



ROMSEY & DISTRICT SOCIETY

Natural Environment Committee

Please reply to:

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Planning Policy and Economic Development
Test Valley Borough Council
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Draft Local Plan 2040

The Natural Environment Committee of the Romsey and District Society would like to make the following comments on the Draft Local Plan.

Please note, that our comments are generally limited to the areas of Southern Test Valley around Romsey. They are also limited to policies connected with the natural environment; further comments may be received from our Planning Committee and should be considered separately.

We find the local plan as it stands is somewhat fragmented; the theme-based policies, Evidence Studies, Associated Documents and Topic Papers overlap with the other chapters, making it hard to construct a cohesive response. There is a considerable weight of material to be considered.

CHAPTER 2: VISION, KEY CHALLENGES AND OBJECTIVES

We note that "Development will take place in sustainable locations and support the delivery of infrastructure" and that our diverse ... resources will be safeguarded for future generations to enjoy including access to our outstanding countryside". However, extending the settlement boundaries further out into the countryside will diminish that very countryside. We note also that the vision is that "The market towns of Andover and Romsey will have thriving town centres, offering high quality connected green and public spaces and a mix of leisure, shopping and cultural facilities and homes, with sustainable transport connections."

CHAPTER 4: TEST VALLEY COMMUNITIES HOUSING SITE ASSESSMENT

4.6

We note that this excludes sites put forward for housing for less than 10 houses; however, these are often appropriate sites for rural locations, and taken together may contribute a good proportion of houses required.

SOUTHERN TEST VALLEY

4.137

The housing allocation for southern Test Valley makes no allocation for housing within Romsey Town Centre. We understand that there is a proposal within the South of Town Centre masterplan for approximately 30 additional homes. This is an ideal location for additional housing being within easy reach of all facilities including public transport.

4.145

We welcome the vision for more green spaces in Romsey Town Centre as indicated in the plans for the development of the area south of the town centre and on the brewery site; there are also opportunities to make other areas along waterways in the town more accessible and attractive and more trees in the town centre to reduce pollution and give more shade in summer, helping to ameliorate climate change.

STRATEGIC HOUSING SITE ALLOCATIONS

SOUTHERN AREA POLICY 4 (SA4): LAND SOUTH OF GANGER FARM, ROMSEY

4.171

We note the comments regarding Ganger Wood, which is a designated SINC. However, no mention is made of the other 6 SINCs which would be impacted by the site, Ganger Farm Meadow, Ganger Farm Marsh & Woodland, Ganger Swamp, Small Copse, Ganger Wood Meadow and Ganger Wood Strip. The purpose of designating SINCs is to protect their ecological value. This does not appear to be considered. We have already made comments on our ecological concerns on the existing planning application 23/00964/OUTS. However, a suitable buffer is needed to each of the SINCs to ensure that they are protected for the future.

4.172 We note the requirement for connections to public transport networks, although the application for this site suggests cycling times to bus stops, which is unrealistic, given the lack of anywhere to securely leave a bicycle at a bus stop. The location is a 45-minute walk to the town centre and 37 minutes to the railway station. The bus service is once an hour at most times, with an alternative route running 3 times a day from different stops. This does not fall within the definition of frequent; by definition (according to Government Statutory Document 14: Local Bus services in England (outside London)), “where the service interval is 10 minutes or less, a statement of that fact [frequent] may be given”. An hourly service cannot by definition be described as frequent.

Also, buses sometimes do not run, and people are not prepared to use an unreliable service, especially if it means a very long walk home carrying shopping. Local shops do not have a wide enough range of items for weekly needs. The bus tracking app does not always have information on a particular service, leaving a doubt as to whether or when it will run.

SOUTHERN AREA POLICY 5 (SA5): LAND SOUTH OF THE BYPASS, ROMSEY

Again, this is a greenfield site, and the area is important for roosting, foraging and commuting bats. The woodland needs to be protected for their use, and a suitable buffer for the parkland beyond. However, the location does have more sustainable transport links.

SOUTHERN AREA POLICY 6 (SA6): LAND AT VELMORE FARM

4.191 We note that once again there is reference to a frequent bus service (Bluestar 5). As previously stated, an hourly service cannot by definition be described as frequent.

4.192 Care should also be taken to avoid impacts on Great Covert SINC. This is important for ground-nesting birds such as Woodcock and Nightjar, so disturbance by dogs during nesting season would have a serious impact.

