
APPLICATION NO.	20/02791/FULLS
APPLICATION TYPE	FULL APPLICATION - SOUTH
REGISTERED	24.11.2020
APPLICANT	Wynford Properties Ltd
SITE	Wynford Industrial Park, Belbins, Romsey, SO51 0PW, ROMSEY EXTRA
PROPOSAL	Change of use of land adjoining industrial estate to open storage, with associated hard surface, security fence, landscape bund, woodland and surface water drainage
AMENDMENTS	Received on 23.02.2021: <ul style="list-style-type: none">• Additional commercial information Received on 19.02.2021: <ul style="list-style-type: none">• Amended Landscape information Undertaken on 04.02.2021: <ul style="list-style-type: none">• Amendment to proposal description to include reference to hard surfacing and security fence Received on 26.01.2021: <ul style="list-style-type: none">• Additional commercial information• Open Storage Assessment Received on 18.01.2021: <ul style="list-style-type: none">• Amended Ecological Appraisal• Additional Landscape and Drainage information
CASE OFFICER	Mr Graham Melton

Background paper (Local Government Act 1972 Section 100D)

1.0 INTRODUCTION

1.1 The application is presented to Southern Area Planning Committee because it is contrary to the provisions of an approved Development Plan, adverse third party representations have been received and the recommendation is for permission.

2.0 SITE LOCATION AND DESCRIPTION

2.1 The application site is an area of land measuring approximately 4.9 hectares located on the north-east side of Sandy Lane, situated alongside and accessed via Wynford Industrial Park.

3.0 PROPOSAL

3.1 The proposal is a retrospective application for the change of use of land to open storage and the installation of hardstanding, security fencing and landscape bund for the north-east section of the site measuring approximately 1.75 hectares.

3.2 In addition, the application also includes the proposed planting of a mature woodland and surface water drainage measures to the north, east and south of the area identified in paragraph 3.1.

3.3 In support of the application, the following supporting documents have been submitted:

- Breakdown of location of people on the storage waiting list
- Open Storage Assessment
- Letters of support from Caravan Storage Site Owners Association, Viscount Leisure and previous Borough Local Ward Member Hibberd
- Landscape viewpoint sheets
- Woodland Management Plan
- Ecological Impact Assessment
- Flood Risk Assessment
- Transport Statement

4.0 **RELEVANT HISTORY**

4.1 Application site

Appeal references (Full appeal decision is attached as **Appendix A** to the agenda report):

APP/C1760/C/19/3221142 (Appeal A) – Appeal against enforcement notice seeking to remedy the material change of use of the land from agricultural use to open storage use (B8).

APP/C1760/C/19/3221144 (Appeal B) – Appeal against enforcement notice seeking to remedy the creation of a bund, hard standing and the erection of fencing.

APP/C1760/C/19/3220890 (Appeal C) – Appeal against the refusal of planning application reference 18/01039/FULLS (paragraph 4.2), which sought planning permission for the development proposed is change of use of land to open storage (Class B8).

All Appeals A, B and C were dismissed on 11th October 2019. In dismissing the appeals, the Planning Inspector expressed the following rationale:

Impact on the character and appearance of the area (change of use)

10. The adjoining Wynford Industrial Park is set at a considerably lower level, which reduces its prominence within the wider landscape. The change of use has however resulted in a significant incursion by means of the subdivision of the previously restored site. The site concerned represents a large area which, given its alien rectangular form, is poorly related to other landscape features of the immediate locality.

11. *Furthermore, given its elevated position, owing to the surrounding domed topography, the storage of caravans as well as the significant quantum of other items stored at the site would be conspicuous, and the site can be seen from the road. The site cannot be seen in significantly wider views, but rather it is the immediate and localised views of the site which presents an open storage use as one that is visually intrusive.*
12. *Whilst I acknowledge that some landscaping has been undertaken in the form of tree planting, further landscaping measures or other features, that could be controlled by planning conditions, would in my view only serve to emphasise the subdivision and open storage use. Similarly, planning conditions restricting the height of stored items would not ameliorate the harm given its already elevated position. For the reasons set out in Appeal B below, the bunds and fencing would not provide a satisfactory form of mitigation that would overcome my concerns.*
13. *I conclude that the change of use is harmful to the character and appearance of the area and so conflicts with Policy E2 of the Test Valley Borough Revised Local Plan DPD 2011-2029, January 2016 (the RLP). This policy, amongst other things, requires development to not have a detrimental impact on the appearance of the immediate area and the landscape character of the area within which it is located; and, the existing and proposed landscaping and landscape features enable it to positively integrate into the landscape character of the area. For the same reasons, it fails to accord with the achieving well designed places objectives of the National Planning Policy Framework.*

Impact on the character and appearance of the area (fencing and bunds)

20. *The site now consists of substantial earth bunds around the perimeter of the area where the open storage use is taking place. The entirety of the area within has been set to a hardstanding, consisting of compressed scalplings.*
21. *I accept that the previous landform of the site, and indeed that which remains around it, is a man-made feature. Its general appearance was however not conspicuous within its countryside location.*
22. *The bunding can be seen in views from the road, despite the screening provided by the roadside hedgerow. The bunding is clearly not a natural feature in the local countryside and is more conspicuous, owing to its elevated location, length and height, than others that adjoin the Wynford Industrial Park, including the caravan storage area to the west.*
23. *I am therefore not persuaded on the evidence before me that an elevated area of hardstanding, extending to some 1.6ha, with continuous bunding of approximately 3m in height around the perimeter, as well as numerous fences, reflects the landscape character of the area within which it is located. It is in my view visually intrusive and fails to positively integrate with the landscape character of the area given the size of the site, its*

elevated positioning and conspicuous rectangular form. I therefore do not accept that the developments contribute to protecting the natural environment by protecting the local landscape.

