



# Review of Refined Issues and Options Consultation Representations on behalf of the Ashfield Partnership 18 August 2020

## Introduction

This representation is submitted on behalf of the Ashfield Partnership on the Revised Issues and Options Consultation (RIO), in respect of its development interests in Romsey.

The Ashfield Partnership made representations on the Issues and Options document in August 2018 and these comments are re-iterated in their entirety.

## Living in Test Valley (Housing and Communities)

Policy COM3 and LE3: The Partnership supports the retention of the Policy COM3 allocation. However, it seeks the following amendments to Policy COM3 and Policy LE3:

### *Policy COM3*

1. Remove the land to the west of the railway from the allocation plan because it is not controlled by the Partnership, together with all associated text/policy references eg Policy COM3 d) iv).
2. Amend the allocation plan to re-position the main access further to the east off Luzborough Lane and reflect this in Policy COM3 f) ii).
3. Remove reference to the provision of landscape buffers in Policy COM3 d) i) and ii) to allow for development fronting Luzborough Lane and The Mountbatten School.
4. Move the position of the local centre further north on the allocation plan.
5. Amend Policy COM3 f) iv) to refer to "Facilitate pedestrian/cycle links...", recognising that the Partnership does not control the land to complete the connections in all cases.
6. It is considered that part f iv) - in so far as it relates to the railway bridge - should be amended to reflect a position that in the event that the Council considers that the railway bridge would support other Local Plan and wider objectives, it would be appropriate for policy to require the Whitenap Masterplan to make land available for delivery of the bridge at a future point by another party.
7. Identify a significant reduction in the extent of the parkland provision on the northern boundary and remove the parkland to the south of The Mountbatten School on the allocation plan under Policy COM3 c). This provision is unevidenced and will result in poor placemaking and connectivity.

### *Policy COM3 and Policy LE3*

It is considered that Policy LE3 should be deleted and key principles relating to employment-creating uses incorporated into Policy COM3 so as to provide one policy that provides for the comprehensive development of the site. However, it is also considered that reference to a specific area figure (whether square metres or hectares) for employment use delivery would not be appropriate in the absence of evidence and because of the specific characteristics of the site. Accordingly, it is suggested instead that Policy COM3 should establish broad objectives for those uses that generate employment on the site. These should include the promotion of a mixed and balanced community and opportunities for trip internalisation.

Policy COM3 should therefore include reference to promoting a broader range of uses that contribute to overall employment provision (ie not just B1 and B2 uses, but include the new commercial use class, education, care etc) the scale of which should reflect the capacity of the Whitenap site.

The Partnership welcomes the opportunity to work with the Council to agree precise wording that achieves the above.



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Settlement Hierarchy and Boundaries: It is considered that settlement boundaries should be amended to include the Hoe Lane and Whitenap sites, noting the comments above about the land west of the railway at Whitenap.

## **Working in Test Valley**

Integrating Housing and Employment Development: The RIO notes support at the Issues and Options stage for integrating housing and employment through mixed use development and co-locating uses. The Partnership supports co-location of residential and employment-generating uses on large sites as a means of achieving sustainable development by reducing single occupancy private car trips. However, the Local Plan should recognise that a broader range of uses that create jobs would be acceptable, rather than prescribing only Use Class B1 and B2 uses.

## **Enjoying Test Valley (Environment and Quality of Life)**

Design and density: The RIO notes the comments at the Issues and Options stage that design policies should not be overly prescriptive but should focus on local distinctiveness and local level guidance. The Partnership supports this, including a fabric first approach to construction.

Density: The Partnership suggests that policy should reflect NPPF provisions for making effective use of land and also assessing density on a site by site basis.

Sustainable Construction and Renewable Energy: The Partnership does not support a fixed % requirement for on-site renewable energy provision. This should be addressed on a site by site basis. The Partnership supports reference to the Future Homes Standard and Building regulations being the appropriate mechanisms to secure a fabric first approach.

POS and GI: The Partnership considers that the approach to accommodating POS typologies should be on a site by site basis. Some sites eg Whitenap will not be suitable for on-site formal recreation provision.

Water Supply and Quality: The Partnership considers that it is for the water companies and their funders (rather than local planning policy) to deliver improvements in water supply and quality. The Building Regulations contain standards for water conservation and pollution and do not need to be replicated in planning policy.

## **Infrastructure and Community Facilities**

It is understood that TVBC is preparing an Infrastructure Delivery Plan (IDP). It is suggested that this is subject to public consultation at the appropriate time.

### Transport/Comms/Movement

Cycling and Walking: The Partnership supports planning for increased choice for shorter pedestrian and cycle journeys. It is suggested that the emphasis should be on improving existing on and off-street routes in Romsey and North Baddesley. New routes should only be proposed where there is robust evidence to justify them.

Public Transport: It is noted that policies will be included in the Local Plan to encourage the provision and use of public transport and seek to enhance sustainable transport options. The role of bus operators in this



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process must be recognised, including an acknowledgement of the commercial considerations involved in decisions relating to the operation of existing and new routes.

Car Parking: It is noted that a policy to provide for adequate off-road parking in new developments is to be included and that some comments did not favour parking courts. It is also noted that a review of parking standards is being undertaken. In response, the Partnership supports a range of options to meet parking needs in new development, including on and off street plus well designed mews streets.

Electric Vehicle Charging (EVC): The Partnership supports the provision of EVC in homes where possible and reflecting Building Regulations, as appropriate.

