

Dear Mr Parker,

Application Reference: 26/00796/FULLS

Demolish existing structures and construct 6 bungalows, access road and parking

Land At Pucknall Farm Dores Lane Braishfield Romsey Hampshire

1. Braishfield Parish Council (the parish council) **objects** to this planning application.
2. Allowing six new dwellings to be built in countryside outside of the settlement boundary of Braishfield would be contrary to important policies of the development plan. The harm caused would significantly and demonstrably outweigh any benefits. Even allowing for the operation of Paragraph 11(d) of the National Planning Policy Framework (NPPF), the application should be refused.

The Applicant's Fallback Position and Housing Supply

3. It is important to deal first with the relevance of the applicant's claim regarding the 'fallback' position.
4. Test Valley Borough Council (TVBC) has confirmed that the applicant may proceed with the creation of six dwellings through the conversion of one of the existing barns on the site under Class Q of the Town and Country Planning (General Permitted Development) (England) Order 2015.¹ We are aware of the representations made by Southern Planning Practice and Town Legal on behalf of Mr Richard Besse in which they take issue with whether the Class Q consent was properly obtained. Even if it was, we seriously doubt the applicant will decide to take it forward because the location is remote and the accommodation proposed so constrained that it is hard to see it achieving viable sales values. Nevertheless, assuming it was properly obtained, there may exist what the courts would consider a 'real prospect' of the Class Q consent being implemented. We do not dispute that this can be a material consideration when an alternative proposal is put forward, as established by the leading case.² It is important to point out however that this only confirmed that there are circumstances in which a fallback scheme might be a material consideration, not how it would affect the planning judgement in any particular case.
5. Since that judgement a line of appeal decisions (of which we cite two below) has made clear that the mere existence of a fallback scheme is not determinative. What is required is a judgement of the planning merits of the proposal, and then, as appropriate, a comparison to the fallback scheme. As one Inspector put it (our emphasis added):

¹ 25/02989/PDQS

² Mansell v Tonbridge and Malling Borough Council [2017] EWCA Civ 1314

*However, for significant weight to be afforded to a fallback position there needs not only to be a real possibility of it being carried out, **but it would also need to be equally or more harmful than the appeal scheme.***³

6. In an even more recent appeal the Inspector explained likewise (our emphasis added):

*There is no dispute between the main parties that there is a real prospect of this fallback position being implemented and, from the information before me, I have no reason to disagree. Consequently, this fallback position is a material consideration in the determination of the appeal scheme. **However, for significant weight to be afforded to a fallback position there needs to be not only a greater than theoretical possibility of it taking place, but also it would need to be equally or more harmful than the appeal scheme.***⁴

7. In our view the harm arising from the current proposal is significantly and demonstrably more significant than any benefit and on that basis it should be refused. Using the same criteria, it is also manifestly worse than the fallback scheme and there would be no justification for approving it as an alternative.
8. TVBC cannot currently demonstrate a five-year housing land supply and the addition of housing would normally be considered a benefit. However, because consent already exists (subject to it having been properly obtained) to provide six dwellings by way of the fallback scheme, no weight should be given to this in the planning balance. The application provides no benefit in housing supply terms over and above the fallback. The only question raised by the application is the extent of the harm that would be caused and whether it would be preferable to the alternative.
9. Even if TVBC were to disagree, the provision of six dwellings would have a negligible impact on the supply of housing in district, especially as they are in a remote and isolated location and likely to be unsuitable for most of those in housing need.

Policy Position

10. The application site lies in countryside outside the settlement boundary of Braishfield. It is not brownfield land, as the applicant incorrectly suggests, since at least a substantial part of the land involved was last used for agriculture (which the applicant confirmed in the course of the Class Q prior approval process). Land last used for agriculture is explicitly excluded from the brownfield definition. Nor is there

³ Appeal Ref: APP/L3245/W/22/3304958 Roundabout Farm, Roughton Lane, Roughton Easting: 376193 Northing: 293892 12 March 2023

⁴ Appeal Ref: APP/P1560/W/24/3345883 Stonehall Farm Buildings, Stonehall Lane, Great Oakley CO12 5DD 13 January 2025

any recognised category of ‘previously developed agricultural land’ as the applicant refers to it elsewhere in their Design and Access Statement (DAS).