- 24. I conclude that the bunds, fencing and hardstanding are harmful to the character and appearance of the area and so conflict with Policy E2 of the RLP. For the same reasons, it fails to accord with the achieving well designed places objectives of the National Planning Policy Framework.*

Whether open storage is an appropriate use in the countryside

- 15. To this effect both parties have drawn my attention to Policy LE17 of the RLP, which relates to employment sites in the countryside. This consists of three criteria, all of which must be satisfied. The storage use is however not contained within the lawful employment site, the Wynford Industrial Park, as it extends the boundary into the countryside. The supporting text to this policy however then explains that developments which 'involve the extension of the site boundary into the countryside would be considered on their individual merits. Open storage will only be permitted if it is not visually intrusive.' However, I have already found the change of use is visually intrusive such that it is harmful to the character and appearance of the area.*
- 16. Accordingly, I conclude that the open storage use is not appropriate to its countryside location and therefore conflicts with Policies COM2 and LE17 of the RLP. These policies, amongst other things, identify a settlement hierarchy and only permit development that is appropriate in the countryside and in the case of open storage, not visually intrusive.*

Conclusion

- 33. I have found the change of use and operational developments visually intrusive such that they are harmful to the character and appearance of the area. The open storage use is consequently not appropriate to its countryside location. Whilst water management concerns could be addressed by suitably worded planning conditions and the use may assist in meeting some local community need in respect of storage, as well as economic objectives, this does not outweigh the harm I have identified.*

- 4.2 **18/01039/FULLS** - Change use of land to open storage with hardstanding, bunds and landscaping. Application refused on the 8th August 2018 for the following reasons:

- 1. The proposal is for a change of use to open storage and distribution which is considered neither appropriate nor essential development in the countryside and thereby contrary to Test Valley Borough Revised Local Plan 2016 policy COM2.*

2. *The proposed development and landscape mitigation would add an alien regular rectangular raised land form, enclosing the 1.6ha site within the existing larger rectangular agricultural field, which would in itself be considered an alien land form in the immediate area visually intrusive in the landscape. The proposal is thereby contrary to RLP policies COM2 a), LE17, E2 a) and c) and Paragraph 127 of the NPPF 2018.*
3. *The application proposes a compressed hard surface to the 1.6ha site surrounded by a landscaped earth bund, without supplying detailed water management information to provide required surface water and sustainable drainage details. In the absence of evidence to the contrary, it is considered that the application fails to demonstrate compliance with required water management standards or guidance, and is therefore considered contrary to RLP policies COM2 and E7.*

4.3 Adjacent parcel of land to the north-west

15/02276/FULLS - Change use of vacant land to external storage in association with adjoining employment site. *Permission subject to conditions, decision issued on 23.02.2017.*

5.0 **CONSULTATIONS**

5.1 **Ecology** – No objection subject to conditions.

5.2 **Environment Agency** – No objection subject to condition.

5.3 **Environmental Protection** – No objection subject to conditions.

5.4 **Highways** – No objection.

5.5 **Landscape** – No objection subject to conditions.

5.6 **Local Lead Flood Authority** – No objection subject to conditions.

5.7 **Planning Policy** – Comment.

- The additional marketing information is acknowledged as a material consideration
- Achieving sustainable development means that the planning system has 3 overarching objectives, which are interdependent and need to be pursued in mutually supportive ways so that opportunities can be taken to secure net gains across each of the different objectives
- While the economic objective is one of the three its benefits should not outweigh the potential harm to the social and environmental objectives
- E5: Biodiversity – It is recommended that the findings of the amended Ecological Impact Assessment is referred to the Ecologist for comment in relation to the potential to enhance biodiversity on site

5.8 **Trees** – No objection.

- 6.0 **REPRESENTATIONS** Expired 11.03.2021
6.1 **Romsey Extra Parish Council** – Objection.

Previous comments remains:

1. It is a departure from the Local Plan
2. It is unusually intrusive in the countryside
3. There is insufficient detail in the Drainage Strategy for comment

- 6.2 **Planning Committee of the Romsey and District Society** – Objection (summarised).

Principle of development

- The lack of adequate screening, elevation of the site and the resultant visual impact are all factors contributing to the view that there is no particular justification for the storage use on this site in the countryside
- The storage use at the application site would only adversely add to the existing numerous adjacent industrial and storage activities and be even more visually intrusive than some of those existing uses

Impact on the character and appearance of the area

- As the site is elevated from its surrounding area of open countryside, the visual harm resulting from the storage of caravans, motor homes and containers would result in an undue visual impact
- The inclusion of the proposed landscaping is not considered to be adequate to eliminate the resulting visual impact as the planting would take years to contribute as a full screen from the public highway

Water Management

- Committee understands the LLFA has concerns regarding the details of the proposed surface water drainage
- The applicant has submitted insufficient information to prove that the application site has a secure outfall to dispose of surface water

- 6.3 **14 letters from residents** – Objection (summarised).

Planning History

- A similar proposal was rejected by Test Valley Borough council in 2018, this then went to the Secretary of State in October 2019 under appeal
- The appeal was dismissed and planning permission refused again
- Do not consider that there are any considerable changes between the current proposal and the previously refused application, urge TVBC to refuse the application again
- Proposed changes will take years to take effect, proposal in essence the previous application which was rejected
- Shocking and unacceptable that the development has already been built
- Previous planning permissions have been issued with restrictions but these have been ignored

Principle of development

- Industrial estate has grown over the years and areas have evolved without planning consent
- Further expansion and of the will encroach onto countryside land
- Proposal will lead to the land becoming an industrial estate before long
- The proposal does not comply with any of the criteria of Policy LE17
- Concern that should planning permission be granted, area moves from designated countryside to an area that can easily be developed at a later stage for additional units

Impact on the character and appearance of the area

- Planning Inspector previously found the proposal harmful to the character and appearance of the area
- Proposal will be clearly visible to all, located 100m from Cupernham Lane and proposed planting will not screen industrial appearance for a while to come
- Application site is on elevated ground and the resulting visual impact of the storage area will have a prolonged negative effect on the outskirts of Romsey
- Proposed planting will not screen industrial appearance during winter
- The proposed mitigation by planting has weaknesses – bunds are unnatural land forms and trees will provide poor sight screens
- Current scheme will further deteriorate the northerly aspect from Belbins
- Overdevelopment, design
- Proposal conflicts with Policy E2 of the TVBRLP
- Proposal will double land area, concern that it will become an expansion of the existing industrial units in years to come
- Proposed use will eventually spread to other uses and end up like the eyesore at the start of Belbins opposite the entrance to Cupernham Lane

