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Enquiries to Emily Howbrook

My reference

Direct Line [Redacted]

Your reference

Date 2 April 2024

E-mail [Redacted]

For the attention of Clare Roberts

Dear Sir,

**Test Valley Borough Council Local Plan 2040
Regulation 18 (stage 2) Consultation**

Thank you for consulting the County Council on the Draft Local Plan 2040.

The County Council provides a response in its capacity as the Local Highway Authority (including public rights of way), Local Education Authority, Minerals and Waste Planning Authority, Lead Local Flood Authority, and as a Public Health body, responsible for ensuring the health and wellbeing of Hampshire's population as a key stakeholder in the planning process. The detailed comments can be found appended to this letter.

The County Council has recently adopted a new Local Transport Plan (LTP4). This sets out the vision intended outcomes, guiding principles and policies for planning and delivering transport in Hampshire in the period up to 2050. Key objectives within this document are the encouragement of modal shift, decarbonising the transport system and the need to plan more effectively for people and places.

Should you have any queries or wish to discuss this further, please do not hesitate to contact Emily Howbrook using the details at the top of this letter.

Yours sincerely,

[Redacted]
Emily Howbrook
Strategic Planning Manager
Hampshire 2050

Director of Hampshire 2050
Gary Westbrook

APPENDIX 1

Detailed Hampshire County Council Comments on the draft Local Plan Policies (Test Valley Stage 2 Reg 18)

Section/ policy	Comment/ suggestion
Evidence Base p,10	<p>The Joint Strategic Needs Assessment (JSNA) hwww.hants.gov.uk/socialcareandhealth/publichealth/jsna provides useful evidence to further strengthen and support your policy ambitions and outcomes. Sections on Healthy Places and Healthy Settings are of relevance within the Local Plan.</p> <p>It is recommended that a full Health Impact Assessment (rather than a Rapid HIA) is carried out in due course to take account of what changes in the demographics of the population such as an ageing population, will have implications for the local economy, housing and health infrastructure, and on the viability of local services to ensure changing needs are met.</p>
Objectives p.19	<p>A health and wellbeing policy framework that flows through all policies and links together various place-based ambitions, would demonstrate a positive drive for all new development and planning proposals to consider health and wellbeing as a key outcome. The Local Plan could usefully include a headline priority policy or vision around health and equity. Examples of local plans which include such strategic policies can be provided if this would be helpful.</p>
Chapter 3: Spatial Strategy	<p>The Local Plan would support development that supports health, equity and wellbeing. A key suggested aim for the Borough's spatial strategy and its communities:</p> <p><i>Our health and wellbeing is shaped by much more than just our health care. The places we live in affect our health in countless ways, including through the way a neighbourhood is designed, access to green spaces and the provision of active travel choices.</i></p> <p>The local plan and its policies are a key tool in delivering this ambition.</p>
SS3 Housing Requirement p45 (Northern Test Valley)	<p>Given its proximity to both the draft strategic allocation and the allocated site at Land North of Goch Way for approximately 50 dwellings (Policy CNP2 in the Charlton Neighbourhood Plan), the County Council can confirm that Grazing Land at Charlton (SHELAA 2024 Ref. 242) is available should there be a requirement for additional housing land in the Northern Test Valley Area, or as part of a review of the Charlton Neighbourhood Plan.</p>

Section/ policy	Comment/ suggestion
Test Valley Communities (allocations) chapter 4 page 60	<p>The County Council encourage a health impact assessment (HIA) to be included as requirement of larger developments set out in chapters 3 and 4 of the Plan.</p> <p>To address planning for health, sites should seek to consider the 10 indicators of Healthy Streets (see LTP4) and healthy design principles as set out within Building for Healthy Life.</p>
Climate change p.124	<p>There are many cross-cutting themes that align with Hampshire's Public Health Strategy 2023-2026 in particular those focused on healthy places and settings. It is positive to see this strategy referenced in the climate change chapter of the report.</p>
CL1: Countering Climate Change	<p>Suggest making more explicit link to climate change and health within this policy. The impacts of climate change are likely to disproportionately impact those in the most deprived areas. When thinking about planning policy it would be good to consider the co-benefits of policies that tackle both.</p>
Flood Risk (evidence) p131	<p>The Level 1 Strategic Flood Risk Assessment (SFRA) (dated February 2024) has not been endorsed by the Environment Agency or the County Council (in its capacity as Lead Local Flood Authority) prior to the Regulation 18 Local Plan consultation.</p> <p>As part of this consultation, the County Council has only reviewed the Level 1 SFRA considering its impact on Policy CL2 – Flood Risk. The County Council would appreciate an opportunity to comment on this document more fully, as a document of this depth and importance requires a detailed and time-consuming review.</p> <p>The recommendations section of the SFRA (chapter 7) has not identified local flood risk pressures that affect Test Valley and would require the local flood policy to go above the National Planning Policy Framework (NPPF) baseline. This is unfortunate as it is one of the roles of a Level 1 SFRA. Whilst the flood policy seems reasonable, the County Council cannot confirm that it meets the local flood risk needs of the borough due to the issues around the recommendation section in the SFRA.</p> <p>The Technical Guidance to the NPPF paragraph 7 states: <i>'Local planning authorities should use the Strategic Flood Risk Assessment to inform their knowledge of flooding, refine the information on the flood map and determine the variations in flood risk from all sources of flooding across and from their area. These should form the basis for preparing appropriate policies for flood risk management for these areas.'</i></p> <p>The County Council note that a Level 2 SFRA has not been produced.</p>

