



**ROMSEY & DISTRICT SOCIETY
Planning Committee**

Reg.Charity 269308

Test Valley Borough Council,
Planning Policy
Beech Hurst, Weyhill Road,
Andover, Hampshire, SP10 3AJ

4th April 2022

LOCAL PLAN 2040 Consultation

Dear Sir / Madam

Romsey and District Society (RDS) wish to comment on Local Plan 2040 Regulation 18 Stage 1. Our comments are attached in accordance with paragraph 1.45 of the Stage 1 document. However, it has been difficult to comment paragraph by paragraph in the conventional way, although we have tried to do that. We find ourselves wanting to stand back and view the document as a whole

The Plan is a large document of 86 pages taking several hours to read in order to make constructive comments. The task is made more difficult because there is significant duplication and repetition. Because of its complexity would a better consultation be achieved by making a presentation of the content to a wider audience? It would also be helpful if there had been a summary explanation of the changes in approach being proposed coupled with an evaluation of options available.

Please note that these comments are entirely those of the RDS Planning Committee and you may receive other comments from the Natural Environment Committee of RDS. Please record and consider the points of each RDS committee separately

Yours faithfully,

Mrs. Sue Mullane
Secretary for the Planning Committee
Romsey and District Society

Copy to Graham Smith, Head of Planning Policy & Economic Development, TVBC.

ATTACHMENT: Comments on Local Plan 2040 regulation 18 Stage 1

Note: Document pages are identified as **pages**, paragraphs are numbered.

Chapter 2 – Vision, Key Challenges and Objectives

The crux of the entire document is in the first sentence **(2.1)**: “Central to preparing the Local Plan is understanding the key challenges and opportunities facing the Borough and our communities, which in turn informs the Plan’s Vision and Objectives.”

In our view these key challenges and opportunities include (not necessarily in priority order):

- Climate Emergency measures including flood defences, house insulation and electric charging points
- Town Centre focus on Leisure to reflect changes in retail / online environment
- visible progress on South of Town Centre development
- Alma Road and Winchester Road traffic congestion
- unlocking the Brewery Site
- important details in completing the Whitenap site, including a railway footbridge
- more flexible public transport because of expected rise in fuel prices

This list, which we do not claim to be complete, is a formidable one. It should be reflected throughout the Plan, and we look forward to it being addressed fully in later stages of plan preparation. It is behind most of our comments below. But to reiterate: we are concerned that our detailed point-by-point textual comments (while necessary of course) can easily lose sight of the overall picture.

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2.5-2.6. The National Planning Policy Framework (NPPF) definition of sustainability is too broad to be practically useful: “Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs.” For example, this does not address the need for public transport for settlements to ensure social cohesion. Sustainability should cover Social, Economic and Environmental issues. It needs to be defined so that the aspiration could be converted into a measurable objective promised in Stage 2 at Borough level. A matrix approach, with variable weightings according to context, seems to us the best approach.

Page 18

2.21 The Vision summarises TVBCs overarching ambitions that communities will be prosperous and resilient with well-designed developments, a thriving economy and good quality healthy living. Perhaps understandably this is at a high level of generalisation, and we expect stage 2 wording to show how the infrastructure will be delivered in support of sustainability as newly defined. How the Borough can promote a thriving economy will be another essential topic.

Page 19 on.

2.26 – 2.64 The Objectives.

The 10 draft OBJECTIVES describe in essence **Ideals**.

For example, in Objective 10 - Transport and Movement (**2.60 – 2.64**) it is unclear what practical objectives can be identified so that TVBC policies specifically enable better public transport. Stage 2 must state realistic objectives which can be measured showing progress towards these ideals.

Chapter 3 - Spatial Strategy

Pages 26-29; Sustainability

3.2 – 3.18. The application of the three objectives of sustainability contained in the NPPF to the needs and circumstances of Test Valley was addressed in the Spatial Strategy Topic Paper

This produced the Test Valley Sustainable Spatial Strategy. We have no comments on that strategy.

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3.17. The delivery of the Test Valley Sustainable Spatial Strategy requires the Spatial Strategy Policy 1 Settlement Hierarchy. We support the principle of allocating settlements to tiers of different levels of present sustainability but would wish to see stronger provision directed to the improvement of sustainability in the lower tiers, particularly Tier 3. A strict application of sustainability criteria would lead to development being concentrated in Tier 1 and Tier 2. Sustainability in lower tiers is likely to decline over time and decline faster in the absence of appropriate development. We note that the Plan considers that Neighbourhood Plans can play a role in delivering spatial strategy and we would urge that they also be considered in respect of development in Tiers 3 & 4. But it can be a big ask for communities to undertake the development of a Neighbourhood Plan, and we would like to see later LP draft documents proposing very specific encouragement and support to them to do so where appropriate.

Chapter 4 - Strategic Policy Framework

General comments

The 5 strategic policies appear to represent a complete high-level set and there are no apparent gaps at this stage of the process. The narratives seem to be comprehensive in what needs to be included and considered for the framework. The document does not however enable us in any detail to understand how these policies might be realised. We look forward to such information being provided in the next phase.

4.8 This assumes that the flood prevention works carried out in Romsey 5 years ago will be adequate to mitigate flooding.

4.28 We would suggest that Design & Access Statements for Developments should include demonstration of sustainable use of resources and effective use of land. The obligation to provide such a statement will raise the profile of the issue.