Impact on the general amenity of the area

- Proposal will damage nature additional car and noise pollution
- Additional smell impact, adverse impact on air quality
- Proposed tree planting would result in a risk of the clay capping of the site being breached by root growth and the release of potentially dangerous methane emissions
- Request that the EA does a full risk assessment of the potential for root growth to penetrate the protective capping in relation to Wynford Cottage

Impact on the amenity of residential property

- Overlooking, loss of privacy
- Scale and Bulk results in loss of light
- Neighbours opposite the entrance to the site are disturbed late at night and early in the morning with constant vehicle movements
- The estate does not sit comfortably with the residential area and should not be allowed to grow any further
- Site has evolved to a 24/7 365 day operation ignoring previous restrictions on operating hours

Ecology

- Proposal will have a detrimental impact on nature and habitat and wildlife conservation of the surrounding area
- Area to the west of Belbins should be designated a conservation area to be consistent with the nature reserve and SSSI along the canal
- Further enhancement of the built up area will only be detrimental to the countryside environment

Water Management

- Questionable siting of a hard surface on elevated terrain, underlain by impermeable clay capping
- Surrounding private residences would face uncertainty that extreme weather conditions create problems to their safety based on run-off, saturated soil profiles and elevated water table levels
- The EA and LLFA have raised concerns about the adequacy of the mitigation
- Request a full risk assessment is undertaken for the potential of basin infiltration failure to penetrate the protective capping in relation to Wynford Cottage

Highways

- Concerns regarding a potential increase in traffic and concerns regarding road safety
- Road infrastructure cannot cope with the increase in traffic from the previous extensive development in the Romsey area, existing problems from lorries in and out of this road
- Illegal vehicles are stored in lay-bys for weeks on end causing real hazards for residents trying to exit their drives
- Any additional increase in large vehicle movements around the entrance to the Industrial Estate will result in a road safety risk to other highway users
- Current traffic tends to ignore the 30mph speed limit, particularly heavy and light goods vehicles
- Concerned about future change of use and the resulting impact on traffic and road safety risk arising from vehicles accessing the industrial estate
- Some enterprises use the parking spaces at Belbins as storage overspill, proposal will exacerbate this

Community Safety

- Encountered young people shielding behind the overspill vehicles in evenings, an issue of community safety

Other Matters

- Proposal will have a detrimental impact on property values

7.0 **POLICY**

7.1 Government Guidance

National Planning Policy Framework (NPPF)

National Planning Practice Guidance (NPPG)

7.2 Test Valley Borough Revised Local Plan (2016) (TVBRLP)

Policy SD1: Presumption in Favour of Sustainable Development

Policy COM2: Settlement Hierarchy

Policy E1: High Quality Development in the Borough

Policy E2: Protect, Conserve and Enhance the Landscape Character of the Borough

Policy E5: Biodiversity

Policy E7: Water Management

Policy E8: Pollution

Policy LHW4: Amenity

Policy T1: Managing Movement

Policy T2: Parking Standards

Policy CS1: Community Safety

8.0 **PLANNING CONSIDERATIONS**

8.1 The main planning considerations are:

- Planning History
- Principle of development
- Impact on the character and appearance of the area
- Impact on the general amenity of the area
- Impact on the amenity of residential property
- Ecology
- Water Management
- Highways
- Other Matters

8.2 **Planning History**

Paragraph 4.1 sets out the Inspectors rationale in dismissing the previous planning application reference 18/01039/FULLS and the associated enforcement appeals. It is acknowledged that the current application comprises the same area of hardstanding, security fencing and landscape bunding as the previously dismissed appeals. However, the current application diverges from the previously dismissed application in the following ways:

- Additional supporting analysis of open storage facilities in the locality
- Additional surface water drainage information
- Additional significant areas of proposed woodland planting to the north, east and south of the open storage area

8.3 Consequently, it is considered there is a sufficient amount of differences between the current application and the previously dismissed scheme to enable its progression to assessment and determination by the Local Planning Authority. The planning history is however acknowledged to be a significant material consideration in the assessment undertaken.

8.4 Principle of development

Local Plan

Policy COM2

The application site is located on land outside of a settlement boundary and therefore is designated as countryside by Policy COM2 of the TVBRLP. Policy COM2 of the TVBRLP states that development outside the boundaries of settlements will only be permitted if:

- a) *It is appropriate in the countryside as set out in the RLP Policy COM8 – COM14, LE10, LE16 – LE18; or*
- b) *It is essential for the proposal to be located in the countryside*

8.5 Although Policy LE17 (Employment Sites in the Countryside) provides for open storage, the criteria of this policy require open storage areas to be located within the parameters of the lawful employment site. In this instance, the storage area has been implemented on land previously laid to grass as an open field and therefore is outside the extent of the lawful employment site. As Policy LE17 is not engaged then none of the policy exceptions listed under criterion (a) of Policy COM2 are applicable and the proposal falls to be considered on its own merits.

8.6 It is not considered that an open storage use is essential to be located on countryside land and therefore, the proposal does not comply with criterion (b) of Policy COM2.

8.7 As a result, the application is contrary to Policy COM2 and the development framework of the TVBRLP.

8.8 *Strategic TVBRLP allocations*

Paragraph 15 of the NPPF sets out the need for the planning system to be planned and therefore, it is necessary to assess whether there are any current strategic policies within the TVBRLP which would potentially serve to accommodate any demand for open storage.

8.9 Table 8 on page 85 of the TVBRLP sets out the employment requirement for Southern Test Valley, with an identified requirement of 34,000sqm falling within a B8 use over the plan period. However, this is specified as B8 warehouse use to reflect the strategic employment objectives of the Local Plan and therefore does not cover open storage use, which is traditionally a low employment generator.