SOUTHERN AREA POLICY 7 (SA7): LAND AT KING EDWARD PARK, AMPFIELD

4.203 The site has good connectivity by private car, but the nearest bus stop on Baddesley Road has only 4 buses per day each way. For older people in particular, this would not be an adequate level of service.

CHAPTER 5: THEME BASED POLICIES

5.5 CLIMATE CHANGE

POLICY CL1: COUNTERING CLIMATE CHANGE

Development will support the delivery of a net zero carbon future and address the impacts of our changing climate through both mitigation and adaptation.

The local plan states very clearly that TVBC will take positive action to ameliorate the effects of climate change through minimising the impact of new development through location, layout, and design and by using nature-based solutions. TVBC's Climate Emergency Action Plan is crucial in furthering its aims towards carbon neutrality. It quotes the NPPF several times regarding the concept and definition of sustainable development and the need to cut carbon emissions and reduce vulnerability to weather and flooding.

Key needs that are addressed in the document include: increased and more adaptable public transport especially to the villages and North-South in the borough; accessible footpaths and cycle ways that are safe and accessible to use; connection between the villages; the importance and role of SINCS, LNRs, NNRs and SSSIs in managing and mitigation against climate change, which of course includes the importance of trees and hedging in urban and suburban areas as well as the rural environment; the use of vegetation to maintain soil structure and control leaching and run-off from roads and farmland; the importance of planning controls on all new housing, public buildings, and industrial developments to ensure that roof PV panels are encouraged as well as considering the areas of the borough which can be used to generate wind energy. The wording of the document is very detailed and makes positive proposals as to what needs to be done in a theoretical sense to reduce the impact of climate change. However, there is great use of passive terminology which compromises the probable effectiveness of any planning controls and provides a get-out for developers. The term "mitigation" is used but this tends to be a way of transferring the problems of pollution or emissions to another locality and is a negation of responsibility. The local plan must have the power to set controls in place before any development proceeds. The NPPF does not appear to have the power to enforce the development of urban brownfield sites, such as the Romsey Brewery Site, over expansion into the countryside. Such sites are valuable in reducing the need for the use of private cars. This is an ongoing problem that successive ministers and MPs have failed to address. Sections in the Local Plan relating to Biodiversity are of utmost importance in the reduction of the impacts of climate change. The promotion of SSSIs, SINCS and LNRs and the use of wilding areas around towns and villages has been shown to have a positive effect on species diversity and the health of our countryside; trees and shrubs

cool the surrounding air and ground, and roots hold the soil in place and through transpiration absorb water from the ground thus reducing run-off.

GREEN INFRASTRUCTURE

5.27 Green infrastructure can deliver multiple functions, including storing carbon, providing cooling and shading, helping manage flood risk (including through sustainable drainage systems), conserving and enhancing biodiversity, and supporting opportunities for improvement to health and wellbeing. In considering green infrastructure and how it integrates into new development, regard should be had to its extent, quality, the level of connection to the network, and the functions it is delivering. Where possible, nature-based solutions should be utilised and prioritised, including in relation to water management.

5.28 Ecological networks form part of the green infrastructure network but also need to be considered in their own right. Such networks are important to help conserve biodiversity, enable migration and dispersal of species, and potentially play a role in enabling habitats and species to respond to a changing climate. Factors that will need to be considered in seeking to conserve and enhance coherent and resilient ecological networks, include scale, quality and connectivity.

This is to be commended and is an improvement on previous statements. However, there is no mention as to how this is going to be achieved. TVBC's existing policy documents in this area show a few fragmented sites that have high levels of protection but no indication as to how they are going to remain connected. Individual planning applications take account of SINC's and other designated protected sites that are immediately impacted by the proposal but there is no overall framework for them to be judged against.

FLOOD RISK

2.49 We welcome support for recognition of Groundwater flooding problems.

4.177 Ganger Farm South: We welcome acknowledgement of the sequential approach for locating development to areas with the lowest flood risk from all sources.

4.178 – 186 South of Bypass: There is no mention of Flood Risk Assessments being considered. Along the western boundary the site is in Flood Zone 3 (high). Part of the site is shown to have low risk of surface water flooding but not nil. Both these aspects should be considered in an FRA.

4.199 Velmore Farm: Again, we welcome acknowledgement of the sequential approach for locating development to lowest surface water flood risk areas. Areas near the existing streams are High to Low risk.