11. The proposed development is therefore contrary to the strategic policies of the development plan and Paragraph 84 of the National Planning Policy Framework (NPPF), both of which restrict the development of greenfield land outside settlement boundaries and isolated homes in the countryside.

12. Policy COM2: Settlement Hierarchy of the adopted Test Valley Local Plan 2011 – 2029 (TVLP) says :

Development outside the boundaries of settlements in the hierarchy (as identified on map 1 - 55) will only be permitted if:

a) it is appropriate in the countryside as set out in Revised Local Plan policy COM8-COM14, LE10, LE16- LE18; or

b) it is essential for the proposal to be located in the countryside.

13. None of the exceptions provided for in COM2 a) provide support to the proposal as it meets none of the necessary policy requirements that would make it appropriate. COM 2 b) is not engaged since this cannot apply to speculative open market housing.

14. The application site is not adjacent to the settlement boundary or related to any existing use at Pucknall Farm. It is a requirement for Class Q prior approval that the decision maker considers whether the location is ‘undesirable’ or ‘impractical’ but these are not policy tests. The fact that TVBC granted prior approval does not mean that it has already agreed the site is a sustainable location for housing. The application is in direct conflict with COM2 which is one of the most important strategic policies of the development plan. There is no mechanism by which the existence of the fallback scheme has any bearing on the correct assessment of that conflict.

15. The hamlet of Pucknall consists principally of two farmsteads, set in working countryside some distance from the main part of Braishfield. It has no public services, facilities or amenities. A high proportion of the residential and working buildings are listed because their historic or architectural interest, speaking to the sensitivity of the built environment.

16. New housing in such an isolated location cannot be considered sustainable development as defined by the TVLP or the current NPPF. Residents would have no access to any local services except by use of private car. No facilities are available or proposed for play or recreation and none are accessible on foot or bicycle. The

consultation version of the forthcoming NPPF published in December 2025 also makes clear⁵ that only in exceptional circumstances will development be acceptable outside of settlement boundaries, none of which apply to this application.

Design Quality and Impact on the Countryside

17. The replacement of existing agricultural structures with a cul-de-sac of six new dwellings would be completely out of character with the countryside setting, surrounding buildings and the farmstead itself. It may have a significant visual impact through the introduction of new buildings, landscaping and the cul-de-sac road itself.

18. The TVLP requires high standards of design and careful consideration of landscape setting for any proposed new development. Policy E1: High Quality Development in the Borough Development says that:

Development will be permitted if it is of a high quality in terms of design and local distinctiveness. To achieve this development:

- a) should integrate, respect and complement the character of the area in which the development is located in terms of layout, appearance, scale, materials and building styles;*
- b) should not detract from the dominance of, or interrupt important views of, key landmark buildings or features;*
- c) neighbouring uses should be laid out to provide connectivity between spaces and a positive relationship between public and private spaces; and*
- d) makes efficient use of the land whilst respecting the character of the surrounding area*

Development will not be permitted if it is of poor design and fails to improve the character, function and quality of the area.

