management and maintenance of the open space provided on-site, including new equipped play provision.

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 $^{^{17}}$ Appeal Decision, paragraph 65 and 67

- CIL, New Homes Bonus and Council Tax receipts and economic benefits through increased local expenditure and job creation.
- The provision of new housing, including affordable housing
- Travel Plan and Employment and Skills Plan
- Ecological benefits through management of the adjoining SINC
- On-site SANG provision, Including formalised access to Lords Wood

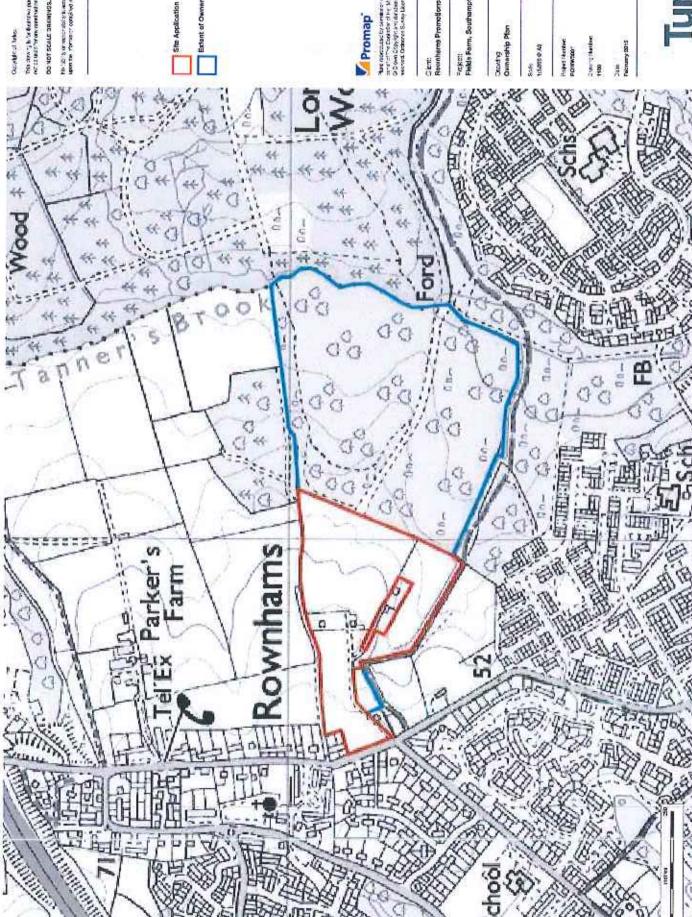
Concluding Remarks

- 3.28 In conclusion, there are no overriding constraints that cannot be mitigated thereby preventing the development of the Site. Rather, the work undertaken to date outlines the suitability of the Site for residential development.
- 3.29 Nursling / Rownhams is a sustainable settlement with good connectivity and a range of local services and facilities which are well related to the Site. Rownhams represents a logical and sustainable location for future planned growth going forward. New homes would help to support the settlements existing services and facilities (and those in Southampton) and also assist in providing affordable housing.
- 3.30 The character of the settlements would be retained. The Site represents an opportunity to deliver a modest expansion of Rownhams to the east. The Site could accommodate development that can be contained by the existing landscape and would be well related to the existing built-up area and could be well integrated with the large development to the north at Parkers Farm which by its nature will spread the settlement edge eastwards of Rownhams Lane beyond the Fields Farm Site.
- 3.31 It is considered that the Site could deliver a sustainable, high quality development that responds to the prevailing character of the area and can facilitate the delivery of market and affordable housing and ecological enhancements.
- 3.32 This document sets out Rownhams Promotions Limited working vision for the Site and demonstrates a credible and compelling development opportunity.
 Rownhams Promotions Limited remain committed to working with the Council, local community, neighbourhood plan group and other key stakeholders to refine the development proposals through the Local Plan process.