Section/ policy	Comment/ suggestion
	<p>Some of the housing site allocations (e.g. Land South of Ganger Farm, Romsey; Land South of the Bypass, Romsey; and Land at Velmore Farm) have been identified by the County Council as having areas of surface water and groundwater flooding and in some cases small areas of Flood Zones that may impact on the amount of the site that is developable. A Level 2 SFRA is therefore recommended.</p> <p>The County Council recommend that the Borough Council look at all of the site allocations and, if there is flooding on the site from any source, consideration should be given as to whether a level 2 SFRA is needed to demonstrate that it can be developed safely.</p> <p>The Borough Council has clearly already excluded sites in the Flood Zones. However, the NPPF (paragraph 167) and supporting guidance now state that all sources of flooding should be considered:</p> <p>NPPF paragraph 169 and 170 states:</p> <p><i>'If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied.'</i></p> <p><i>'The application of the exception test should be informed by a <u>strategic or site-specific flood risk assessment</u>, depending on whether it is being applied <u>during plan production</u> or at the application stage.'</i></p> <p>Level 2 SFRAs are now triggered by all sources not just the Flood Zones. How to prepare a strategic flood risk assessment - GOV.UK (www.gov.uk)</p> <p>The Hampshire County Council's Site Allocation SuDS Land Take Calculator can be used to quickly produce a high-level estimate of the developable area of the site and can even take account of the area within the Flood Zones and other sources of flooding.</p> <p>https://documents.hants.gov.uk/flood-water-management/SiteAllocationSUDSIandtake-calculator.xlsx.</p> <p>If this is not possible then a more detailed level 2 SFRA may be needed. The County Council is happy to provide advice and support on this technical work.</p> <p>The County Council note that no Sequential Test has been provided to support the Local Plan. It is understood that the Borough Council will prepare a statement in respect of how the Sequential Test for flood risk has been applied, as part of the evidence base for the Regulation 19 Local Plan consultation. The County Council recommend that this Sequential Test work should be done in accordance with Planning Practice Guidance on Flooding and Coastal Risk and specifically Diagram 2.</p>

Section/ policy	Comment/ suggestion
CL2 Flood risk p.134	<p>This policy covers the basic requirements of the NPPF. The County Council is pleased to see that this policy encourages buffer zones to be provided along watercourses (part I). It is noted that part I) has not come from the level 1 SFRA but we would strong support this element of the policy.</p> <p>Part j) states <i>'Priority is given to natural flood management and drainage approaches</i>. Drainage approaches is a vague term and could refer unsustainable, hard engineering approaches. For clarity reasons please change <i>'drainage approaches'</i> to <i>'Sustainable Drainage Systems'</i>.</p>
Local Plan Monitoring Framework- CL2	<p>The County Council also note that the monitoring of this flood policy only considers objections from the Environment Agency and not the Lead Local Flood Authority (LLFA). Given that there are elements of this policy that fall within the remit of the LLFA to comment on it will be necessary to consider the LLFA objections as well to fully monitor the entire policy.</p>
CL3: Sustainable Buildings and Energy Use	<p>It is role as a public landowner and service provider, the County Council builds and deliver facilities such as schools and specialist accommodation. Different energy standards across plan areas could create inefficiencies within the building and development industries, and impact on the delivery of such schemes. The County Council therefore recommends that local energy efficiency standards are aligned with the national standards to be effective and sound.</p>
COM1: Delivering Infrastructure	<p>The County Council has published guidance on Planning Obligations and Developer Infrastructure Contributions as a basis for identifying necessary on-site and other infrastructure which may be sought. The County Council seeks financial obligations towards education infrastructure and has indicated what increased school capacity may be necessary to support the site allocations in the chapter 4 comments. Where new or expanded schools are required to support planned growth, the County Council will in most cases seek to ensure development proposals are supported by a commitment to fund an accredited School Travel Plan.</p>
COM2: Community Services and facilities p.150	<p>The County Council has an on-going need to review and, if necessary, rationalise surplus facilities as part of wider strategies to improve services, implementing a series of service-driven improvements, covering both frontline and support services. This may sometimes result in the 'necessary loss' of community facilities in County Council ownership, to reinvest proceeds of sale in local service improvements.</p> <p>The County Council's service improvement programmes have strict timeframes and budget funding, and it is helpful that the mandatory 12-month marketing exercise only applies to local shops or public houses</p>

