

## **Application Reference: 25/03028/OUTS**

**Outline planning application (all matters reserved excluding access) for the development of up to 60 residential units, including 40% affordable housing, multi-functional green space, footpaths, and associated infrastructure.**

**Land West of Braishfield Road, Braishfield (Adjacent to Hill View Road).**

### **Application by Bargate Homes**

1. Braishfield Parish Council ('the parish council') **OBJECTS** to this application by Bargate Homes. The principle of development is unacceptable and were the outline application to be approved as submitted, the subsequent reserved matters application would provide no opportunity to correct obvious flaws in its layout or design. These conflicts with local and national planning policy significantly and demonstrably outweigh the benefits and as a consequence the application should be refused. The reasons for our objection are set out below.

### **Planning Policy Background**

2. We agree with the applicant that the relevant development plan policies for the determination of this application are those of the Test Valley Borough Council (TVBC) Revised Local Plan 2011 – 2029 ('the local plan') adopted in 2016 and reviewed in 2021. Since the local plan is now some years old, the policies of the National Planning Policy Framework (NPPF)<sup>1</sup> are a very important material consideration.
3. Preparation of a replacement TVBC local plan has reached an early stage with the Regulation 18 consultation on a draft document closing in September 2025. The parish council, along with many other organisations and individuals, objected to the strategy and detailed proposals which remain untested and unexamined. We opposed the inclusion of the site allocation for Braishfield on grounds of character and sustainability. We put forward a constructive alternative. In accordance with Paragraph 49 of the NPPF the emerging plan should not be accorded any weight in decision making. It would be a serious error of reasoning for TVBC to conclude that a policy or proposed allocation in the emerging plan which is itself contested can lend any support to this application.
4. We acknowledge that TVBC is currently unable to demonstrate a 5 year housing land supply as required by the NPPF. As a result at least some local plan policies in respect of housing are out of date and the presumption in favour of sustainable development ('the tilted balance') is engaged. Nevertheless, development plan policies remain the starting point for decision making. The applicant must demonstrate that their

---

<sup>1</sup> Published December 2024

proposal constitutes 'sustainable development' in order to benefit from that presumption, having particular regard for the NPPF's policy of:

*directing development to sustainable locations<sup>2</sup>*

5. In December 2025 the government published a consultation version of a new NPPF (NPPF 2026) which is likely to become live sometime in the first half of 2026. Emerging government policy can constitute a material consideration for decision makers. This new version of the NPPF places even greater emphasis on the location of development as a measure of sustainability. Proposed Policy CC2 of the new NPPF says that:

*In order to contribute to climate change mitigation and the transition to net zero, development proposals should, where relevant:*

- a. *Be located where a genuine choice of sustainable transport modes exists, and improve opportunities for walking, wheeling, cycling and public transport, in accordance with policies TR3 and TR4*
6. This is a speculative application outside the settlement boundary of a Tier 3 rural village. It is contrary to local plan policy and the guidance of the NPPF (in both its current and emerging form). The local plan identifies clear reasons why new housing on this scale in Tier 3 settlements would not be preferred. None of the evidence which supported that policy position has changed.

## **Conflict with Development Plan Policies**

### Principle of Sustainable Development in a Rural Location

7. Local plan policy COM2: Settlement Hierarchy says that:

*Development outside the boundaries of settlements in the hierarchy (as identified on map 1 -55)<sup>3</sup> will only be permitted if:*

*it is appropriate in the countryside as set out in Revised Local Plan policy COM8-COM14, LE10, LE16-18; or*

*it is essential for the proposal to be located the countryside.*

---

<sup>2</sup> Para 11(d) ii

<sup>3</sup> This includes Braishfield

8. The site lies outside the settlement boundary of Braishfield and therefore in open countryside. It does not benefit from any of the exceptions offered by COM2. Table 7 which forms part of the supporting text for COM2 identifies rural villages, such as Braishfield, as a suitable location only for windfalls, replacement dwellings or community led development to meet specific local need. The scale and nature of this proposal conflicts directly with COM2.
9. The local plan, NPPF and the consultation draft of NPPF 2026 are consistent in directing development only to those locations where the use of the private car is not the only viable option by which residents can reach essential services and social/leisure activities.
10. Within the local plan, development in Tier 3 settlements is limited to replacement, windfall or projects that would meet essential local needs. Very little has changed in the village since the adoption of that plan and in particular no additional facilities, services or sustainable transport links have been provided. An increase in the government requirement for housing at a borough wide level has not made Braishfield a more suitable location for development than it was in 2016 when the local plan was adopted.
11. According to the NPPF (Paragraph 110), significant development should be focused on locations that offer a genuine choice of transport modes. Braishfield lacks the high-frequency public transport and local services required to support 60 additional households. This will inevitably lead to an over-reliance on private car journeys, conflicting with Policy T1 (Managing Movement) and the government's wider climate change mitigation goals regarding carbon reduction in the transport sector.
12. Policy TR3 a. of the consultation draft NPPF 2026 requires that:

*Development proposals which could generate a significant amount of movement, in the context of the area in which they would be situated, should be in locations that are, or can be made sustainable, by limiting the need to travel and offering a genuine choice of transport modes for residents and users, unless the nature of the use makes this impractical.*

13. The applicant's Transport Statement<sup>4</sup> has nothing meaningful to offer in relation to active travel or promoting sustainability. From the half-hearted attempt to claim that the site is well connected by walking, cycling or public transport even the authors of the Transport Statement seem unconvinced by the evidence they are able to provide. That is understandable (and to their credit) given the location and the policy context.