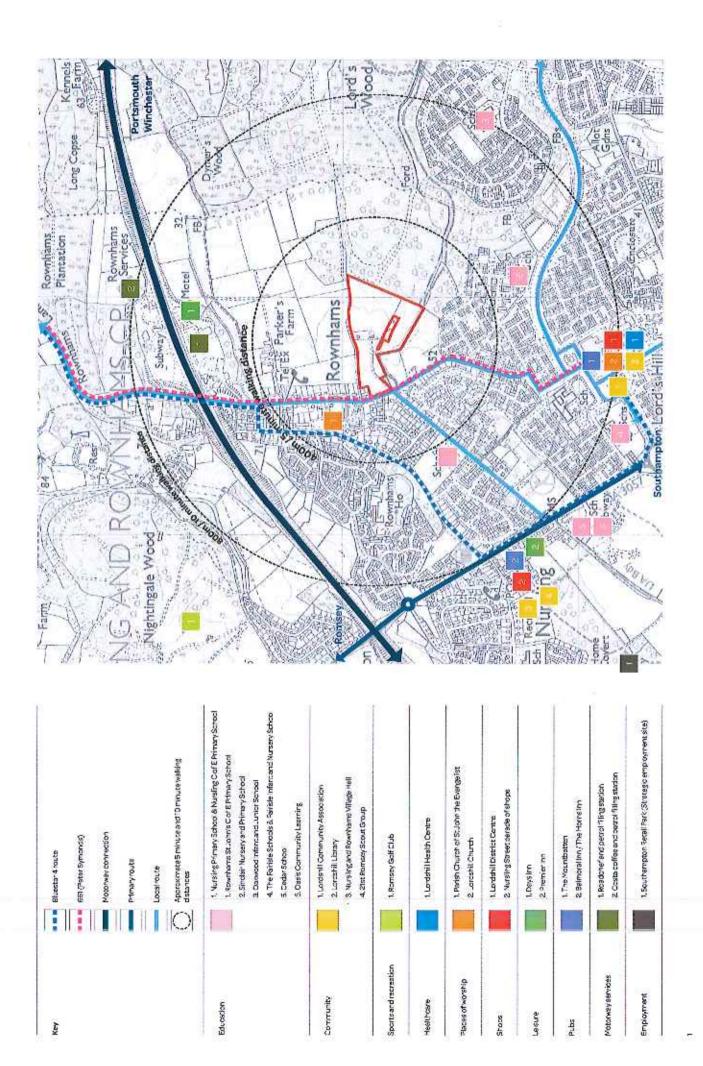
Appendix 1: Ownership Plan

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H. B.



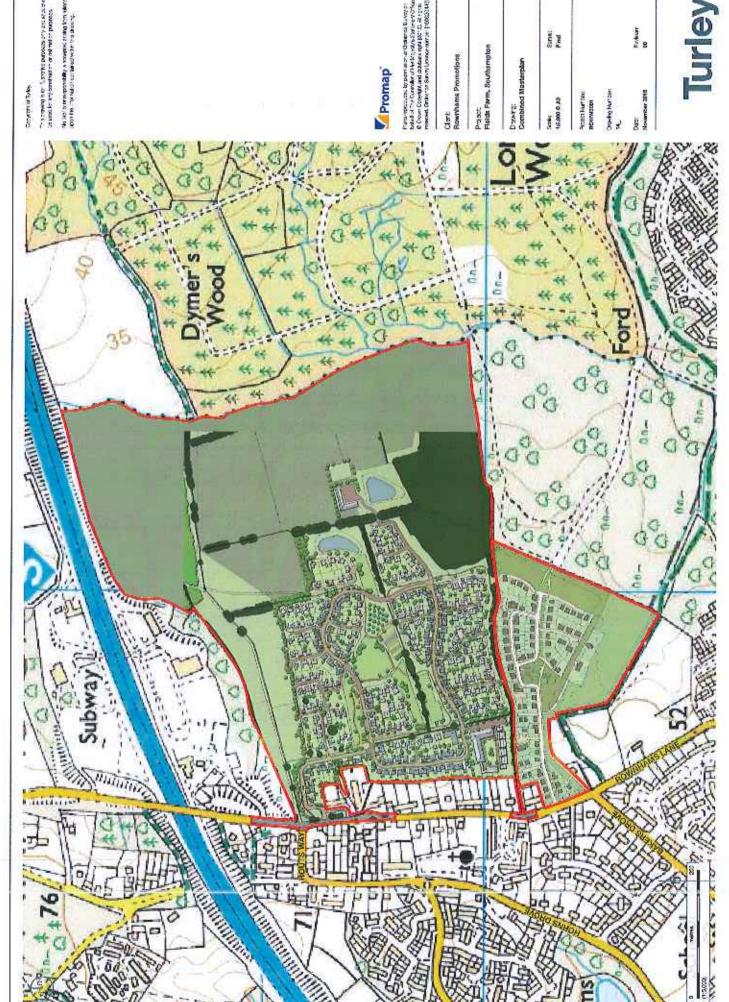
Appendix 2: Key Facilities and Bus Routes Plan