8.10 In addition, Policy LE10 of the TVBRLP (Strategic Employment Sites) seeks to ensure that land located within existing industrial sites such as Abbey Park, Budds Lane and Romsey Industrial Estate on Greatbridge Road remain in employment use to ensure that the strategic existing employment sites are retained for this purpose. Consequently, the location of an open storage use within existing industrial estates would not meet the strategic objective of the TVBRLP to retain existing employment sites.

- 8.11 There are no other policies within the TVBRLP that seek to deliver open storage sites and therefore, it is unlikely that this type of facility will be delivered through the strategic allocations and policies of the TVBRLP. As a result, the appropriateness of the application site to serve this purpose falls to be considered on its own merits with regard to national planning policy and other relevant local planning policies. Therefore, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), an assessment is required to whether there are any material considerations to outweigh the development plan conflict.
- 8.12 Other material considerations
In assessing the previously dismissed appeal, the Inspector concluded that the open storage area was not a use appropriate to the countryside due to resulting visual harm on the wider landscape. However, for the rationale set out below, it is considered that the proposed woodland planting included as part of the current application would serve to effectively screen the storage area from any public vantage points, thereby ensuring that there is no resulting visual harm upon the wider landscape.
- 8.13 Consequently, it is necessary to assess whether the storage area is an appropriate use of countryside land when there is no associated visual detriment on the wider landscape. This assessment is undertaken below based on the submitted evidence listed in paragraph 3.3 and the particular circumstances of the application.
- 8.14 *Need for the open storage area*
In support of the proposal, an open storage assessment has been submitted by the applicant's agent identifying a series of competing storage sites within the locality. Of particular proximity are the premises at Castle Lane Farm, North Baddesley and the previous storage facility located at the Former North Hill Sawmill Yard, Flexford Road.
- 8.15 In relation to the premises at Castle Lane Farm it is noted a separate planning application has recently been submitted for the change of use of land to caravans, boats and container storage for up to 110 bays under application reference 21/00795/FULLS. This application is undetermined at the point this report was written.
- 8.16 With regard to the previous storage facility located at the Former North Hill Sawmill Yard on Flexford Road, the partial use of this land for similar storage items was acknowledged through the issuing of a lawful development certificate under application reference number 16/01889/CLES. However, this land has subsequently been subject to permission for redevelopment as a Care Village under application reference 17/01615/OUTS. Consequently, at the time of writing, this land is no longer in use as storage but has been cleared in preparation for the commencement of the first phase of residential development.

- 8.17 It is however noted that the submitted open storage assessment identifies other storage locations positioned further away outside the Borough boundary and as such, there is the potential for any shortfall in storage demand to be met by the existing sites at Alresford, Christchurch, Lymington and Southampton. It is also necessary to understand whether any local shortfall could be accommodated on the existing storage site at Wynford, permitted under application reference 15/02276/FULLS (paragraph 4.3).
- 8.18 In response to this query, the applicant submitted additional information regarding the current waiting list for use of the current premises, including data on where previous customers of the business resided when the application site was previously occupied. This submitted detail indicates that there has been an expression of interest from approximately 300 people over the last two to three years. With regard to the location of this demand, the submitted data indicates that 49% comprises people currently residing in Romsey and Chandlers Ford, with an additional 28% currently residing in Southampton and Totton.
- 8.19 Although indicative, it is considered that the site specific data provided in conjunction with the submitted open storage assessment outlines a local demand for open storage facilities. This arises in part from the redevelopment of the previous facility at the Former North Hill Sawmill Yard site and the absence of any new or expansion of existing storages sites in the local area. Further supplementing the identification of a shortfall in supply are the submitted letters of support listed in paragraph 3.3 and in particular, the letter from the Caravan Storage Site Owners Association.
- 8.20 Following the assessment above it is considered that there are particular local conditions that in this instance, serve as evidence of a demand for open storage space. However, it is necessary to assess whether the application site is an appropriate location to provide additional open storage against the framework of the NPPF.
- 8.21 *Sustainable Development*
The National Planning Policy Framework (NPPF) is a material consideration in the assessment of planning applications. The NPPF identifies the three dimensions of sustainable development which should be taken into account; social, economic and environmental roles (paragraph 8). Paragraph 7 states that the purpose of the planning system is to contribute to the achievement of sustainable development.
- 8.22 *Environmental benefits*
The development undertaken is sited on an area of landfill which previously was laid and left as tall grassland, forming part of a network of open fields that comprises the wider application site. It is acknowledged that the incursion onto this grassland and replacement with security fencing, gravel surface and the enclosing landscape bund will have been to the detriment of the wider environment.

- 8.23 However, the proposed woodland planting will extend to an area covering approximately 0.75ha on the eastern boundary of the application site with a further woodland areas proposed to the north (0.15ha) and south (0.25ha). Further areas are proposed to be maintained as woodland edge comprising shrubs and coppiced material. The proposed woodlands will be positioned within wider areas of retained grassland serving as a habitat for reptiles. Consequently, given the scale of planting proposed and the resulting enhancement to the landscape character of the area in addition to biodiversity, it is considered that the proposal will result in an overall benefit to the wider environment. Whilst the additional planting could be achieved in absence of the development undertaken, it is unlikely that the scale of the planting and measures proposed would be implemented in the absence of the storage site, given its dual purpose as intervening screen from the adjoining public footpaths and highways. It is also clear that the applicant is only proposing such landscaping area to mitigate the impact of the development on the public domain – something that was missing from the dismissed appeals and was so critical to the outcome of that decision.
- 8.24 With regard to the accessibility of the application site, it is located adjacent to the existing industrial estate. As a result, the distance between the proposed storage space and the neighbouring settlements such as Romsey is an equivalent distance to the existing open storage site permitted under application reference 15/02276/FULLS (paragraph 4.3). It is also noted that the application site utilises the existing internal vehicular access arrangements and therefore, vehicular trips would travel through the existing wider industrial estate rather than relying on countryside roads or extended journeys across countryside land. It is therefore not considered that the proposal will introduce an over reliance on the private car beyond that which already exists for the neighbouring industrial and storage uses.
- 8.25 *Economic benefits*
The expansion of the existing storage site will serve to support and enhance a rural business in the countryside and the creation of the proposed woodland areas will generate an economic benefit arising from the employment of professionals during the implementation stage. There is no evidence of what that level of investment might arise and as such the development will generate only a limited economic benefit and moderate weight is afforded to this general benefit. .
- 8.26 *Social Benefits*
The submitted data indicates that the proposal would predominantly serve a demand for open storage which arises from local residents. Therefore, the provision of an additional open storage facility would support those within the local community undertaking caravan, motorhome or boat based holidays and other social excursions through enabling their storage within the locality. Additional container storage space would also serve to expand on existing storage facilities within the local area adding competition into this sector locally. It is therefore considered that the development will result in a limited social benefit to local communities, through indirectly supporting holiday and excursion based activities and moderate weight is afforded to this general benefit.