Section/ policy	Comment/ suggestion
	<p>– a 12 month delay would cause additional delay and costs which could directly impact on the delivery of the public services.</p> <p>However, it would be helpful to provide sufficient flexibility in COM2 to accommodate the unique role and function of public service providers and their need for managed change, which would bring the draft policy in line with the supporting text for existing Policy COM14: Community Services and Facilities (paragraph 5.141) (in the current adopted Local Plan).</p> <p>The County Council proposed the following amendments to the draft policy wording:</p> <p>Development involving the loss of cultural and community facilities and places of worship will be permitted if it can be demonstrated that;</p> <p>...</p> <p>d) Following engagement with the local community and potential users of the space that there is no longer a need for that facility for its existing use or another community use; or</p> <p>f) The building can no longer provide suitable accommodation; <u>or</u></p> <p><u>g) The proposals form part of a public service provider's plan to re-provide or enhance local services, or the proposal will clearly provide sufficient community benefit to outweigh the loss of the existing facility, meeting evidence of a local need."</u></p>
<p>Policy HE2: Existing Open Space</p>	<p>The County Council request that this policy reflect the role and function of public sector land, specifically the role the disposal of surplus land within school sites, including school playing fields can be used to support improvement to education services. Section 77(1) of the School Standards and Framework Act 1998 and Part 1 of Schedule 1 to the Academies Act 2010 provides a robust justification for this approach. The emerging policy should be amended to allow sufficient flexibility to secure future improvements to education facilities, and it is made clear that school playing fields should not be included within the scope of this policy.</p> <p>This will then mean that the policy will potentially provide the flexibility that the County Council may require to justify the loss of school playing fields when it forms part of the County Council's operational plans for funding education improvements during the Plan period, and planning for a sufficient choice of school places to meet the needs of existing and new communities.</p> <p>The County Council requests that any emerging open space policy should include an additional clause in the policy:</p> <p><u>Surplus land within school sites, including school playing fields are excluded from this policy.</u></p>

Section/ policy	Comment/ suggestion
	<p>The County Council also recommend including a footnote or reference in the new clause to: <u>As per Section 77(1) of the School Standards and Framework Act 1998 and Part 1 of Schedule 1 to the Academies Act 2010</u></p>
BIO4: Green Infrastructure	<p>Active travel, physical activity and time spent in nature are all linked to good physical and mental health.</p> <p>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 (also relevant to policy CL2).</p>
HE1-3 Health, Wellbeing and Recreation	<p>This policy is mainly focused on formalised space provision and access/recreation rather than health and wellbeing. More focus on health benefits and outcomes is suggested.</p> <p>Consider open space quality as well as quantity. It is suggested that the following aspects of quality are embedded: accessibility and inclusion; safe spaces for women and girls; play and hang out space for children and young people; age-friendly spaces.</p>
HE3 Access to countryside	<p>Suggest the addition of greenspace especially those in towns centres or communities where access to the countryside is limited and may depend on car ownership. This access should be equally balanced across all needs and access to transport.</p>
DES1: Delivery of Sustainable and High-Quality Design	<p>Policy should include more emphasis on design for people-led outcomes around health and wellbeing, and consider inclusion of the following design principles to ensure that developments are of the best quality to promote good health, wellbeing and reduce inequalities: The 10 Indicators of Healthy Streets as set out within the LTP4: and Building for a Healthy Life Assessment.</p> <p>With regard to point H, the County Council would recommend altering the wording so it is clear that the masterplan, design and access statement <u>and</u> design code are all required to support major developments. Design and access statements and design codes do not achieve the same outcome. The design and access statement is intended to support the application process whereas a design code as more weight and can be enforced post decision.</p>
DES 2: Design Details and Considerations	<p>Suggest including specifications for internal space standards private outside space for flats and apartments. This wording could also be picked up in policy <i>Policy HOU6</i>.</p>