Appendix 3: Combined Masterplans

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Appendix 4: Fields Farm Draft Illustrative Masterplan



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Clerit Rownhams Promotions Limited

Project; Fields Form, Southampton

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PLANNING AND DELIVERY STATEMENT

FIELDS FARM ROWNHAMS LANE ROWNHAMS

SEPTEMBER 2018

Pigeon Investment Management Limited

Appendix 5: Planning and Delivery Statement

INTRODUCTION

1

- 1.1 The following statement has been prepared by Pigeon Investment Management Limited (Pigeon) on behalf of Rownhams Promotions Limited in support of a housing allocation on land at Fields Farm, Rownhams Lane, Rownhams for:
 - up to 140 dwellings, comprising market and affordable housing;
 - open space and play space, SUDS and parking in line with Council requirements;
 - new and improved access;
 - retention of boundary trees and vegetation and new landscaping/planting (including landscape buffers to adjoining residential properties);
 - ecological enhancements to the existing Rownhams Meadow SINC;
 - appropriate easements to an existing gas pipeline; and
 - potential non-vehicular link to the Parkers Farm site immediately to the north.
- 1.2 The site is owned by The Barker Mill Estate (TBME), a significant land owner in the Southampton, Test Valley and New Forest area. Rownhams Promotions Limited hold a Promotion Agreement for the site.
- 1.3 This statement has been prepared in response to the Test Valley Borough Council Local Plan tssues and Options consultation document, published in August 2018, in order to demonstrate the deliverability of the site in the context of the National Planning Policy Framework's presumption in favour of sustainable development (Paragraph 11). The statement compliments the wider representations to the consultation prepared on our behalf by Turley.
- 1.4 Paragraph 11 of the Framework states that for plan-making, the presumption in favour of sustainable development means positively seeking opportunities to meet the development needs of the area and meeting, as a minimum, the objectively assessed needs for housing and other uses, as /or a robust 5 year housing land supply the site could help to meet the District's housing need within the next 5 years.
- 1.5 The statement provides a description of the site's characteristics in order to demonstrate that it is a viable development site with no known constraints.
- 1.6 The statement provides a review of the site's planning policy context, describing how there are no specific policies in the Framework that indicate that development should be restricted, and that in light of paragraph 119 of the Framework (which stipulates that local planning authorities, and other plan-making bodies, should take a 'proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs', there is,

- in-fact, a clear case that sustainable development could come forward on the site in advance of the current Local Plan review, which is not due to be completed until 2021.
- 1.7 The statement also refers to the previous refused outline planning application (LPA ref. 15/00355/OUTS) and subsequent dismissed appeal (PINS Ref. APP/C1760/W/15/3139021) for Fields Farm. That application consisted of an outline application for up to 140 dwellings and associated landscaping, open space and management of the existing Rownhams Meadow SINC. Whilst that appeal was dismissed on grounds relating to conflict with the development plan (the current Local Plan) and detrimental impact on the appearance and landscape character, it did confirm in all other respects that the site is technically deliverable.