Page 41 **SUMMARY - Strategic Policy 1 – Countering Climate Change**

4.29 The principles set out are: Reducing energy demand; Minimise unnecessary travel; Infrastructure adaptable to needs of changing climate; Flooding resilience, and efficient use of water; Ecological resilience; Reuse land efficiently. We support these general principles and the prominence given to mitigation of the effects of the Climate Emergency.

4.33 In order to raise the profile of the issue, we would suggest that Design & Access Statements for Developments should include, where appropriate, an assessment of lifecycle carbon emissions.

Page 43 **Environment**

4.41 This section on the environment seems reasonable. Our comments on some of the key environmental topics to be addressed in the next stage of the local plan 2040 are as follows

- a. We note that the authority intends to rethink the approach to protection and enhancement of Landscapes. We consider that this is a laudable aim which should be developed across the Test Valley area and not just in the North Wessex Downs and New Forest as seems to be indicated.
- b. We strongly support having local gaps between communities. This contributes to protection of landscapes and efficient provision of infrastructure to new developments. In this regard both specific boundaries and design criteria should be defined.
- c. We support enhancement of green infrastructure and suggest that in the next stage there should be specific targets for numbers of trees planted.
- d. We support enhancement and protection of Public Open Spaces.
- e. Historic Environment. We support objectives which protect the historic centre of Romsey. However, it must be recognised that there is sometimes a need to make alterations to reflect evolving use requirements.

Page 46 **Strategic Policy 2 - Delivery of Sustainable and High-Quality Development**

4.53 We would support a major push on footpath access to riverbanks.

Page 48 **Delivering Healthy, Well Designed Developments**

4.58 Our comments on each of the key environmental topics to be addressed in the next stage of the local plan 2040 are as follows

- a. In respect of specification of the green infrastructure of new developments the area specification should be on a quantity as well as a quality basis. Planting schemes will have a defined life span and obligations on maintenance must be included.
- b. Movement & Access requirements need to focus on Town Centres. Access for pedestrians has been improved by the Piazza in Romsey Market Place. However, traffic congestion in Alma Road and Winchester Road is a major issue. A traffic and transportation study is required to determine an optimum solution.

- c. The architectural panel has an important role to play in advising planning officers.

Page 50 Andover & Romsey Town Centre

In addition to Andover and Romsey, Town Centre Plans should be developed for other settlements in Tiers 2 and 3 as defined in Appendix 1. Specifically, as is noted in Chapter 1 Paragraph 1.5 *“At the centre of the Borough is Stockbridge, on the river Test, which acts as a centre for many of our more rural communities”*. This is a thriving local community which should be consulted.

4.74 and 4.75 South of Romsey Town Centre Master Plan

Possibly due to the general slowdown caused by the pandemic, there is little visibility of progress for the general public. Hopefully this will have changed by the date of the stage 2 of the plan.

Chapter 5 - Meeting the Needs

This section covers the vision for new homes, jobs, and associated infrastructure and feeds into the rolling Council corporate plan. The broad aim is to plan sustainable development to meet the Borough’s needs. A general comment refers to the consequences of definitions of sustainability. The Government describes it as action carried out to meet current needs while doing nothing which will limit meeting needs of future generations. However, in simpler terms the critical element in sustainability in Borough housing and employment is timely public transport. This applies particularly to Rural Exception Sites and First Homes Exception Sites but is not discussed in this stage of the LP generation. As mentioned in our comments on paras 2.5 and 2.6 above, we believe that there should be matrix-style measurement of sustainability at Borough level. A definition of sustainability should be included in the document glossary.

Page 69 Housing

5.17 Our Society has suggested that moving the dividing line between North and South Test Valley northward, to roughly the A30, would reflect the existing natural influence of Romsey town in the South of the Borough and in the long term bring a cohesion to infrastructure provision. We endorse this proposal and note and support the proposed HMAs.

1.40 should be **5.40**

5.24 Is the residual requirement 4453 or 4560?

5.26 We agree the policy outlined in paragraph 5.25.

5.33 We would encourage the social mix obtained by permitting a quota of market housing in Rural Exception Sites.

Page 76 Nomadic community.

We are surprised that sustainability is not listed as a consideration in assessing site availability. We also believe a minimum hygiene infrastructure maintenance task should be recognised for both projected and in-use sites. This responsibility should be included in the Borough strategy.

Page 77 Economy

5.53 Future employment needs.

We recognise the difficulty in forecasting employment capacity but would expect Stage 2 to address the linkage between job and home - showing evidence of sustainability.

5.56 and 5.60 Future Employment Needs. On face value the PfSH study on Needs gives an inflated figure based on recent activity. We support the sense of paragraph 5.57.

5.61 4th bullet point. We would like clarification as to “reuse”: Stage 2 of Reg 18 should state whether it is for employment purposes or for conversion to agriculture worker accommodation? Policy should also address erection of a new dwelling to replace a permitted development (PD) conversion of a building in the countryside. This relies on a ‘fall back’ position where the principle of a residential use is relied upon, following a decision for PD for a barn conversion, to justify the erection of a new dwelling – a dwelling which otherwise would be contrary to the Local Plan policies for development in the countryside. Even where that ‘fall back’ position is justified, a new dwelling in place of the barn conversion should be of a design, scale, appearance, materials, position, that is commensurate with the barn being replaced. There should be no significant impact on the countryside.