---

<sup>4</sup> Paul Basham Associates December 2025

14. No major services except the primary school are within walking distance. No improvements are proposed to walking or cycling infrastructure that would increase mobility within the village or access to larger settlements. The only bus service reasonably accessible to occupiers on the site runs once per day on weekdays only. It does not operate at all at weekends. It is not reasonable to suggest that young children, elderly people or those with limited mobility should consider a 2km walk along a busy road to and from the next nearest stop a feasible option. The location and the development are unavoidably car dependent. Any 'modal shift' that can be achieved from the baseline figure will arise from the continuance of national trends. The applicant's resigned approach is summarised in the Transport Statement when it says:

*As agreed by the within the pre-application response, a Travel Plan will not be provided for the site due to its relatively small scale at 60 units. Therefore, no promotional material would be provided to future residents.<sup>5</sup>*

15. Put another way, that statement suggests that neither the applicant nor Hampshire County Council can see any point in trying to encourage sustainable travel where it is simply impossible. We have to agree. On any metric the application site would not constitute a sustainable location for development of this scale. It is simply false and lacking in any credibility for the applicant's Design and Access Statement<sup>6</sup> to describe the site as 'inherently sustainable' and suggests a very limited understanding of what that concept really involves. Significant areas of land closer to Romsey centre are much better connected and would achieve greater levels of connectivity and sustainability.
16. We understand that TVBC is required by central government to make higher provision to meet the need for new homes. But that does not alter the fact that the application site is an unsuitable location for new housing on this scale. What is proposed is a major housing development of a type to be expected on the immediate edge of a large village or small town which already has good links to service requirements. Braishfield is a dispersed 'Tier 3' settlement which the local and national policy correctly identifies as being unsuitable for such development<sup>7</sup>.
17. Further evidence in support of this argument is provided by the Connectivity Tool produced by the Department for Transport which government now advocates very specifically as a mechanism for assessing the suitability of locations for

---

<sup>5</sup> Transport Statement Para 6.16

<sup>6</sup> Mosaic Urban Design and Masterplanning December 2025

<sup>7</sup> TVBC should have regard to the reasoning applied by the planning inspector in dismissing an appeal for a similar scale of development in a rural village at Frampton on Severn APP/C1625/W/25/3365253 (December 2025)

development.<sup>8</sup> The overall connectivity score for the application site is approximately 30 out of a possible 100<sup>9</sup> as shown on the extract below:

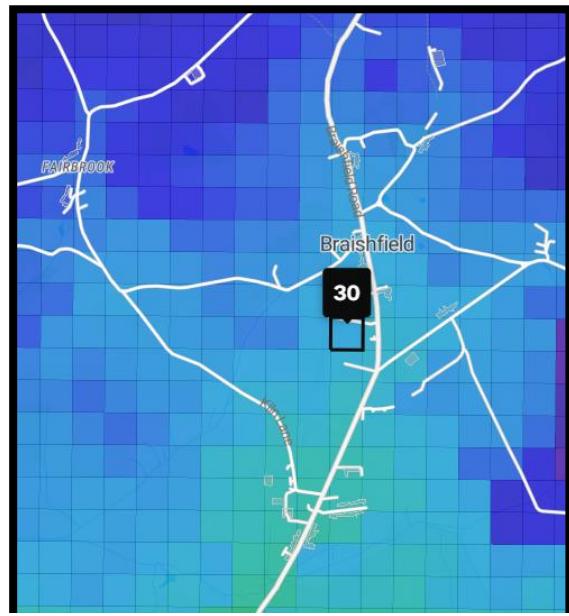


Figure 1 Excerpt from Connectivity mapping tool

Whilst there is no ‘pass/fail’ level established by the Connectivity Tool it is obvious that a score in the lowest third confirms our submission that this is not a well-connected location.

18. Where an application is made on a speculative basis, the choice of site is made entirely by the applicant. There is no reason why housing development ‘has to be in Braishfield’ because there is no evidence of local need for new housing on that scale. It falls to the applicant to justify their choice of location and to demonstrate how the proposed development will be sustainable which it has inevitably failed to do.

#### Impact on Local Character

19. This application has been made in outline with an indicative layout and a proposed (totally inadequate) parameter plan.
20. We have serious concerns about the applicant’s tactics. 60 homes is a relatively small development and a full application seeking approval for detailed layout and design would have been perfectly feasible. That would have given TVBC and consultees the opportunity to properly evaluate the impact of the scheme on local character and setting as part of the decision making process. In a rural location with a distinct local

<sup>8</sup> The consultation version NPPF 2026 Policy TR3 2.