2 PHYSICAL CONTEXT

Site Location

- 2.1 The site comprises 8.43ha of land which fronts on to and has existing vehicular access to Rownhams Lane and is shown on the attached site plan as Appendix 1. The site is within the ownership of The Barker Mill Estate (TBME) with the exception of two dwellings and a small section of access track (that provides access to White Lodge and Fields Cottage).
- 2.2 The site is bounded to the west by Rownhams Lane and associated residential properties. To the north the site is bounded close to Rownhams Lane by two bungalows and an access track to the electricity substation beyond. A mix of trees and hedgerows follow the access track along the northern boundary of the site across towards the east and Lords Wood. Immediately to the north of the site, planning permission was granted on appeal in July 2015 for a residential development for up to 320 new homes and a 60 unit extra care facility; development has commenced on that site.
- 2.3 Dense woodland (ancient woodland) forms the eastern boundary to the site and, although outside the proposed site, is within the ownership of TBME. To the south, the site is bounded by further trees and hedgerows and the boundary generally follows the line of the public footpath which links Rownhams Lane to Lords Wood
- 2.4 The site is largely open. Fields Farmhouse is located at the central northern boundary of the site, and two private properties are located toward the southern boundary of the site (White Lodge and Fields Cottage). Telephone lines traverse part of the site alongside the existing access track and toward Field Farmhouse.

Topography and Landscape

- 2.5 The majority of the site is flat and open but with a very gradual slope down from west to east. At the rear of the site the fall is slightly steeper. Land at the southern edge of the site slopes steeply down toward a public footpath and this along with extensive trees precludes the development of these areas of the site. The urban edge of Southampton lies further to the south.
- 2.6 The site is not subject to any international or national designations.
- 2.7 The site is bounded by a Site of Importance for Nature Conservation (SINC) to the east and south although the area proposed is not directly affected by this designation.

Sustainable Location

- 2.8 Rownhams (and Nursling) is defined as a 'Key Service Centre' (a second tier settlement below the two Major Centres of Andover and Romsey) within the adopted Test Valley Local Plan 2011-2029 (TVLP). It benefits from a range of local services and facilities with access to local schools (including St John's Church of England Primary School on Bakers Drove and within easy walking distance of the site) and employment opportunities (a plan of the key facilities and bus services in close proximity to the site are shown at Appendix 2). The site is located within close proximity to the M27 and M271 with good accessibility into central Southampton including bus services which operate from the front of the site (Stagecoach service 46 which serves Lords Hill, Southampton, Hiltingbury, Hursley and Winchester).
- 2.9 As part of the evidence base for the adopted TVLP the Council produced a 'Settlement Hierarchy Topic Paper' (June 2014). In determining that Rownhams (and Nursling) should be identified as a 'Key Service Centre' along with 5 other settlements it is noted that Rownhams scored the highest (along with Stockbridge) in terms of a scoring system based on a range of criteria, including access to shops, education, health and leisure facilities, access to a station, public transport provision, job ratio (local employment opportunities), public houses and community facilities.
- 2.10 The availability of local services and facilities in Rownhams within walking distance (the settlement centre is within 600m), together with access to higher order services and employment opportunities (provided in Southampton to the south and Romsey to the north via public transport), demonstrate the inherent sustainability of land at Fields Farm Rownhams Lane, highlighting its potential to accommodate sustainable development.

3 PLANNING POLICY CONTEXT

National Planning Policy Framework

- 3.1 Paragraph 10 of the NPPF states that 'at the heart' of the Framework is a presumption in favour of sustainable development.
- 3.2 Paragraph 11 states:

"For plan-making this means that:

- Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
- Strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - The application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type of distribution of development in the plan area; or
 - Any adverse impacts of doing so would significantly and demonstrably outwelgh the benefits, when assessed against policies in this Framework taken as a whole."

"For decision-taking this means:

- approving development proposals that accord with an up-to-date development plan without delay; or
- Where there are no relevant development plan policies, or the policies which are most important for determination are out-of-date, granting planning permission unless:
 - The application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - Any adverse impacts of doing so would significantly and demonstrably outwelgh the benefits, when assessed against the policies in this Framework taken as a whole."
- 3.3 Paragraphs 38 of the Framework is also relevant. It states that "Local planning authorities should approach decisions on proposed development in a positive and creative way. They should use the full range of planning tools available...and work proactively with applicants to secure developments that will improve the economic, social and environmental conditions of

The area. Decision-takers at every level should seek to approve applications for sustainable development where possible."