8.27 *Previous appeal decision*

In dismissing the previous appeals set out in paragraph 4.1, the Planning Inspector considered the matter of whether open storage is an appropriate use of the application site as countryside land. As demonstrated by the commentary at paragraphs 15 and 16 (reproduced in paragraph 4.1 above), the Inspector concludes that as the storage use would be visible from the public realm and that its appearance would detract from the landscape character of the area, then the proposed use would be unacceptable.

8.28 It is considered therefore, that the basis of the Inspector's conclusion on the appropriateness of a storage use on countryside land was led by its visual impact rather than a general point of principle that such uses are always inappropriate in countryside locations. This is associated with the 'harm' that arises from development proposals to the resultant form, function and appreciation on the delineated countryside. Consequently, an assessment of the potential resulting visual impact of the development needs to be undertaken to inform the overall planning balance and a detailed visual assessment is set out at paragraph 8.30 through to 8.37. However, unless the current proposal is identical to the previously dismissed appeal with no change in circumstance arising in the interim period the planning history in itself does not serve to determine that the proposed use of the application site is inappropriate.

8.29 Conclusion on the principle of development

Although a conflict with Policy COM2 and the development framework of the TVBRLP has been identified, the submitted evidence and other available information demonstrates that there has been a recent loss of a storage site within the local vicinity. The proposal would serve to respond to this recent loss, with no alternative sites identified through the strategic policies and allocations of the TVBRLP. The applicant has also shown that there is an unmet demand for open storage locally through an assessment of their customers. In addition the proposal would deliver limited environmental, social and economic benefits and the status of application site as historic landfill, its partial function as open storage enclosed by the proposed mature woodland would not undermine the objective of Policy COM2 in seeking to protect countryside land. As a result it is considered that the principle of development is acceptable, subject to compliance with the other relevant policies of the TVBRLP.

8.30 **Impact on the character and appearance of the area**

The main public vantage points of the application site are provided by the public highway located to the south, Yokesford Hill/Belbins, in addition to views at various points along the public footpath to the east, Romsey Extra no.11. In both cases, there is a significant intervening distance between the application site and public viewpoints, with an approximately minimum distance of 125m to the public highway and 160m to the public footpath.

8.31 However, due to the elevated ground level of the application site and the breaks present in the intervening mature trees and vegetation, views of items such as caravans and motorhomes are possible when the storage site is in use, especially during winter months. It is noted that the Inspector previously found these views harmful to the wider landscape, particularly those available from the

public highway to the south. Although the existing landscape bund which encloses the area of hardstanding serve to partially screen views, it was considered to result in the appearance of an uncharacteristic landscape feature which served to emphasis the alien rectangular form of the application site and thereby, emphasising the visual harm upon the wider landscape.

- 8.32 In response to the conclusion of the Inspector, the current application site proposes the planting of woodland areas to the north, east and south of the existing hardstanding area. In support of the proposed landscaping, a landscape character and visual appraisal was submitted (Deacon Design, November 2020). The submitted landscape information identifies that woodlands of a native species are characteristic of the area (located within TVBC Landscape Character Area (LCA) 4B Michelmersh) and therefore, will avoid the uncharacteristic and alien visual appearance of the existing landscape bund.
- 8.33 In terms of placement, the proposed woodlands will serve to provide a strong visual screen from those views currently available from the public footpath and highway with the substantial depth of the proposed tree belts limiting any opportunity to obtain views into application site even during winter months. In addition, the location of the proposed woodlands will be viewed in association with the existing woodland areas to the east of the application site and will provide a continuous verdant setting to the adjoining public footpath.
- 8.34 Consequently, it is considered that the proposed woodland planting will be a more effective visual screen than the existing landscape bund and furthermore, will be characteristic of the existing wider landscape area. Given the development undertaken and in response to the concerns raised by the third party representations with regard to the effectiveness of planting during the establishment period, it is necessary to secure the implementation of semi-mature planting where possible.
- 8.35 Therefore, although the currently submitted information regarding the proposed density and species mix is noted, it is considered necessary to secure further detail including the typical heights of the trees when first planted, precise implementation schedule and an agreement on the mechanism to secure the retention of the proposed woodland planting in perpetuity unless otherwise agreed in writing by the Local Planning Authority. Consequently, the officer recommendation is subject to the receipt of this detail and the imposition of a suitable mechanism to secure the retention of the woodland.
- 8.36 As well as providing an effective landscape belt to screen views from the public realm, the proposed woodland planting will also serve to enclose the application site and prevent any future opportunity for expansion thereby addressing concerns raised by third parties with respect to potential future development.
- 8.37 It is acknowledged that without the form, location and extent of the detailed landscaping specification as proposed that the current application would be identical to that presented at appeal. Significant weight is afforded to the proposed landscaping and the management regime to be employed in reaching the conclusion that the development undertaken will be screened from the

public realm, and that the proposal will provide an overall enhancement to the wider landscape character of the area. Consequently, the application is in accordance with Policy E2 of the TVBRLP.

8.38 Design

With regard to the existing hardstanding, security fencing and landscape bund, given the proposed woodland planting, it is considered that these elements of the proposal will only be visible by those accessing the application site directly and viewed in context with the existing wider industrial estate. It is therefore considered that the design will avoid any visual detriment to the existing street scene and as a result, the application is in accordance with Policy E1 of the TVBRLP.