<sup>9</sup> The majority of built development within the application site lies within this ‘square’ of the Connectivity tool. Scores relative only to locations in TVBC produce a different result but relative scores cannot be considered a proper measure of the sustainability of a particular location for those who would actually live within a proposed development.

character the layout and design of any new development and its relationship to the surrounding environment is crucial.

21. The supporting text for policy E1: High Quality Development in the Borough specifically notes that development in settlements with a '*distinctive linear character*' must be '*sensitively designed to take account of the siting of buildings and scale.*'<sup>10</sup>
22. Policy E1 requires that any development proposals are of high quality in terms **design and local distinctiveness**. In particular they:

*should integrate, respect and complement the character of the area in which development is located in terms of layout, appearance, scale materials and building styles*
23. Policy E1 concludes by stating that

*Development will not be permitted if is of poor design and fails to improve the character, function and quality of the area.*
24. Paragraph 139 of the NPPF says:

*Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes*
25. Although this is an outline application and neither layout nor design are for determination at that stage, the indicative plan and the proposed parameter plan show a proposal to introduce a single 'estate' of 60 undistinguished dwellings into the village. This is a pattern of development completely alien to its current form and its historic character. Braishfield is a dispersed settlement with a linear pattern of building which has grown up over a long period of time. Recent development has respected that pattern. It is small in scale and laid out on short secondary roads and cul de sacs. In contrast, 60 dwellings in a single block with estate style access and distribution will have an urbanising effect on the village at a key location.
26. Despite what is said in the Design and Access Statement, the Bargate proposal conflicts directly with the Braishfield Village Design Statement (BVDS), adopted as a Supplementary Planning Document in 2021. The BVDS highlights the importance of the village's "linear and hamlet-based" settlement pattern. A single, high-density block

---

<sup>10</sup> Para 7.8 Page 111

of 60 homes would not respect the "gaps and open spaces" that the BVDS identifies as integral to the character of Braishfield character. The BVDS explicitly discourages large-scale "estate-style" developments. It advocates small scale, incremental growth that integrates with the existing street scene. It is deeply disappointing that Bargate Homes, who describe themselves as being 'better not bigger' show so little concern for local context in their approach.

27. The applicant's Heritage Impact Statement<sup>11</sup> fairly acknowledges that:

*the separation of the village and southern hamlet touches on heritage values as the introduction of built environment within the Site would have the effect of reducing the historic open space between the two settlements.<sup>12</sup>*

28. In heritage terms, this may not be represent a high level of harm. Nevertheless this assessment acknowledges just how important the open texture of the village remains. The Heritage Impact Statement accepts that there would be an adverse impact on the setting of historic assets such as the Wheatsheaf Public House. What the applicant underplays is just how damaging the proposed 'estate' form of development would be to the sense of place at this most sensitive point in the village fabric.

29. Whilst design and layout are not for determination at this stage, the question of whether there is a possible layout which meets the requirements of the BVDS and the local plan is a material issue at outline stage. Bargate has submitted a parameter plan that would, were the outline application approved, set the basis for a subsequent reserved matters application. The application must not be approved on the basis of the submissions in a flawed and superficial Design and Access Statement.

30. The parish council has commissioned Feria Urbanism, a highly respected urban design and planning consultancy, to analyse the Bargate scheme and its potential impact on the village environment. A copy of Feria's Design Review and critique of Bargate's Design and Access Statement is submitted with this representation. It demonstrates clearly why our concerns are so well founded and provides expert confirmation that it would be unacceptable for TVBC to grant outline consent where the inevitable result of doing so would be development in such a harmful and unsympathetic form.

---

<sup>11</sup> Foundation Heritage November 2025

<sup>12</sup> Ibid Para 9.8.30

## Conclusion

31. The current and draft new version of the NPPF are unequivocal in stating that sustainable development can only be achieved if the right location is chosen in the first instance. TVBC accepts that argument in the local plan. It does not allocate proportionately large areas of new housing to Tier 3 rural villages because it recognises that they are too remote and do not have access to the necessary facilities and services. That remains true today and pressure to provide additional housing at borough level has not altered the position. It is the applicant which has chosen this location and decided to submit a speculative application not the local planning authority or the parish council. It is for Bargate to make the case that it represents sustainable development and they cannot do so.
32. The layout and design proposed is alien and unsympathetic to the character of the village. It is somewhat ironic that the applicant's Design and Access Statement warns us that:

*The housebuilding sector is still blighted by bland, uninspiring developments.*

when this application seeks to impose just such a bland, uninspiring and also unsustainable development on a very special rural community.

33. This proposal undermines both local and national planning policy. It is on a scale and form completely unsuited to the village and has no regard for local character or historic context. There is a better way of providing modest and appropriate growth than is offered here.
34. For all these good planning reasons the parish council requests that TVBC refuses the application.

Yours etc

Braishfield Parish Council