4.197 & 4.206 (& King Edward Park): Wastewater is expected to go to treatment works linked to River Itchen SAC which will need to be mitigated. There is no mention concerning wastewater from other sites which will discharge to treatment works linked to the River Test.

4.204 King Edward Park: We welcome confirmation that SUDS is required for mitigating the impact on Trodds Copse SSSI.

However, generally little mention is made of SUDS requirements to protect existing small streams. South of Ganger Farm has a stream which could adversely affect St Swithun's church & Crampmoor if uncontrolled run off is allowed from the developed areas.

4.222 - 4.233 Extension of Abbey Park & South of Botley Rd: some areas have High to Low surface water risks which need to be assessed. Also run off to the south needs controlling; this could affect the hydrology of Luzborough Plantation.

4.246 Extension University Science Park: this site will be affected by Flood Zone 2 and Surface water flooding.

POLICY CL2: FLOOD RISK

5.32 - 5.43 This section covers all the generic requirements and 5.40 covers developments that are 'required' to incorporate SUDS. We suggest that this requirement should be applied to all development.

5.41 We welcome the mention of CIRIA design standards; arrangements for future maintenance need to be in place.

5.42 Nature based methods are preferred to achieve policy requirements, however, when run off is being controlled there needs to be evidence and subsequent monitoring that the outcomes are being met in practice. Although such a policy should be supported much of the current evidence is ad hoc and needs more objective scrutiny.

We note that the South of Ganger Farm extension area is identified as an area for 'Wider Catchment Woodland' planting. This would help slow run off in the Tadburn Lake catchment. Developing this area would clearly be counterproductive to 'Working with Natural Processes' (Sheet Fig 8E Opportunities to Reduce the Impacts and Cause of Flooding, Appendix A).

The 'Dutch' methods of dealing with surface water run off should be considered, where water is retained on the surface and reducing the use of buried pipes.

Inevitably traditional piped systems can be overwhelmed or blocked. The roads should be designed to accommodate excessive surface water flow from their adjacent ditches or swales caused by intense rainfall. Normally this will be for only a short period of time and suitably designed will protect property with minimal inconvenience to road users. With climate change leading to more intense storms, it is going to be difficult to design for all eventualities and systems need to deal with short term exceedance events safely.

5.43 The policy to ensure suitable width corridors either side of a watercourse is to be supported. The widths for such corridors should be more than the minimum proposed. The opportunities for deculverting should be seen as a default requirement of any development unless there are overriding reasons against it.

POLICY CL3 SUSTAINABLE BUILDINGS AND ENERGY USE

We welcome the proposals in this policy, although there is no mention or requirement for incorporating solar panels in housing or industrial units. A talk at one of the Romsey Forums last year said that councils could require this as part of planning even if it is beyond the minimum national requirements - the case of Oxford Council was cited as doing this. This policy overlaps with policy CL5.

POLICY CL4: WATER USE AND MANAGEMENT

5.68 The policy requires that adequate infrastructure is in place to ensure that development does not risk having an adverse effect on the water environment. In some cases, development may need to be phased if existing infrastructure and treatment capacity is insufficient to meet the increased demand at the time. Where this infrastructure is provided through connection to the mains systems provided by

water companies, it would be for the relevant water company to advise on the adequacy of capacity, rather than the Environment Agency.

5.59 - 5.69 This section covers the requirements for water efficiency and impact on the Test at low flow times. The policy supports non-residential developments to achieve one credit through BREEAM criterion for water use. There are already problems with water supply in Romsey; also the River Test is under water stress and further housing can only make this worse.

5.63 Unfortunately the proposed policy standard is not supported by the Planning Practice Guidance (limit to 100 litres/d/per).

5.68 The policy requires that adequate infrastructure is in place to ensure that development does not risk having an adverse effect on the water environment. Where this infrastructure is provided through connection to the mains systems provided by water companies, it would be for the relevant water company to advise on the adequacy of capacity, rather than the Environment Agency.

We would suggest that both should be consulted as it is in the water companies' economic interest to give consent.

POLICY CL5: RENEWABLE AND LOW CARBON ENERGY

We undoubtedly need renewable energy and the infrastructure to support it but again the report is passive and just says that the Council will take into consideration all their policies in considering any applications that are made to them. We would suggest that these, where possible, should be on existing industrial/ brownfield sites rather than on farming/countryside areas.

Disappointingly there is no mention or requirement for incorporating solar panels in housing or industrial units.