8.39 **Impact on the general amenity of the area**

Noise

Third party representations have raised concern that the proposed storage use will result in an unacceptable noise impact on the general amenity of the area and residential property, with particular reference to noise generation from vehicle movements at unsociable hours.

8.40 In response to these concerns, controls are proposed to limit the hours of operation for the proposed storage area, including a restriction on the internal movement of storage items and use of heavy machinery outside of normal working hours. Consequently, any activity during unsociable hours will be limited solely to drop-off and collection of storage items with the associated traffic movements representing a modest increase on the number of trips generated by the neighbouring industrial estate.

8.41 Given the imposition of the limitations set out above and in conjunction with the intervening distance between the application site and any neighbouring properties, it is not considered that there will be any materially significant level of noise disturbance on the general amenity of the area.

8.42 Contamination

Although development has already been undertaken to install the hardstanding, security fencing and landscape bund, there is potential for the proposed drainage strategy to result in contamination of controlled waters due to the partial composition of the application site as historic landfill.

8.43 Consequently, it is considered necessary to secure the submission of a preliminary risk assessment, including onsite investigation and method statement to ensure the prevention of any pollution of controlled waters. Furthermore, a condition has been added to secure a remediation strategy in the event that any previously unidentified contaminative material is discovered during the implementation phase.

8.44 With these controls secured, it is considered that the proposal will avoid any contamination of controlled waters or serve to generate a materially significant level of pollution upon the general amenity of the area. As a result, the application is in accordance with Policy E8 of the TVBRLP.

8.45 Given that a risk assessment for the whole of the application site has been secured, it is not considered necessary for a specific risk assessment in relation to Wynford Cottage to be provided. In relation to the potential risk arising the penetration of the clay capping over the historic landfill from tree roots of the proposed planting, the specification of the species to be planted has been identified in accordance with the Forestry Research Restoration guidance for landfill sites which examined the appropriateness of planting species on this type of land. Therefore, it is not considered that there will be any material contamination risk from this element of the proposal.

8.46 Impact on the amenity of residential property

Privacy

The closest neighbouring properties to the south of the application site are Abbots Barn located approximately 65m away to the south-west and Wynford Cottage, positioned approximately 100m away to the south-east. Although it is acknowledged that the application site is on elevated ground from these residential properties, given the intervening distance it is not considered that the development will result in any adverse overlooking opportunity. In addition, the proposed woodland planting in conjunction with the existing bund will also serve to enhance the screening provided by the existing vegetation. Similarly, with regard to the residential properties located to the east and north-west of the application site, it is considered that the intervening distance in conjunction with the vegetation screening will prevent any materially significant adverse privacy impact.

8.47 Daylight/Sunlight Provision

Due to the intervening distance between the application site and the residential properties in conjunction with the modest scale of the development undertaken, it is not considered that there is any materially significant reduction in daylight or sunlight provision for neighbouring dwellings. As a result, the application is in accordance with Policy LHW4 of the TVBRLP.

8.48 Ecology

The application is supported by an Ecological Impact Assessment (Ecosa, January 2021) which provides an updated assessment of the application site conditions, following the previous Preliminary Ecological Assessment (Ecosa, 2018) submitted under application reference 18/01039/FULLS.

8.49 The Preliminary Ecological Assessment identified that the existing hardstanding served to replace a species poor area of semi-improved grassland habitats, with the installation of a grassland bund on the boundary of the storage area serving to increase the connectivity of terrestrial habitat for Great Crested Newts. Therefore, it is considered that the development undertaken has not resulted in any materially significant adverse impact on protected species or habitats.

8.50 The proposed woodland planting will comprise native species and serve to provide additional habitat areas for protected species such as bats, Hazel dormouse and birds. However, it is important that the current value of the existing grassland to reptiles, in particular Great Crested Newts is retained to ensure that the proposal adversely impact this protected species.

- 8.51 Therefore, in order to offset the loss of the existing grassland areas replaced by woodland the submitted ecological assessment proposes the retention of a grassland corridor on the eastern boundary of the application site. This will be supplemented with the installation of species specific habitats such as hibernacula and brash piles created from the woodland cuttings. In addition, the edges of the proposed woodlands will be managed to ensure that these areas provide value to reptiles such as Great Crested Newts. Consequently, it is considered that the proposed mitigation measures will ensure the proposed woodland planting does not result in the loss of habitat for Great Crested Newts or other reptiles.
- 8.52 To ensure that the proposed biodiversity enhancements and mitigation measures are achieved, a condition has been added to secure implementation in accordance with the submitted ecological assessment. In addition, a condition has been added to ensure the submission of specification details for external lighting prior to installation onsite, to safeguard against any adverse impact on bats. The aforementioned legal agreement requiring the submission of a long-term management plan for the proposed woodland areas will also serve to ensure that the enhancement of biodiversity is maintained in the long term.
- 8.53 As a result, it is considered that the proposal will avoid any adverse impact on protected species and habitats in accordance with Policy E5 of the TVBRLP. Comments have been received regarding the designation of the application site as part of a wider ecological conservation area but given the implementation of the measures outlined above, such a designation would not be reasonable or necessary to ensure the enhancement of biodiversity.
- 8.54 **Water Management**
In support of the application, a Flood Risk Assessment (Civil Engineering Practice, November 2020) was submitted identifying the current conditions at the application site and the potential for any adverse flood risk. The submitted assessment identifies that the development undertaken has resulted in the creation of a large area of hardstanding and the geology of the application site predominantly comprises clayey fine sand and sand clay.
- 8.55 In response to these conditions and to ensure that the development does not result in a materially significant increase in surface water run-off flood risk, two infiltration basins are proposed to be installed onsite. The infiltration basins will be located to the north and south of the existing hardstanding and serve to collect any surface water run-off generated by the development undertaken. To supplement the proposed drainage strategy and in response to initial concerns raised by the Local Lead Flood Authority (LLFA) additional data was submitted, demonstrating that there will be a minimum of 1.2m depth between the bottom of the proposed infiltration basins and the highest recorded level of groundwater onsite. The request for by the LLFA for an assessment against the highest recorded level of groundwater ensures that the potential impact following extreme weather conditions are accounted for.

