

SCC Response to Test Valley Draft Local Plan 2040 Regulation 18 Stage 2 Consultation

7. Insert any general comments that do not relate to a specific paragraph number or policy in the general comments box below.*

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

If you are commenting on a document supporting the draft Local Plan (such as a topic paper, or the Sustainability Appraisal), please indicate so.

Southampton City Council (SCC) would firstly like to confirm its continues support for the development of a new and up to date Local Plan for the Borough of Test Valley and recognises the importance of working together to maintain and enhance the interconnectivity of the entire South Hampshire region, as is reflected in our shared commitment to the Partnership for South Hampshire (PFSH).

In terms of this current Regulation 18 Stage 2 consultation, SCC's Strategic Planning Team believes that the Draft Local Plan document responds appropriately to the needs of the Borough and highlights Test Valley Borough Council's (TVBC's) understanding of up to date, local issues in both Test Valley and the wider South Hampshire region. The comments that SCC provide below focus on what are considered to be important cross-boundary issues that may affect Southampton.

Housing Need

SCC notes that TVBC intends to meet its housing needs in full and will not be seeking to export unmet need to neighbouring authorities. SCC welcomes the work that TVBC has undertaken to meet its full housing needs.

SCC has been presented with a challenging housing target, including a 35% uplift as one of the 20 largest urban authorities in England, given the city's tightly constrained boundaries. SCC continues to work on approaches such as increasing density and identifying opportunities for taller buildings in order to meet as much of the city's housing need as possible. If any unmet need is identified SCC will work with its partners at Partnership for South Hampshire, including TVBC, to find an appropriate way forward for resolving this in a future update to the Spatial Position Statement.

Economic Needs

SCC supports the extensive analysis that TVBC has undertaken to identify its need for employment land. SCC notes that in Southern Test Valley the supply of land for B1a/B1b and B1c/B2 uses exceeds the need identified in the evidence base. SCC consider that to 'future proof' the plan, any office proposals in Southern Test Valley that would lead to an overprovision against assessed need, or an agreed target for the Borough for a particular phase of the plan, should be subject to a sequential assessment of whether there are any sites in Southampton city centre. With regards to B8 development, the highly built-up nature of Southampton makes it exceedingly difficult to identify new large-format warehouse sites within the city. SCC welcomes any and all efforts made by TVBC to bring forward new sites for B8 development and the contribution this will make to supply in the South Hampshire region.

Transport

SCC adopted its Local Transport Plan, Connected Southampton 2040, in 2019 and this sets the long-term transport strategy for the city with a vision to make Southampton a modern, liveable and sustainable place to live, work and visit by investing in better and more innovative transport. The approach, which is mirrored in the Transport for South East (TfSE) Strategy, is to look at connections and corridors from Southampton into the surrounding City Region.

The most relevant to Test Valley are:

- Connects through a high-quality public transport system that provides a high-quality 'Metro' level of service connecting places and communities together with the City Centre and economic drivers – this includes future Mass Rapid Transit (MRT) routes to Romsey;
- High-quality segregated cycle routes that connect the city with Hampshire to reduce severance due to the M27 and M271;
- Use Travel Plans, Travel Demand Management and Delivery Service Plans and associated behaviour change programmes to encourage active, clean and healthy travel; and
- Develop sustainable patterns and forms of new development in areas around Southampton that are designed to be well-served by public transport and cycle network to increase the number of people coming into the city but not the number of car trips.

To meet the above, SCC supports TVBC's approach of allocating strategic sites on the grounds that these can often cater for higher density development, particularly when close to existing and future public transport nodes and facilities, and can be more viable to incorporate into existing and future bus networks. Such sites also tend to be better places to deliver more practical items of sustainable transport infrastructure such as coherent and direct cycle corridors with safe and segregated cycle, walking & wheeling facilities (that meet current design standards) rather than just small sections of cycle route.

SCC declared a climate emergency in 2019 and recognises that transport is one of the most significant contributors to carbon emissions that has the potential to be influenced by policy and decision making at the local government level. Transport emissions are also a significant contributor to poor air quality and this is also a significant issue in Southampton. There are strong travel movements between Southampton and the southern part of Test Valley for work – around 4,700 daily trips in each direction between the authorities. Recognising that a number of residents of Test Valley may at some time wish to travel into Southampton for work, education or leisure purposes (and that there are movements from Southampton to Test Valley), SCC would encourage TVBC to incorporate all possible approaches that would lead to a more sustainable transport future.

For example, SCC is of the view that due to poor air quality and climate change, it is important that electric vehicle charging points (and ideally other alternative fuel provision as well) are fully designed into new developments and not an after-thought. Whilst the requirement for electric vehicle charging points for new homes is now addressed through Part S of Building Regulations, SCC believes this need should still be explicitly recognised in the emerging Local Plan to prevent design issues.

SCC also supports TVBC's ambitions to incorporate more dwellings into its town centres and would strongly encourage high-quality, high-density developments near to transport nodes such as train or bus stations, high frequency bus routes, cycle corridors, and other key interchanges. Developments that focus on reduced car dependency, or even be car-free, should be a key feature of such higher density developments where they are in sustainable locations. This would help reduce pressure on the transport network, reduce emissions and reflects technology trends where ideas such as Mobility as a Service will become increasingly important.

Potential Areas of Knowledge Sharing

In the spirit of collaboration, SCC's Transport & Planning Service is always keen to share knowledge and understanding with its counterparts in neighbouring authorities and the wider South Hampshire region. This does not just need to be limited to areas of cross-boundary issues under the Duty to Co-operate but should also extend to other areas of expertise a particular local authority may develop.