Test Valley Borough Revised Local Plan 2011-2029

- 3.4 The Test Valley Borough Revised Local Plan (TVRLP) was adopted in January 2016.
- 3.5 The inset map (Inset Map 5) for (Nursling and) Rownhams Identifies the land at Fields Farm as falling outside the Development Boundary of the settlement and within the countryside
- 3.6 Policy COM2 (Settlement Hierarchy) states that new development will be confined to the areas within the boundaries of defined settlements. Development outside of the boundaries of settlements will only be permitted if it is appropriate in the countryside (i.e. Rural Exception Affordable Housing, Community Led Development, and Rural Workers Housing) or it is essential for the proposal to be located in the countryside.
- 3.7 It should be noted that land to the north of Fields Farm (Parkers Farm) which obtained outline consent on appeal on 8 July 2015 for up to 320 new homes and a 60 unit extra care facility, has not been designated as an extension to the development boundary of Rownhams on the adopted Inset Map forming part of the TVRLP. It is assumed, now that development on that site is moving forward, that any new inset map will look to include this site within the settlement boundary, which will by definition extend the settlement boundary eastwards beyond the eastern extremities of the Fields Farm site.

Test Valley Local Plan Issues and Options Consultation

- 3.8 The Issues and Options Consultation (fully titles as 'Our Future -- How do we plan for it? Issues and Options Consultation for the next local plan') is the first stage of public participation in the process of producing a new Local Plan. Once adopted the new Local Plan will replace the Test Valley Local Plan 2011-2029 which was adopted in January 2016.
- 3.9 The new Local Plan will set out the Council's development requirements (and allocate sufficient land to meet them) for the period up to 2036, including the level of new homes, jobs and infrastructure to meet the Borough's needs.
- 3.10 In the current Local Plan, the Council set out a housing requirement figure of 588 homes per annum between 2016 and 2029 to meet its 'objectively assessed needs' for housing development. In recognition of the new National Planning Policy Framework and a move towards applying a new national standard methodology for identifying housing needs, the issues and Options Consultation refers to an approximate target of 570 homes per year for Test Valley based on the standard methodology and indicative local housing need figures published by the Government in September 2017. The standard method for assessing

housing need is to be applied to all emerging Local Plans which are submitted for examination post 24 January 2019 and as the new TVLP will be submitted beyond this timeline it will be subject to the new standard methodology. However, the 'indicative' local housing need set out in September 2017 is likely to be subject to further change so cannot be relied upon at this juncture as the prescribed annual targets and could be adjusted upwards or downwards.

- 3.11 Whichever figure is ultimately defined for Test Valley, it is clear that the Council will need to significantly boost its supply of housing and a range of different size and type of new housing sites will be required in order to achieve this, including allocating sites to meet need across the extended plan period (7 years).
- 3.12 Land at Fields Farm Rownhams is capable of providing a meaningful contribution towards the District's overall development requirements for the period up to 2036 and indeed given the unencumbered nature of the site could assist the Council in meeting the Council's 5-year land supply requirements and the new NPPF 'Delivery Test'.