- 8.56 Following the receipt of the requested additional groundwater assessment, the LLFA resolved to remove their original objection and consequently, it is considered that the proposed drainage strategy is sufficient to mitigate against any potential increase risk of surface water flooding. To ensure that the proposed drainage strategy is successfully implemented and operational in the long term, conditions have been added to secure installation in accordance with the approved details and the submission of a management plan.
- 8.57 With regard to other potential types of flooding, the application site is located within Flood Zone 1 and therefore it is not considered that the development will result in an adverse flood risk arising from either fluvial or tidal water.
- 8.58 As discussed in the preceding section on general amenity above, condition 9 on the Officer recommendation secures the submission of a risk assessment and method statement demonstrating how the proposed drainage system will be installed without comprising the current landfill capping and containment measures. With this detail secured, it is considered that the development will not adversely impact water quality or compromise strategy water resources. A third party representation has been received requesting that a specific Flood Risk Assessment is submitted in relation to Wynford Cottage and the potential contaminated failure of the proposed infiltration basins. However, given the imposition of a condition securing a risk assessment on potential groundwater pollution for the application site as a whole, it is not considered reasonable or necessary for a specific risk assessment in relation to Wynford Cottage to be provided.
- 8.59 Following the assessment above, it is considered that the proposal includes sufficient measures to avoid any adverse impact on water quality or flooding. Therefore, the application is in accordance with Policy E7 of the TVBRLP.

8.60 **Highways**
Access

In support of the proposal and in response to the request by the Highways Officer, a Transport Statement was submitted (Paul Basham Associates, February 2021) identifying the potential impact of the proposal on the highway safety of the local road network. This submitted assessment noted that the application site will be served an existing internal access track and vehicular access point leading onto Yokesford Hill, currently in use for the operation of the adjoining storage and industrial unit premises.

- 8.61 Based on data collected from the existing premises, the submitted Transport Statement identified a total anticipated trip generation of 50 vehicle movements per day during the high season period (Easter and July/August), with trips likely to be reduced during other times of the year. Vehicle movements associated with operation of the open storage use were identified as unlikely to occur during traditional peak traffic periods as the storage items/vehicles were generally associated with holidays rather work or school trips.

- 8.62 With regard to the current highway safety of the local road network, only one accident had been recorded within the last 5 years at the neighbouring junction to the west. Therefore, it was assessed that the highway safety of the local road network had not been undermined by the vehicular traffic associated with the neighbouring uses.
- 8.63 Consequently, in acknowledgement of the existing vehicular access arrangements that the development will utilise and in conjunction with the submitted detail regarding the anticipated trip generation associated with the proposed use, it is considered that the proposal can be safely accommodated by the local road network. The acceptability of the proposed use in highway safety terms is reliant on the data provided in the submitted Transport Statement which only covers trip generation relating to the storage of motor homes, caravans, trailers, boats and containers. Therefore, forms part of the reasoning for the imposition of condition 3, which limits the use to storage of these items only.
- 8.64 The concerns raised by third party representations regarding highway safety are noted but given the submitted information and the analysis undertaken above, it is considered that the proposal will avoid any adverse harm and therefore, the application is in accordance with Policy T1 of the TVBRLP.
- 8.65 References have been made within the third party representations to the illegal parking of vehicles in laybys and the exceeding of the local speed limit by LGV's as well HGV's, but these issues are private, civil matters and not material to the assessment of the planning application.
- 8.66 Parking
Given that the proposed open storage use will be limited in nature to the pick up or collection of vehicles or items stored onsite (condition 3), it is considered that the development does not trigger the requirement for any additional parking capacity. Although Annexe G of the TVBRLP sets out a standard for B8 storage uses, this is in relation to B8 Warehouse uses and therefore, is not applicable in this instance. Consequently, the application is in accordance with Policy T2 of the TVBRLP.
- 8.67 **Crime and Community Safety**
It is noted that concerns have been raised with regard to the potential for the proposal to adversely impact the safety of the community, with reference to past observations in connection with parked vehicles. However, as the development comprises the extension of a privately operated storage area adjacent to, and accessed from, the existing industrial estate, it is not considered that the layout or type of development proposed will serve to increase crime or undermine community safety in a materially significant manner. Consequently, the application is in accordance with Policy CS1 of the TVBRLP.
- 8.68 **Other Matters**
A third party representation has raised concern that the development will serve to reduce property prices but the impact on the value of private property is not a material consideration and therefore, has not formed part of the assessment of the planning application.

9.0 **CONCLUSION**

- 9.1 The application site is located within land designated as countryside by Policy COM2 and none of the policy exceptions listed under criterion (a) apply to the proposed storage use. In addition, it is not considered essential for the development to be located on countryside land and therefore, the proposal does not comply with criterion (b). Consequently, the application is contrary to the development framework of the TVBRLP.
- 9.2 However, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act (2004), an assessment against the other material considerations has been undertaken.
- 9.3 In this instance, evidence has been submitted demonstrating that there is a local demand for additional open storage space and additional provision of this type of storage is not addressed by the strategic policies of the TVBRLP. The use of the application site for open storage would therefore respond to this local demand. In addition, the position of the application site adjacent to the existing wider industrial estate on a landfill site will avoid an isolated location and not serve to undermine the strategic objective of Policy COM2, which seeks to protect countryside land.
- 9.4 The proposal includes additional woodland planting that will serve to both screen the development from any public view and also serve to enhance onsite biodiversity. It is therefore considered that the proposal will result in a modest environmental benefit. This additional landscaping area is significant in that it would enable the proposed site to be appropriately screened over time, and it also distinguishes the current proposal from that which was considered at appeal.
- 9.5 In addition, the proposed storage use will serve to support an existing business in the countryside and provide the local community with an increased opportunity to store motorhomes, caravans and boats which are utilised for holidays. It is therefore considered that the proposal will result in a limited economic and social benefit.
- 9.6 No other conflict with the policies of the TVBRLP has been identified and it is not considered that the proposal will result in any other material harm.
- 9.7 In the overall planning balance, it is therefore considered that the environmental, economic and social benefits of the proposal outweigh the technical breach of Policy COM2 and the development framework of the TVBRLP.
- 9.8 As a result, permission is recommended. This recommendation is subject to the receipt of the final specification, implementation and on-going management schedule of the proposed woodland planting in addition to an agreement on the mechanism to secure the retention of the proposed woodland planting in perpetuity.