Section/ policy	Comment/ suggestion
	<p>Links to greenspace provision and proximity and ease of access should be key for all housing within a development. Also, to consider landscape proposals as having a climate resilience purpose beyond the sometimes solely decorative, screening or buffering effect used by some developments.</p>
<p>HOU1 Affordable Housing p.202 Para. 5.365-6</p>	<p>The County Council has a statutory duty to ensure that there is diversity and quality in the supply of care providers so that there are enough high-quality services for eligible people to choose from. In response to demographic change, the County Council is undertaking an ambitious Extra Care Housing programme to allow older adults to maintain independence in a home of their own. Further information explaining the County Council's approach to identifying opportunities to deliver Extra Care housing can be found on its website here: Extra-Care-Older-adults-Brochure-2022.pdf (hants.gov.uk).</p> <p>The County Council has commissioned a Service Demand and Needs Study for affordable adult extra care housing in Hampshire. The County Council's Strategic Commissioning Lead for Older Adults Extra Care Housing would welcome opportunity to meet with Borough Council Planning Officers to discuss the identified affordable older persons housing needs further once this report is available. This is likely to support the text in para. 5.365 that the inclusion of an element of specialist residential accommodation and facilities for older people within the affordable housing provision may be appropriate depending on the proposal.</p> <p>Suggested amendment to para 5.365 to include supported/specialist housing that is not just for retirement as follows:</p> <p>'Proposals which include the provision of extra care accommodation, assisted living, <u>or other form of retirement or specialist</u> housing [...]'</p> <p>Paragraph 5.366: 'pepper-potting' affordable provision with the market housing would not be appropriate for an affordable Extra Care housing scheme. Affordable Extra Care requires a minimum number of units (min 60 units) to be built in a block to be economically viable and managed which makes pepper-potting with market housing within the building unachievable. Suggest amending text to account for the flexibility required in terms of the accommodation schedules for proposed blocks of affordable Extra Care scheme.</p>
<p>HOU2, HOU3 and HOU4</p>	<p>Suggest considering a cross link to policies DES1 and DES2 with the consideration of building for healthy life, healthy streets, lifetime homes and space standards to be incorporated into these developments. Living in an overcrowded household is associated with worse health outcomes. Inclusivity has been highlighted as a vision for the local plan and seeking homes that aim to address this issue will aid in not worsening health inequalities.</p>

Section/ policy	Comment/ suggestion
HOU5: Provision of Housing to Meet our Needs	Where specialist housing provision is required for older adults, the recommendation is to include reference to the HAPPI inclusive design principles: HAPPI - Design - Topics - Resources - Housing LIN . Adaptable homes benefit older populations and also support families of all ages through life changing events and poor health. This will enable people of all abilities to continue to live in a community of their choice. This is particularly important as the older population grows, as referenced by the Borough Council and within the JSNA.
HOU6: Residential Space Standards	It is suggested that the wording for the inclusion of Part M4(3)A and Part M4(3)B, which states 'where there is demonstrable need in the local area' be revised. Rather, this should be considered the default position unless there is demonstrable evidence that this is not required.
TR1: Active and Sustainable Travel	<p>Policies related to health and wellbeing, carbon reduction climate change, healthy streets, site allocations and inclusivity would usefully be strengthened by reference to the LTP4. In this regard the aims of TR1 should be expanded to embrace these strategic objectives.</p> <p>Sustainable modes of transport and the needs of pedestrians and cyclist: This wording could be strengthened by incorporating the hierarchy of transport so that 'walking and wheeling' modes are prioritised. 'Wheeling' represents the action of moving as a pedestrian, whether or not someone is walking or wheeling unaided or using any kind of wheeled mobility aid, including wheelchairs, mobility scooters, walking frames, prams or buggies.</p> <p>Policy should include the 10 indicators of healthy streets design principles as a point of reference for developers in line with the now adopted LTP4. What is Healthy Streets? — Healthy Streets</p>
TR2 and TR3 Impacts and Parking	Emissions from transport are harmful to human health and their reduction could be referenced in more detail within this policy aim. Reference to health is recommended within this policy and demonstrating the link between physical activity, physical and mental health. The-role-of-active-travel-in-Improving-Mental-Health.pdf (healthyplacemaking.co.uk) The framework created in policy TR2 should form a related point in policy TR3, whereby parking can be reduced if successful and robust methods are set out within the transport plan. At present this is not clear in the wording of the policies. LTP4 underpins that reduced parking need brings benefits for quality of public realm, better healthy travel choices, reduced climate impacts and lower population health impacts from emissions, as such should form part of this policy balance.
EC1: Retention of employment land/ sites p.225	The County Council request that the emerging Policy EC1 provides sufficient flexibility to accommodate the unique role and function of public service providers and their need for managed change.