SCC has been making significant strides forward in the realm of digital planning through successful bids to the Department for Levelling Up, Housing and Communities (DLUHC) PropTech fund. This includes development of digital engagement and mapping tools. With the Levelling Up and Regeneration Act 2023 seeking to introduce a more digital planning system, SCC would be delighted to share our learning so that TVBC can meet future requirements in this field.

SCC already works closely with Hampshire County Council on cross-boundary strategic transport planning and would welcome working with TVBC on cross-boundary transport issues.

SCC's new Local Plan, known as the Southampton City Vision, has sought to take a more holistic approach to health in recognition of the many different impacts, both positive and negative, that the built environment can have on health. It is clear that TVBC recognises these impacts as they are set out in the accompanying Health Impact Assessment but these impacts and linkages could be made more explicit in the plan itself. This could be achieved in the supporting text or even better in a strategic health and wellbeing policy. SCC would be happy to discuss our learnings in this field with TVBC.

The testing of the transport implications of the Local Plan need to consider the impact on Southampton given the connections and relationships between the authority areas. We would support an approach that reflects our position above and reduces the level of car-based trips while increasing the people trips into the city.

8. Insert any specific comments in the general comments box below, indicating which paragraph, policy or matter your comments relate to where possible.*

If you are suggesting a change is needed to the draft Local Plan or supporting document, it would be helpful if you could include suggested revised wording.

Southampton City Council (SCC) has focused its comments below on what are considered to be important cross-boundary issues that may affect the city.

Southern Area Policy 6 (SA6): Land at Velmore Farm

SCC note this proposed allocation sits within land that currently forms part of the local gap between Southampton and Eastleigh/Chandlers Ford. SCC considers this gap to be an integral means of protecting the separate identities of these settlements. However, noting the sustainable location of this site in terms of its access to employment, local amenities and public transport links; and the retention of the woodland to the south, which would continue to constitute a clear and permanent gap; SCC, on balance, do not object to this allocation.

SCC supports the inclusion of a 'significant green space' in the south-west corner and along the southern edge of the proposed allocation to provide further mitigation for the reduction in the size of the local gap.

SCC anticipates that a number of future residents may work in Southampton or want to visit for leisure purposes. Consequently, SCC would encourage a requirement for sustainable transport measures to be included in the allocation – including connections from the site to the cycle and bus network on Bournemouth Road. This would help reduce the number of private car journeys being made into Southampton and alleviate congestion and vehicle emissions experienced on arterial routes such as the A33, which would be the main route into the city from this allocation. Measures could include a Travel Plan, facilities with the development that reduce the need to travel, the provision of means to access the bus stops on Bournemouth Road adjacent to Hampshire Corporate Park, and the provision of cycle routes to connect to the improved strategic cycle network route, known as Southampton Cycle Network 5 (SCN5), on Bournemouth Road that links Southampton with Chandler's Ford.

Southern Area Policy 8 (SA8): Land at Upton Lane

SCC considers developing the Land at Upton Lane to be a logical extension of built form given it is bound between the M27, M271 and A3057. SCC's primary concern would be around any increase in traffic flows into Southampton such as from residents of the indicative housing land travelling into the city for work or leisure and residents of Southampton travelling to the site for work. The main roads into the city from this proposed allocation, namely the M271 and A3057, suffer from congestion at peak times.

Therefore, SCC would expect to see sustainable transport measures built into the proposed allocation to ensure there are reliable alternatives to the private car. This could include measures to connect to the strategic cycle network route, known as Southampton Cycle Network 3 (SCN3), that will link Southampton and Romsey via Nursling, and support improvements to the frequency of the bus services including future MRT.

Southern Area Policy 14 (SA14): Land at Adanac Park, Nursling

Adanac Park is a major employment location that due to its close proximity to the Southampton city boundary provides significant employment opportunities for Southampton residents. SCC therefore welcomes the intention to continue to protect the remaining undeveloped land at Adanac Park for employment uses and the intention that development of such land must be to a high design standard. This will help ensure Adanac Park continues to be recognised as a premier business location on the south coast.

Continued engagement with businesses and Travel Planning should be a key requirement as well as facilities to connect to SCN2 to link to Southampton Central Station and SCN4 to Southampton General Hospital, and support improvements to the frequency and hours of the bus services to Adanac Park.

Adanac Park has been a long-term aspiration for a Park & Ride facility and service to Southampton City Centre. Land has been allocated for Park & Ride which has been in part delivered through the NHS development. However, further expansion and operation to Southampton is still required and should be referenced.

Southern Area Policy 16 (SA16): Forest Park

SCC welcomes the allocation of the wooded areas adjacent to the M27 as a Forest Park. The policy rightly points out this is a green infrastructure asset of sub-regional importance and will provide

access to green space for not just Test Valley residents but also those from Southampton, and Eastleigh as well. SCC welcomes measures in the policy to improve access whilst protecting biodiversity. Given the ongoing need to provide strategic mitigation for recreational impacts to the New Forest, the Forest Park could operate as a strategic mitigation site and SCC would welcome the opportunity to work with TVBC and partners on this opportunity.

The Forest Park will provide opportunities for active travel – primarily for leisure but also trips to work – for residents of Southampton. Integrating the walking, wheeling and cycling routes to the SCN and local paths will be important to ensure new corridors are created – for example connecting Lordshill (an area of deprivation) with Chilworth as an employment area. This complements the improvements SCC are making to the Outdoor Sports Centre as a regionally important facility.