POLICY ENV3: LANDSCAPE CHARACTER

As with the rest of the plan this section says all the right things but is silent on how this is to be achieved. As future developments to meet housing and economic needs are mostly identified as sites in the countryside it clearly is not going to be possible to do what they are saying, eg the policy criteria require the health and future needs of existing landscape features, such as trees, watercourses and hedges, to not be prejudiced or compromised by proposed development.

All new developments in the countryside will have an adverse effect and the plan should be honest about this.

5.181 However, we welcome the recognition of the importance of views, historic and other landscape features or topography, watercourses, water meadows, distinctive skylines, trees and hedges, and that many smaller, individual landscape features can combine to establish the character and identity of an area. We agree that they should be protected and enhanced, as their loss, either individually or cumulatively, could have a potential impact on the immediate and wider character of the landscape. This needs to be taken into account where developments outside, or changes to the settlement boundary are proposed.

POLICY ENV4: LOCAL GAPS

This policy has recently been externally reviewed and confirmed as being desirable and robust which is to be welcomed.

The draft plan recognises the important role that these gaps can fulfil in terms of green infrastructure and green corridors. However as much of the land is held by developers who have no interest in maintaining biodiversity, thought needs to be given as to how they can be better managed/improved to support biodiversity and act as effective green corridors eg by perimeter tree planting and renovating existing hedgerows.

5.187 A Local Gaps Study (Stephenson Halliday, 2023) has reviewed the local gaps identified in the adopted Local Plan 2016 (through Policy E3) and policy approach. The Study recognises that Andover is separated from a number of small rural communities by relatively narrow but significant bands of countryside. Romsey, North Baddesley, Ampfield, Chilworth, Valley Park, and the larger urban areas of Southampton and Eastleigh are also characterised by the separation provided by the areas of countryside between and around them. The Study recognises that Local Gaps can also offer potential green infrastructure opportunities and may provide for wildlife corridors, whilst also offering health and wellbeing benefits for communities and access to green spaces and the countryside.

POLICY ENV5: POLLUTION

It is difficult to disagree with the fine sounding words but additional housing will put a strain on already struggling sewage systems and whilst surface water drainage can be dealt with through SUDS drainage schemes, all the damaging drainage will end up at local treatment centres which we know are discharging untreated sewage into our chalk streams on a regular basis. The policy states that development will only be permitted where it does not result in an unacceptable impact from pollution on human health, living conditions, the natural environment or general amenity, including through cumulative effects. It also states that development will be designed and maintained to avoid or mitigate pollution to an appropriate standard and to prevent any unacceptable impact. It should also take opportunities to improve local environmental conditions, such as air and water quality, wherever possible. Sewage is also covered by the water section (Policy CL4) which covers discharge to River Itchen SAC but not explicitly the River Test SINC.

POLICY ENV6: LIGHTING

5.205 – 5.211

As stated in this section, darkness is essential for biodiversity including, among others, birds, bats and moths. Dark skies are much appreciated for the enjoyment of star-gazing. 25 years ago it was possible to enjoy sights of the Milky Way which are no longer possible from the edge of Romsey. Artificial lighting is also often used unnecessarily; for example we may see floodlit sports pitches standing unused. Poorly chosen lighting may be wasteful of electricity as well as damaging to the environment. Careful consideration should be given to whether street lighting is necessary in new estates on the edge of towns and in villages.

ECOLOGY AND BIODIVERSITY

POLICY BIO1: CONSERVATION AND ENHANCEMENT OF BIODIVERSITY AND GEOLOGICAL INTEREST

We note that “Development that is likely to result in the loss, deterioration or harm to habitats or species of importance to biodiversity ...either directly or indirectly, will not be permitted unless:

- a) The need for, and benefits of, the development in the proposed location outweighs the adverse effect on the relevant biodiversity or geological interest; and
- b) It can be demonstrated that it could not reasonably be located on an alternative location that would result in no or less harm to the biodiversity or geological interest; and
- c) Measures can be provided and secured (through planning conditions and /or legal agreements) that would avoid, mitigate against, or as a last resort, compensate for the adverse effects likely to result from development.”

This includes such areas as SINC, SSSIs and ancient woodlands, areas which form part of the wider ecological network and wildlife corridors by virtue of their coherent ecological structure or function or are of importance for the migration, dispersal and genetic exchange of wild species.

We are particularly concerned that this policy is not being applied in the allocation of Ganger Farm South as a preferred housing site. Parts of the site include 5 SINC and an area of ancient woodland (also designated as a SINC), plus veteran trees. These are under risk from severance, increased recreational pressure and root disturbance, as well as hydrological effects on the wet woodland.