Section/ policy	Comment/ suggestion
	<p>In addition, it would be helpful for there to be clarity as to whether the requirements c) and d) are both required, or whether one of the requirements is applicable only.</p> <p>Propose the following amendments to the draft policy wording:</p> <p>a) the land is no longer required to meet economic development needs of the area; or</p> <p>b) continued use of the site for employment use is no longer commercially viable; or</p> <p>c) the current business activity is causing, or could cause significant harm to the character of the area or the amenities of residents; <u>or</u></p> <p>d) it would not have a significant detrimental impact on the operation of the remaining occupiers of the site; <u>or</u></p> <p><u>e) the loss forms part of a public service provider's programme that necessitates the loss, in line with the Local Government Act 1972 (General Disposal Consent 2003)."</u></p> <p>The County Council note the recent changes to permitted development rights introduced by the government under Class MA of Part 3 of Schedule 2 of the General Permitted Development Order 2015. This allows Class E (commercial, business and service) to be converted to Class C3 (dwellinghouses) subject to certain restrictions and prior approval. The County Council recommend that the supporting policy text of draft Policy EC1 should acknowledge and reflect the national legislation to provide clarity in guiding development proposals and planning applications.</p>
Appendices	
Appendix 3 page 251	<p>In addition to inclusion of consideration of the Minerals Consultation Area as a general requirement, wording should be added to the supporting text of the applicable allocated site policies to reflect the presence of potential mineral resources and the need to investigate these. See comments on Chapter 4.</p> <p>It would also be prudent to add reference to Policy 16 (Safeguarding – mineral infrastructure) and Policy 26 of the Hampshire Minerals and Waste Plan to the Minerals and Waste section of Appendix 3. Further information on minerals and waste safeguarding is available in the adopted Minerals and Waste Safeguarding in Hampshire SPD:</p> <p><u>Minerals and Waste Safeguarding in Hampshire Supplementary Planning Document.</u></p>
Omissions	
Infrastructure safeguarding	<p>There is no mention of safeguarded minerals and/or waste infrastructure in the Draft Local Plan. Further advice can be provided if that would be of assistance.</p>

Section/ policy	Comment/ suggestion
Designing for inclusivity	<p>The ambition around inclusion should be enhanced and strengthened, for example in the following areas: areas of deprivation and greatest need; women and gender bias in planning; children and young people outside the narrow focus of play; environments for an ageing demographic; space for more vulnerable groups and provision for women and girls.</p> <p>For example, paragraph 5.277 has an opportunity to nurture intergenerational communities and inclusion, but as currently written suggests older residents will require different spaces to other parts of the community, which is not necessarily the case.</p>
Site allocations: general	
Surface water drainage	<p>Some sites do not have clear options to drain surface water to, which is required to make the site viable. This could be to a watercourse, surface water sewer or via infiltration. Viable infiltration cannot be assumed but must be demonstrated by infiltration tests and groundwater monitoring. If there is not a backup alternative option for them to drain to, either a watercourse or surface water sewer, then the County Council strongly recommend that the site should not be allocated before a possible option for drainage the site has been established.</p> <p>Please see the County Council's guidance on this for more advice: https://documents.hants.gov.uk/flood-water-management/HCC-CMP-Local-Plan-Guidance-Final-for-publishing-v2.pdf</p> <p>Some sites are in Catchment Management Plan priority areas where stricter drainage strategy requirements will apply: (Land Adjacent to Abbey Park Industrial Estate, Romsey and Land South of Botley Road, Romsey).</p>

Chapter 4: Proposed strategic housing and employment sites (County Council comments)