4 DELIVERABILITY

- 4.1 The previous sections of this statement have demonstrated that land at Fields Farm Rownhams is an appropriate location for development, both in terms of its physical and planning policy context and its ability to promote sustainable travel patterns. The site can therefore be considered developable.
- 4.2 To be considered 'deliverable', Annex 2 (Glossary) of the Framework states that sites should be:
 - Available now:
 - Offer a suitable location for development now;
 - Be achievable with a realistic prospect that housing will be delivered on the site within 5 years;
 - Subject to detailed planning permission and extant and with no evidence that they are no longer viable, there is no longer demand for the type of units or sites have longer term phasing plans;
- 4.3 Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register, should only be considered deliverable where there is clear evidence that housing completions will begin on site within 5 years
- 4.4 Taking into account policy requirements for affordable housing, infrastructure contributions, and the normal costs of development and mitigation, initial development appraisal of the site indicates that development will provide competitive returns to a willing land owner and a willing developer. It can therefore be considered viable.
- Land at Fields Farm is the subject of a Promotion Agreement between the landowner and Pigeon and can therefore be considered available for development now, subject to obtaining planning permission. The clear intent from the landowner and the promoter (Rownhams Promotions Limited) to develop the site is recognised by the fact that a previous outline planning application for this site was submitted in 2015 (LPA ref. 15/00355/OUTS). Although that application was ultimately dismissed on appeal in October 2016, we remain of the view that the site would form a logical and sustainable location for growth and there continues to be a strong intent to bring the site forward as a sequentially preferable site for a residential-led allocation.
- 4.6 The scale of residential development proposed (up to 140 new homes) would be deliverable over a 2-3 year period with an average of 30-50 market dwellings delivered per annum and

the affordable housing element of the scheme (56 affordable homes based upon current policy requirements) delivered within two years from commencement.

- 4.7 As stated above, the Fields Farm site has been subject of a previous outline planning application (LPA ref. 15/00355/OUTS) and subsequent dismissed appeal dated October 2016. The appeal was dismissed on two grounds: conflict with the development plan (TVRLP) and detrimental impact on appearance and landscape character.
- 4.8 In terms of the principle of development and conflict with the development plan, as the Council are through the Local Plan Issues & Options Consultation seeking to review its development strategy and housing allocations, the concerns raised by the Inspector in relation to conflict with the development strategy and timing of the release of the Site in this context can be set aside.
- 4.9 The appeal decision recognised that the site is not designated for its landscape value but highlights that the appeal scheme would bring about a complete change in the landscape character through the introduction of roads and houses in a predominantly open and undeveloped area. This is accepted, but this urbanising effect would be an inevitable consequence of development of the site and could equally be applied to any greenfield site which is identified for development.
- 4.10 In terms of landscape character, the Inspector determined that (a) the scale of the new development would be readily apparent from views into the site at the proposed point of access leading to a loss of the current open view towards the skyline of Lords Wood; and (b) that harm would arise due to visual impact of 2 storey development from a Bridleway.
- 4.11 In response to these landscape/visual impact concerns, it is considered that through further refinement of the built mass, height and siting of new homes, along with additional soft landscaping (particularly along the southern boundary of the site), it would be possible to substantially reduce landscape impact which should assist the Council with a favourable consideration of the site as a housing allocation in the new Plan.
- 4.12 It should be noted that as part of the application/appeal a considerable amount of technical work was undertaken to support the development proposal. The Statement of Common Ground for the appeal confirmed that all technical issues were resolved and agreed (save for landscape issues) which demonstrates that subject to the resolution of scheme design issues with respect to landscape the site is deliverable.
- 4.13 The evidence base in support of the site (forming part of the planning application/appeal) is comprehensive and subject to any necessary updates (for example ecology updates) confirms

that the site is a suitable location for accommodating sustainable development. The suite of documents and assessments that have been undertaken include the following:

- Arboricultural Report
- Biodiversity Chechlist
- Extended Phase 1 Ecological Survey
- · Phase 2 Ecological Assessment
- Ecological Management Plan
- Noise Assessment
- Transport Assessment (and Technical Notes)
- Design and Access Statement
- Air Quality Assessment
- Desk Based Archaeological Assessment
- Landscape and Visual Impact Appraisal
- Geo-technical Report
- Utilities Assessment
- Statement of Community Engagement
- Flood Risk and Drainage Strategy

5 DESIGN CONCEPT

- 5.1 The design concept for Fields Farm will need to be developed to response to the previous appeal decision referred to above and more specifically through further engagement with local stakeholders including both the Planning Authority and the local community.
- 5.2 However, in order to demonstrate the site's ability to deliver sustainable development a draft Illustrative Masterplan is attached, based upon the site's opportunities and constraints.
- 5.3 The draft Illustrative Masterplan shows a scheme for:
 - up to 140 new homes (including market and affordable housing);
 - open space and play space, SUDS and parking in line with Council requirements;
 - new and improved access;