19. Policy E2: Protect, Conserve and Enhance the Landscape Character of the Borough sets out the following requirements:

To ensure the protection, conservation and enhancement of the landscape of the Borough development will be permitted provided that:

⁵ (Policy S5 Principle of development outside settlements)

- a) *it does not have a detrimental impact on the appearance of the immediate area and the landscape character of the area within which it is located;*
- b) *it is designed and located to ensure that the health and future retention of important landscape features is not likely to be prejudiced;*
- c) *the existing and proposed landscaping and landscape features enable it to positively integrate into the landscape character of the area;*
- d) *arrangements for the long term management and maintenance of any existing and proposed landscaping have been made; and*
- e) *it conserves the landscape and scenic beauty of the New Forest National Park or the North Wessex Downs Area of Outstanding Natural Beauty where applicable; and*
- f) *does not result in the loss of important local features such as trees, walls, hedges or water courses.*

20. The applicant has provided no useful supporting information by which the impact of the proposal can be assessed. There are no sectional plans or visualisations. The Design and Access Statement contains a single photograph which claims to be a 'Street Scene CGI' of a view from Dores Lane with no indication of what view this represents or statement confirming it as a verified image. There is no Landscape Visual Appraisal and no assessment of the effect on views, impact on receptors at any range or level of detail.

21. The various buildings of Pucknall Farm form a typical modern farmstead, including newer B1 uses as well as those associated with agriculture and equestrian activities. It is one of the defining farmsteads of the hamlet of Pucknall. Whilst the existing site buildings and facilities are not all beautiful, they form part of the agricultural character of the area and are fully integrated into the landscape 'baseline'. Replacing some of them with suburban-style residential dwellings would not improve the site as the applicant claims. It would introduce a completely alien and intrusive urban form of development into the countryside with no related justification or purpose.

22. The potential impact is increased by the proposal to install a 2m high acoustic fence around the boundary of western boundary of the site adjacent to the main complex of farm buildings is likely to have a harmful visual effect. No evidence (including any images or photographs) have been provided to confirm the applicant's claim that it has been designed as part of a 'wider landscape strategy'.

23. The proposed bungalows are poorly designed and no attempt has been made to make them sympathetic to their setting. No supporting information has been presented to demonstrate how that setting has influenced their form or the choice of materials. The Braishfield Village Design Statement⁶ (BVDS) is mentioned in the applicant's DAS, but no commentary or analysis is provided to show how it has been used in design development. There is no supporting information to demonstrate local distinctiveness or respect for the character of the surrounding area, including the farmstead pattern which essentially defines Pucknall as a hamlet as required by Guidance G5 of the BVDS which says:

Development proposals need to respect the hamlet layout of the village and its open spaces.

24. The applicant provides nothing by which TVBC can make any assessment of the impact of the proposal or its degree of conflict/conformity with policy E1 or E2 or Guidance G7 of the BVDS which says that:

New development should be supported by an appropriate landscaping scheme that reflects the character of the immediate area and the rural nature of the village.

25. No assessment has been made of the potential impact of external lighting (either installed with the scheme or by in-coming residents) on character of the area and dark skies as required by BVDS G11:

All external lighting should be muted, not produce glare or adversely affect the rural character of the night sky. The use of continual and bright external lighting should be avoided

26. In the absence of any of supporting information it is not possible to confirm that the proposal would not have an adverse effect on the setting of the six listed buildings that lie in close proximity to the application site.

27. The onus to demonstrate that the proposal would not cause harm to the character of the area or have an unacceptable visual impact lies with the applicant, especially when it conflicts so directly with policies in relation to the location of development. They have completely failed to satisfy this requirement. With no evidence to the contrary TVBC must reasonably conclude that the development would have a significant adverse effect.

⁶ Braishfield Village Design Statement was adopted as a Supplementary Planning Document in February 2021

Transport

28. We acknowledge that the highway authority found no reason to object to the Class Q proposal within the permitted scope of 'transport and highways'. It is unlikely that the traffic volume or access requirements of the current application would be materially different.

29. However, the highway authority's comments are necessarily limited to the provision of a safe and suitable access, and the number of vehicle movements. It could not comment or offer any view on whether the application site was a suitable location for development, taking into account matters such as access to public transport and the promotion of walking and cycling.