Local Plan section / policy	Comment/suggestion: Land South of Ganger Farm, Romsey
SA4 p.99	The site is over 3ha in area and lies almost wholly within the Minerals Safeguarding Area. Suggested additional supporting text wording: <i>Applicants should aim to maximise the prior extraction of mineral resources on this site, in line with the policies of the Hampshire Minerals and Waste Plan. A Mineral Resource Assessment is required to be submitted to the Minerals Planning Authority as part of any application to develop this site.</i>
Transport (criterion f)	Access to the site via sustainable and active modes should be considered within the policy to ensure safe and attractive connections to existing residential areas and facilities. Suggest adding the following criterion: "f. The provision of high quality active travel infrastructure to provide links through the site and safe walking, wheeling and cycling connections to existing facilities and services".
Infrastructure requirements (PROW) (IDP p.60) (Draft Local Plan 2040 p. 98-100)	<p>There is currently outline planning application (Ref: 23/00694/OUTS) for 309 dwellings on the central part of the site yet to be determined, and planning application reference 23/02407 has been determined for EIA opinion for 280 dwellings. This scheme includes for a permissive shared cycleway between the site and A3090 to the south, linking the A3090 with existing walking and cycling routes along the west end of Jermyns Lane. There are no public rights of way across the site.</p> <p>Provision of a new Bridleway across the site north-south linking Jermyns Lane with the A3090 (including road crossing) would give a largely off-road route into the town centre along Halterworth Lane, existing paths through Tadburn Meadows and Romsey Footpaths 3 and 4. It may also facilitate a route from Romsey to Ampfield via Ampfield Wood and to Crampmoor and service roads parallel to the straight mile.</p> <p>Ampfield Wood (Forestry Commission) is a large area of open access (including FP and BW) within 500m of the development site and is very popular. Use has increased since Abbotswood and Ganger Farm were built; this development will increase demand again.</p>

Local Plan section / policy	Comment/suggestion: Land South of Ganger Farm, Romsey
	<ul style="list-style-type: none"> • There is a need for parking (no formal car park at present), for surfacing many of the paths, for dog bins and for information boards with maps and guidance; suggest early discussion with Forestry Commission. • The road is relatively narrow, busy (including a bus route) and has no footway on the approach to the woods; there will be a need to provide an off-road path for non-motorised users and possibly a formal crossing; this was recorded in the Countryside Access Plan research: <i>“Provide pavement along length of lane - dangerous rat run”</i>. The County Council own land next to the highway (Jermyns Lane) which could assist. • Should Forestry Commission be willing, there is an excellent opportunity to create cycle routes through to Ampfield and via existing bridleway to the lanes to the north. Countryside Access Plan research gives request for this as <i>“Link avoiding A3090 from N Romsey to the bridle path in Ampfield Wood and on to the quiet roads around Upper Slackstead”</i>. <p>Also demand for non-motorised user path to link through south part of the site to the service roads which parallel the straight mile.</p> <p>Other well-used areas nearby are the canal, Tadburn meadows and the ford near the railway line.</p> <p>Two additions are requested in accordance with IDP SA4:</p> <ul style="list-style-type: none"> • <i>“Provision of a new Bridleway or Public share active travel route across the site north-south linking Jermyns Lane with the A3090 (including road crossing).”</i> • <i>“Contributions towards access to and enhancement of Ampfield Wood”</i>.
Site requirements- Education	<p>The catchment secondary school is the Romsey Academy. To mitigate the planned growth, applicants will be expected to contribute towards enhancing education capacity in accordance with Policy COM1- contributions towards Romsey Primary School & The Romsey Academy, recognising that significant secondary education needs are met for pupils outside the Local Education Authority’s boundary currently. Potential requirement to expand in the existing maintained nursery unit to meet the early years needs from the site.</p>

Local Plan section / policy	Comment/suggestion: Land South of Ganger Farm, Romsey
	Shared cycle footway links would need to be provided linking to the Cupernham Schools, as they are located within an estate with limited areas for parking of those parents that need to drive to school. Consideration should be given to funding measures for a school street on Bransley Close.

Local Plan section / policy	Comment/suggestion: Land South of the Bypass, Romsey (110 dwellings)
SA5 p.101 (supporting text)	The site is over 3ha in area and lies almost wholly within the Minerals Safeguarding Area. Suggested additional supporting text wording: <i>Applicants should aim to maximise the prior extraction of mineral resources on this site, in line with the policies of the Hampshire Minerals and Waste Plan. A Mineral Resource Assessment is required to be submitted to the Minerals Planning Authority as part of any application to develop this site.</i>
Site requirements- Education	<p>The catchment secondary school is the Romsey Academy. To mitigate the planned growth, applicants will be expected to contribute towards enhancing education capacity in accordance with Policy COM1- contributions towards Romsey Primary School & The Romsey Academy, recognising that significant secondary education needs are met for pupils outside the Local Education Authority's boundary currently. Potential requirement to expand in the existing maintained nursery unit to meet the early years needs from the site.</p> <p>Safe and active travel to school will need to be facilitated by provision of a crossing point on Bypass Road. A new school travel plan would be required to ensure active and safe travel for new residents to both schools.</p>
Transport	<p>Policy DM2(h) of LTP4 states that the Local Highway Authority will only support new accesses onto A roads where the strategic flow of traffic is prioritised and all other reasonable option have been considered. Suggest amending criterion b:</p> <p>"b. Access to the development via A27/ A3090 (Bypass Road), where it can be demonstrated the strategic flow of traffic is prioritised".</p>