5.227 Local Nature Recovery Strategies

These are currently under preparation under the leadership of HCC. The Strategy is expected to be completed by the end of 2024. Consequently the local plan cannot be prepared in full without this information. One of the overriding requirements for the Local Nature Recovery Strategy, as discussed at the workshop for Test Valley, was the need for connectivity.

5.228 Conserve and enhance biodiversity

The suggestion is that this could include “things like bird and bat boxes, hedgehog highways and nature friendly planting”. Whilst these may be admirable, they are not enough to maintain broad enough corridors and links for the movement of wildlife, and would only create improvements for a limited range of species.

5.233 – 5.235

“The Council will use planning conditions and /or legal agreements to secure appropriate avoidance, mitigation and compensation measures (including financial contributions) to ensure that biodiversity conservation and geological interests are conserved. If significant harm cannot be satisfactorily addressed in line with the policy requirements, then planning permission will be refused.” We are concerned that this is not always the case. It should be applied in the case of SINC as well as SSSIs. Compensation strategies do not always work; it is important to remember that biodiversity includes a range of animals and plants whose interactions are complicated. For example the loss of a particular pollinator can destroy a plant community which in turn may damage the ecology of another insect species, and hence also bird species.

POLICY BIO2: INTERNATIONAL NATURE CONSERVATION DESIGNATIONS

5.237 – 5.250:

5.244

Mitigation for excess nutrient levels should be limited to the same catchment as that affected. New housing and tourist accommodation in the Test Valley catchment should therefore be mitigated by changes within the catchment.

5.245

A proposed increase in employment land close to Emer Bog is likely to have an adverse effect on the SAC, due to the likely hydrological effects of more built land, and should therefore not be allowed

5.247 - 249 Mitigation packages

The proposal for mitigation packages for recreational impacts to the New Forest must take into account why people go there. The provision of SANG must not result in use of, and damage to, areas designated as SINC or SSSI and should take into account that, for example, people will travel further to go somewhere wilder, such as the New Forest. There are plenty of people who will drive there from London and the Home Counties. The proposed Forest Park situated astride the M27, will not contribute that same sense of wilderness, and will suffer from the effects of noise pollution.

POLICY BIO3: BIODIVERSITY NET GAIN

5.251 – 5.259

It is important that net gain should be a measurable effect and not just a token measure. Connectivity of habitats should be maintained as this is important for allowing the movement of species between sites. Net gain should be a minimum, not an upper limit. Irreplaceable habitats must never be lost.

POLICY BIO4: GREEN INFRASTRUCTURE

5.260

Green infrastructure also includes blue infrastructure. It is important to enable the movement of species between suitable sites. Links must not be severed since mixing of genetic populations is essential to species survival.

5.262

The Local Nature Recovery Strategy document is currently under preparation under the leadership of HCC, and should be completed by the end of 2024. Consequently the local plan cannot be prepared in full without this information. One of the overriding requirements for the Local Nature Recovery Strategy, as discussed at the workshop for Test Valley, was the need for connectivity. See our comments on paragraph 5.227.

5.263

It is important that connections are properly managed in a sustainable way, allowing a measure of “untidiness” which benefits small mammals and insects, for example. The Romsey Waterways Strategy should form a part of the policies of blue infrastructure connections.

POLICY BIO5: TREES AND HEDGEROWS

5.266-7

Whilst the planting of street trees and other new planting is commendable, we would like to see planting for future generations – the planting of species such as oak which are hugely important for biodiversity. Hedgerow oaks are declining because of age and root damage from developments. They are, however, an important part of the landscape character of the hedgerows in areas around southern Test Valley. The planting of replacements in hedgerows, together with careful future management, is vital to maintain this important resource for biodiversity. Oaks are a haven for a colossal 2,300 wildlife species, providing vital spaces to eat, shelter and breed. No other tree species in the UK supports a greater diversity of life than an ancient oak. Care should be taken to source any replacement trees locally or within the UK, to avoid the introduction of pests and diseases.

5.268

Planting of new woodland is highly commendable; however, care should be taken that it is not achieved by destroying other important ecology.

5.270

When considering new developments, care should be taken that trees and woodlands are given enough space to grow and flourish with additional suitable planting on their margins for the future. Woodland margin species are also important in these locations; scrubby willow bushes, for example, are important for woodland butterfly species in their larval and pupal stages. The hazel in the ancient woodland margins and understorey at the Kings Chase South site, for example have evidence of use by dormice, which should be protected.