10.0 RECOMMENDATION

Delegate to the Head of Planning and Building for the following:

- Secure the final specification, implementation and maintenance schedule of the proposed woodland planting
- Secure the retention of the proposed woodland planting in perpetuity unless otherwise agreed in writing by the Local Planning Authority

then PERMISSION, subject to:

1. The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans:
Site Location Plan (DD371L07 A)
Block Layout Plan (DD371L08)
Hard and Soft Landscape Plan (DD371L06 A)
Site Sections (DD371L05 A)
Reason: For the avoidance of doubt and in the interests of proper planning.
2. The application site shall be limited to the storage of motor homes, caravans, trailers, boats and containers and for no other use falling within Class B8 of the Town and Country Planning Use Classes Order 1987 (or any order revoking and re-enacting that Order with or without modification). No goods, plant or materials shall be deposited or stored in the open (or displayed for sale in the open) on the site other than in the area hatched black on the approved Block Layout Plan (DD371L08).
Reason: In the interest of the amenities and character of the area in accordance with Policies E8 and LHW4 of the Test Valley Borough Revised Local Plan (2016).
3. The use of heavy machinery, including access to the site by HGV vehicles and the shunting of goods and materials onsite, shall be restricted to the hours of 07:30 – 18:00 weekdays and 08:00 – 13:00 Saturdays only, with no such work on Sundays or Public Holidays unless otherwise agreed in writing by the Local Planning Authority.
Reason: In the interest of the amenities of the area in accordance with Policies E8 and LHW4 of the Test Valley Borough Revised Local Plan (2016).
4. There shall be no storage of any kind to a height greater than 3 metres measured from ground level.
Reason: To minimise the potential impact of the site in accordance with Policy E2 of the Test Valley Borough Revised Local Plan (2016).
5. Development shall proceed in accordance with the mitigation measures set out within Section 5 of the Wynford Industrial Estate, Belbins, Ecological Impact Assessment (ECOSA, January 2021). Thereafter, mitigation and enhancement measures shall be permanently maintained and retained in accordance with the approved details.
Reason: To ensure the favourable conservation status of protected species and enhance biodiversity in accordance with Policy E5 of the Test Valley Revised Local Plan (2016).

6. **No external lighting shall be installed until details have been submitted to and approved in writing by the Local Planning Authority. The submitted details shall include plans and details sufficient to demonstrate the location, type, specification and luminance level. External lighting shall be undertaken in accordance with the approved details and retained thereafter.**

Reason: To safeguard the amenities of the area and to ensure the favourable conservation status of protected species in accordance with Policies E2 and E5 of the Test Valley Borough Revised Local Plan (2016).

7. **Within 3 months of the permission hereby issued, a preliminary risk assessment and site assessment shall be submitted to the Local Planning Authority. The submitted strategy will include the following components:**

1. **A preliminary risk assessment to identify the extent and nature of the historic landfill and any potential contaminants present. This should be used to develop a conceptual model of the site indicating sources, pathways and receptors and any potentially unacceptable risks to controlled waters arising from contamination at the site**
2. **A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off-site.**
3. **A method statement for proposed works based on the finding of (2) demonstrating that the works will not result in an unacceptable risk to controlled water.**

Within 3 months of the Local Planning Authority issuing approval, the works shall be completed in accordance with the approved details.

Reason: To ensure a safe living/working environment in accordance with Policy E8 of the Test Valley Borough Revised Local Plan (2016).

8. **In the event that contamination not previously identified is found to be present at the site then no further use (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the Local Planning Authority. The remediation strategy shall be implemented as approved.**

Reason: To ensure a safe living/working environment in accordance with Policy E8 of the Test Valley Borough Revised Local Plan (2016).

9. **The drainage system hereby permitted shall be constructed in accordance with the approved documents:**

- **Flood Risk Assessment; Project Number: 23448; dated: 9th November 2020.**
- **Drainage Features with Historic Monitoring Points Overlay; DRG No: 101; dated: December 2020**

Any changes to the approved drainage strategy and associated documentation must be submitted to and approved in writing by the Local Planning Authority and the Lead Local Flood Authority in consultation with the Environment Agency where necessary. Any revised details submitted for approval must include a technical summary highlighting any changes, updated detailed drainage drawings and detailed drainage calculations. Implementation of the surface water drainage system shall be in accordance with the approved details and retained thereafter.

Reason: To ensure that the development does not result in the deterioration of water quality and unacceptable level of surface water flooding or an unacceptable polluting impact on controlled waters in accordance with Policies E7 and E8 of the Test Valley Borough Revised Local Plan (2016).

- 10. Prior to the completion of the drainage strategy hereby approved, details for the long-term maintenance arrangements of the surface water drainage system shall be submitted to and approved in writing by the Local Planning Authority. The submitted details shall include:
 - a. Maintenance schedules for each drainage feature type and ownership**
 - b. Details of protection measures****

Management of the surface water drainage system shall be in accordance with the approved details and retained thereafter.

Reason: To ensure that the development does not result in the deterioration of water quality and unacceptable level of surface water flooding in accordance with Policy E7 of the Test Valley Borough Revised Local Plan (2016).

Note to applicant:

- 1. In reaching this decision Test Valley Borough Council (TVBC) has had regard to the National Planning Policy Framework and takes a positive and proactive approach to development proposals focused on solutions. TVBC work with applicants and their agents in a positive and proactive manner offering a pre-application advice service and updating applicants/agents of issues that may arise in dealing with the application and where possible suggesting solutions.**
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