Local Plan section / policy	Comment/suggestion: Land South of the Bypass, Romsey (110 dwellings)
	<p>Access to the site via sustainable and active modes should be considered within the policy to ensure safe and attractive connections to existing residential areas and facilities. Suggest adding the following criterion:</p> <p>“g. The provision of high quality active travel infrastructure to provide links through the site and safe walking, wheeling and cycling connections to existing facilities and services”.</p>
<p>Infrastructure requirements (PROW)</p> <p>(IDP p.63)</p> <p>(Draft Local Plan 2040 p.101-103)</p>	<p>Romsey Extra Footpath 503 runs the length of the eastern boundary of the site; its definitive width is 2 metres.</p> <p>Romsey Extra Footpath 503 is an important link between the town centre and the leisure centre, and is tarmacked, with a lit pedestrian crossing of Bypass Road at its northern end. The development will increase use of this path both to the Leisure centre and the town centre. There is a strong demand for cycle use of this path; it is anticipated that Highways colleagues will seek to provide an off-road shared use pedestrian/cycle route in the verge of Bypass Road to the west of the site. FP503 would form the final section of this route.</p> <p>The County Council is holding claim 1251 to add the old Southampton Road (which lies just west of the site) to the Definitive Map of Rights of Way; should this come under the same landownership as the development site then a discussion would be welcome at an early stage.</p> <p>Provision of a non-motorised path linking Bypass Road and the leisure centre, on or parallel to Romsey Extra Footpath 503, to be of sufficient width and in a green corridor, in accordance with IDP SA5. Provision of or contribution of off-site enhancements, potentially including resolving claim for modification of the Definitive Map to add north-south routes between Bypass Road and Lee Lane.</p> <p>Comments can be provided on site specific considerations at this time should they be of assistance.</p>

Local Plan section / policy	Comment/suggestion: Land at Velmore Farm
<p>SA6</p> <p>Transport</p> <p>(criterion g)</p>	<p>Given the outputs of the strategic transport modelling that has been undertaken to inform the Preliminary Transport Assessment, the Local Highway Authority would expect further detailed assessment to be undertaken to demonstrate the impact that the proposed development is likely to have on Templars Way and the adjacent road network (including roads in neighbouring Eastleigh Borough). It is therefore suggested that criterion g is amended as follows:</p> <p>“g. Access to the development via Templars Way, subject to a detailed transport assessment which demonstrates this will not lead to a significant impact on the local road network”.</p> <p>There is the opportunity to target this development specifically as a low car development, with proper network of car clubs, strong active travel links and improved bus service. This could allow for higher density development and be marketed proactively as an alternative to typical suburban developments. The current bus service around the edge of the site is reasonable and this development (especially if created as a low-car development) could deliver sufficient additional demand to increase service levels. Eastleigh Town Centre and railway station are within a 15-minute cycling distance of the site and many employment opportunities are within walking and cycling distance and there are two supermarkets within walking distance. Therefore, access to the site via sustainable and active modes should be considered within the policy to ensure safe and attractive connections to existing residential areas and facilities. Suggest adding the following criterion:</p> <p>“j. The provision of high quality active travel infrastructure to provide links through the site and safe walking, wheeling and cycling connections to existing facilities and services”.</p>
<p>Infrastructure requirements (PROW)</p> <p>(IDP p.66)</p> <p>(Draft Local Plan 2040, criterion b, g & h. p.106)</p>	<p>Chilworth Bridleway 7 crosses the site from north to south and Chilworth Footpath 6 crosses the site from west to east. There is already an east-west cycleway alongside Castle Lane.</p> <p>Dedication of Bridleway rights should be sought for Chilworth Footpath 6 to give cycle access through the site linking via Bridleway 7 to existing off-road cycle provision along Castle Lane to North Baddesley.</p> <p>This site is an excellent opportunity to improve Chilworth Bridleway 7 and Chilworth RB 3 (‘Lordswood Lane’) to give a cycle route from the development and housing north of it into Southampton. This would also give</p>