5.271

Existing native trees should be retained in all but the most exceptional cases; their value for amenity, biodiversity, air quality and mitigation for climate change is irreplaceable. Removal of existing mature trees cannot be immediately mitigated by planting new trees, which take many years to come to maturity.

POLICY HE3: ACCESS TO THE COUNTRYSIDE

This section is looking at the benefits to human health by having access to natural greenspace. It helpfully points out that such access brings about a greater appreciation of nature and its importance.

It does however suggest that circular walks should be around the perimeter of existing settlements. It is important to seek to improve walking links from the centre of settlements out into the countryside. These would improve access to natural greenspace and act as green corridors (albeit narrow ones) for wildlife and should be seen as part of a healthier greener network.

5.292 Enabling access to the countryside and local green spaces through the network of paths and Public Rights of Way (PRoW) has a multitude of benefits, providing opportunities for recreation and exercise as part of an active lifestyle which contributes to good physical and mental health. This also enables an appreciation of the countryside and the natural environment.

5.298 In terms of Circular routes these should be provided on the settlement edge as these are the most well-used routes, connecting people with the countryside or other rural open spaces, longer range routes such as the Test Way and linking settlements. Those PRoW on the edges of settlements often not only provide important recreational activity but also function as commuter routes connecting people to key services and facilities.

POLICY TR1: ACTIVE AND SUSTAINABLE TRAVEL

5.492 This section of the draft local plan refers to the “Local Cycling and Walking Infrastructure Plans” (LCWIP). The plan for Test Valley south was published in 2022.

5.485 – 5.494 This section of the draft local plan is mostly about persuading new developments to provide healthy streets, reducing the need to travel, and provide safe routes for pedestrians and cyclists. “In designing new developments safe and suitable internal layouts and access to the highway network should be provided.” **(5.491)**

This all seems very worthy but as the RIDGE report (Local Plan 2040 Preliminary Transport Assessment January 2024) notes, with respect to the borough generally: “There is an extensive Public Rights of Way (PRoW) network, with urban public footpaths being fragmented and not comprising a comprehensive joined-up walking

network. The Test Valley (south) LCWIP indicates that, with the exception of the Park Lane bridleway, urban PRowS have limited value for cycling, as they do not serve everyday journeys. Within Romsey, the walking & cycling network comprises a mix of footpaths, off-road and on-road cycle routes”.

Unless there is a comprehensive joined-up walking and cycling network throughout the borough, the worthy aims of the draft local plan are useful only within the new developments and thus will not achieve the aims set out in paragraphs **5.485, 5.490 to 5.493 and 5.495**. The LCWIP is mostly “aspiration”. Whilst a cycle path has been established along the A27 between the football ground roundabout and Lee Lane, the comments in the RIDGE report are still true and will remain so with the proposals of the draft local plan.

Furthermore it is not enough that there is a comprehensive joined-up walking and cycling network which serves everyday use. The network must be well maintained so it is safe for walkers and cyclists to actually use. Shared paths must allow for the needs of pedestrians to walk in safety, but also for the safety of cyclists from unpredictable pedestrians and dog leads.

In regard to parking, paragraph **5.507 and Policy TR3**, safe and secure cycle parking should be provided at the ends of the designated primary cycle routes, i.e. close to employment/ shopping/entertainment hubs. Covered cycle parking is needed to encourage use of cycling. For example, in Romsey Town there is little covered cycle parking for those who spend their day working in Romsey and at Romsey Rapids there is no covered cycle parking and only a very few places to leave cycles by the main entrance - often well occupied.

5.489

This section states:

“In rural areas, development should be focussed where residents are able to access local facilities which can help sustain rural villages and settlements.”

Surely this is the wrong way round? It reinforces some settlements which have access to facilities but further impoverishes others that do not. Developments in rural areas should be encouraged to provide local facilities for use by people where at present the facilities are inadequate.

This section of the draft local plan merely refers in passing to public transport but there is no proposal to improve public transport or provide it for communities lacking it.

Please note, that our comments are generally limited to the areas of Southern Test Valley around Romsey. They are also limited mainly to policies connected with the natural environment; further comments may be received from our Planning Committee and should be considered separately.

Yours sincerely

Mrs Elizabeth Pratt

Natural Environment Committee