30. Policy T1 Managing Movement of the TVLP says that:

Development will be permitted provided that:

a) its location is connected with existing and proposed pedestrian, cycle and public transport links to key destinations and networks; and

b) measures are in place to minimise its impact on the highway and rights of way network and pedestrian, cycle or public transport users; and

c) the internal layout, access and highway network is safe, attractive, in character, functional and accessible for all users and does not discourage existing and proposed users; and

d) it does not have an adverse impact on the function, safety and character of and accessibility to the local or strategic highway network or rights of way network; and

e) Provision is made to support and promote the use of sustainable transport, including the submission of a site travel plan where appropriate.

31. The application site does not meet the requirement of part a) of Policy T1. It is not connected to any existing network of sustainable or public transport. Residents would be entirely car dependent for every functional or leisure journey, contrary to the principle of sustainable growth set out in Paragraph 110 of the NPPF.

32. This is an important and relevant policy conflict which TVBC is now able to consider. The existence of the fallback scheme does not prevent the unsustainable location being significant weight when considering the current application on its own merits.

Ecology and Biodiversity

33. The applicant has submitted an Ecological Assessment⁷ (EA) which gives an overview of potential loss or harm to biodiversity and protected species. However, no full bat survey has been carried out even though the EA acknowledges that:

The local area has high value for commuting, roosting and foraging bats as shown by the local records.

34. The EA acknowledges that mitigation measures, in particular controls on external lighting are species dependent but no attempt has been made to identify which species might be affected by the development. No lighting impact assessment has been provided. TVBC should require a full bat survey before the application is allowed to proceed further, and should consider the potential impact of unconstrained domestic lighting (such as security lights) on the environment and countryside setting.
35. Although we cannot be sure, it would appear from comments in the EA that the applicant relies upon the provision of new trees in private gardens as part of the measures to achieve statutory biodiversity net gain (BNG). That is not permitted under Natural England guidance on the operation of BNG because retention and future maintenance cannot be secured. TVBC should examine carefully whether the applicant's BNG matrix has been properly completed.
36. We also note that the site lies within the 15km range of the New Forest SPA and therefore will be considered to have an adverse impact on the SPA through an increase in recreational pressure. The applicant should be required to make and submit an assessment of this impact and confirm that it can be adequately mitigated.

Affordable Housing

37. The revised COM7 policy as set out in the Affordable Housing SPD requires a development of six dwellings in a designated rural area (such as Braishfield) to make a financial contribution equivalent to 20% of Residual Land Value. The applicant has made no specific reference to this requirement and the application is not policy compliant in that respect until there is evidence that it will do so.

Summary

38. Even if planning consent (by way of permitted development rights) exists for the provision of six new homes via a Class Q barn conversion that does nothing to alter the fact that Pucknall hamlet is not a suitable location for new housing. It has no facilities or services and any new dwellings will be entirely car dependent. The application site is outside the settlement boundary and in open countryside where development is not normally permitted for very good reasons, including the potential impact on

⁷ Peach Ecology April 2026

biodiversity. The fallback position is only material if it is considered to be more harmful than the scheme now applied for. It is our well founded view that the current proposal is both unacceptable in its own right and substantially more harmful than the fallback scheme.

39. The proposed cul-de-sac would be a suburban intrusion into a countryside landscape of open fields and agricultural buildings for which there is no need or precedent in Pucknall. The dwellings themselves have no design merit and have not taken any account of their immediate rural setting or the principles of the BVDS. The harm they would cause to the setting and the extent to which they would conflict with important TVLP policies and the NPPF would be significantly and demonstrably greater than that of the Class Q scheme, though both share many shortcomings in that they would be in an unsustainable location with no access to public transport, walking or cycling routes or local facilities and services.

40. The impact on ecology and biodiversity has not been properly assessed, and the inevitable addition of artificial lighting, domestic paraphernalia and vehicles will intrude on the environment in an entirely avoidable manner.

41. For these reasons the application should be refused.