- refention of boundary trees and vegetation and new landscaping/planting (including landscape buffers to adjoining residential properties);
- ecological enhancements to the existing Rownhams Meadow SINC;
- appropriate easements to an existing gas pipeline; and
- potential non-vehicular link to the Parkers Farm site immediately to the north.
- 5.4 As stated above, the design concept will be developed following engagement with local stakeholders. At this stage, however, it is envisaged that the proposed development will provide for:

Comprehensive master-planned development based upon the site's natural landform and physical features.

Integration and connectivity with the existing village utilising existing footpath connections to promote sustainable travel patterns.

High quality sustainable development providing energy efficient buildings constructed using the latest sustainable construction techniques.

Low to medium density development, incorporating local architectural styles to reflect the character of the surrounding area.

High quality landscaping including the retention of established boundary trees and vegetation and the planting of new landscaping/planting (including landscape buffers to adjoining residential properties);

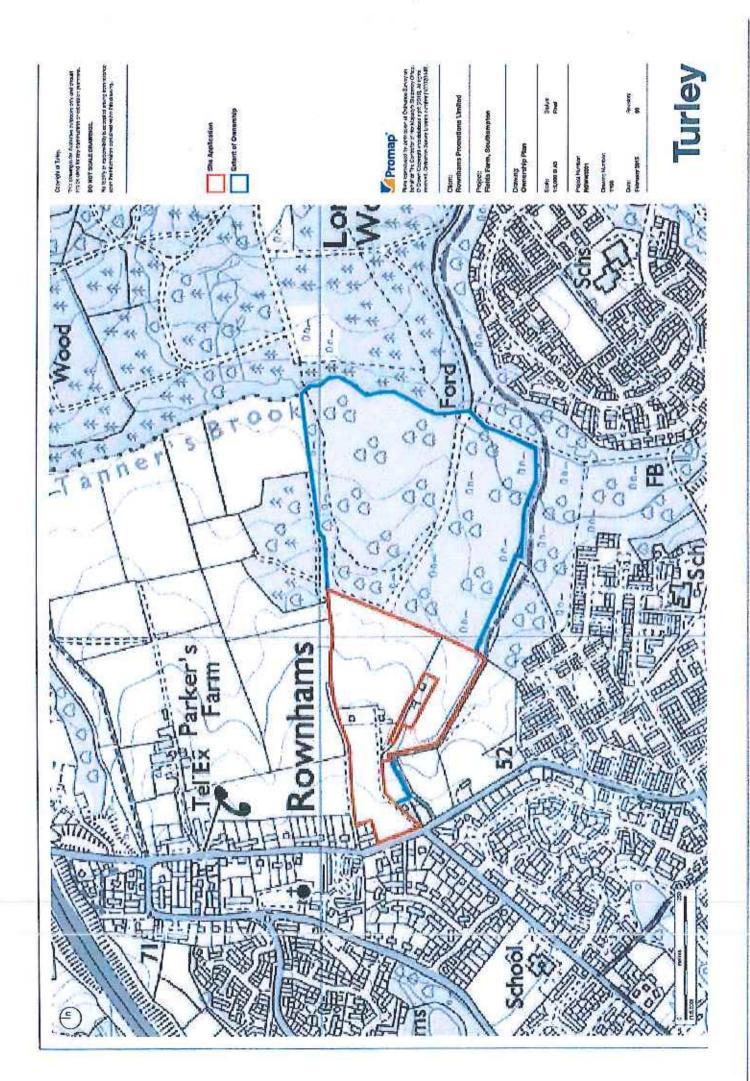
Recreational open space including play spaces in line with Council requirements.

Sustainable drainage measures to provide for surface water drainage whilst also contributing to the amenity and biodiversity of the development.

6 SUMMARY & CONCLUSION

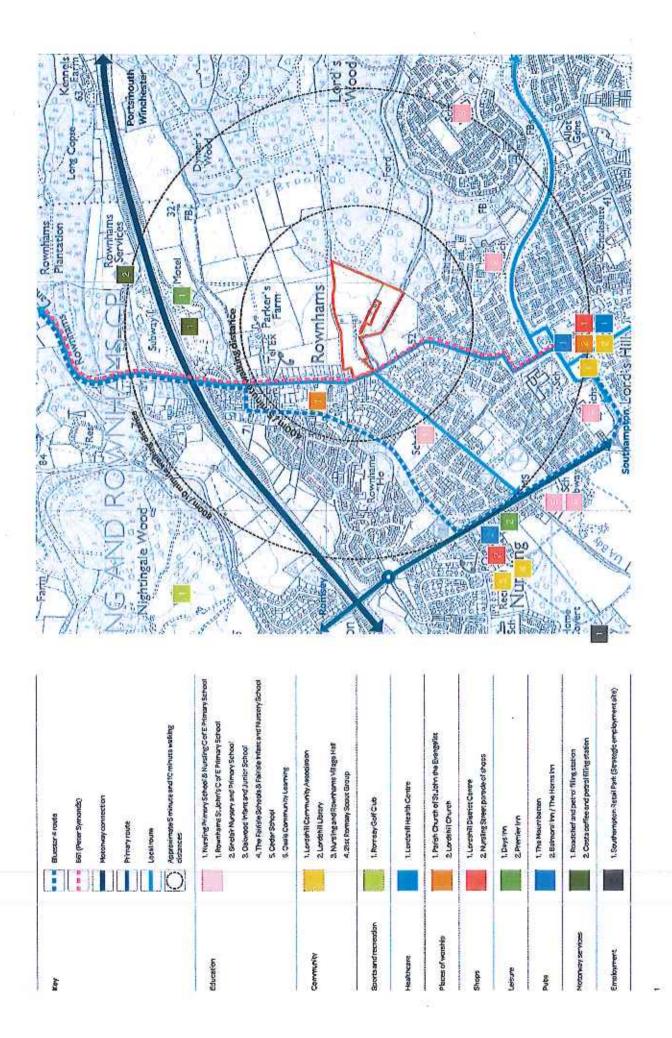
- 6.1 This statement has been prepared in response to the Test Valley Local Plan Issues and Options consultation document, published in July 2018, in support of land at Fields Farm Rownhams.
- 6.2 The statement demonstrates that the Fields Farm site is deliverable in the context of the National Planning Policy Framework's presumption in favour of sustainable development and provides a preliminary illustrative masterplan (attached as Appendix 3) which identifies how the site could be developed to deliver a high quality sustainable residential-led scheme comprising:
 - up to 140 new homes (including market and affordable housing);
 - open space and play space, SUDS and parking in line with Council requirements;
 - new and improved access;
 - retention of boundary trees and vegetation and new landscaping/planting (including landscape buffers to adjoining residential properties);
 - ecological enhancements to the existing Rownhams Meadow SINC;
 - appropriate easements to an existing gas pipeline; and
 - potential non-vehicular link to the Parkers Farm site immediately to the north.
- 6.3 The statement has described how the site is capable of meeting the development needs of the area by delivering sustainable development based upon the site's landform, physical context, and general location which would be a natural extension to Rownhams which is a highly sustainable settlement due to its range of facilities and services.
- 6.4 The statement has demonstrated that the site is viable with no known technical constraints and that a residential allocation for this site could be considered appropriate for early delivery within the plan's housing trajectory as subject to planning permission it could be delivered within 2-3 years.
- 6.5 The statement has also provided a review of the site's planning policy context, describing how there are no specific policies in the Framework that indicate that development should be restricted, and that in light of paragraphs 10 and 11 of the Framework there is a clear and compelling case for bringing forward sustainable development on the site in advance of the Local Plan review.

APPENDIX 1 - SITE LOCATION PLAN



APPENDIX 2 - KEY FACILITIES AND BUS ROUTES

Land at Fields Farm Rownhams Lane, Rownhams



APPENDIX 3 - DRAFT ILLUSTRATIVE MASTERPLAN



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