Local Plan section / policy	Comment/suggestion: Land at Velmore Farm
	<p>commuting route to proposed employment site at Chilworth. Demand also recorded in the Countryside Access Plan. Legal rights exist, including bridge over M27.</p> <p>Policy SA6 para b) states “Provision of a significant area of high quality and accessible Green Space in the south and west of the site”. It is suggested this wording is enhanced to read:</p> <p><i>“ b) Provision of a country park in and beyond the south west of the site; consideration of joint promotion of the network of open access areas to the south and west of the site, known as ‘Forest Park (Policy SA16)’ including a visitor centre, signage and interpretation.”</i></p> <p>With reference to paragraphs “g) Access to the development via Templars Way” and “h) The enhancement of existing public rights of way, contributions towards enhancing a utility route to Southampton utilising Chilworth Bridleway 7 and Restricted Byway 3 or an alternative should be considered, along with the upgrade of Chilworth Footpath 6 to a bridleway.</p> <p>This would give a cycle route from the development and housing north of it into Southampton (towards the hospital and university) and a commuting route to the proposed employment site at Chilworth.</p>
Site Requirements - Education	<p>The catchment secondary schools are Crestwood Community School & The Mountbatten School. To mitigate the planned growth, applicants will be expected to contribute towards enhancing education capacity in accordance with Policy COM1, in the form of a new 1.5 form-entry (FE) school.</p> <p>Also, in accordance with policy COM1, one additional classroom for special educational needs and disability (SEND) provision at primary and secondary phase is required at an appropriate nearby maintained or special school.</p> <p>Any new school should be centrally located within its catchment area, within an 800m walking distance of all homes. Safe routes to school on foot or for cycling and wheeling should be provided. School site would need to</p>

Local Plan section / policy	Comment/suggestion: Land at Velmore Farm
	be permeable with an optimum number of pedestrian entrances. Parking provision for park and stride should be at least a five minute walk away, not immediately outside the school gate.

Local Plan section / policy	Comment/suggestion: Land at King Edward Park, Ampfield
SA7 p.107	The site is below 3ha in area but lies almost wholly within the Minerals Safeguarding Area. Suggested additional supporting text wording: <i>Applicants should aim to maximise the incidental extraction of mineral resources on this site, in line with the policies of the Hampshire Minerals and Waste Plan.</i>
Infrastructure requirements (PROW) (IDP p.69)	<p>There are no existing public rights of way across the site. The site is relatively small and is described as 'extra care accommodation', so proportional impacts to the rights of way network maybe limited. However, this highlights the opportunity to assess and improve accessibility to the network.</p> <ul style="list-style-type: none"> • Hampshire & Isle of Wight Wildlife Trust site Flexford Nature Reserve is opposite the site and paths can be very muddy • Ampfield FP1, BW4 and FP2 form a circular northwest of the site <p>It is requested that the wording of IDP SA7 is changed to say protection and enhancement "will" be required, not may be, in accordance with the requirements of Paragraph 104 of the NPPF (2023).</p>
4.204 (drainage)	The LLFA has identified this site allocation does not have clear options to drain surface water to.

Local Plan section / policy	Comment/suggestion: Land at Upton Lane
SA8	The site is over 3ha in area and lies wholly within the Minerals Safeguarding Area. The site lies within the Mineral Safeguarding Area, as defined by the Hampshire Minerals and Waste Plan. Proposals should aim to maximise the prior extraction of mineral resources on this site, in line with the policies of the Plan. A Mineral Resource Assessment is required to be submitted to the Minerals Planning Authority as part of any application to develop this site.
Transport (criterion f)	Although it is acknowledged that the primary proposed use of the site is employment use, the County Council still has concerns about access to this site via active and sustainable modes. Suggest the following criterion is added: "f. The provision of improvements to the local active travel network to ensure safe and high quality walking, cycling and wheeling connections to the site."
Infrastructure requirements (PROW) (Draft Local Plan 2040) p.110-111	<p>The Upton Lane site has no direct conflict with public rights of way. Provision of cycle links to Rownhams and Nursling would be welcomed, particularly an active travel route along the eastern boundaries of both sites running parallel to the A3057 which would enhance public rights of way links. Safe access onto Coldharbour Lane would enable cycle access from Romsey using Lee Lane and the existing off-road cycleway along the A27 at Romsey.</p> <p>Vehicle access to Upton Triangle is proposed off Lymer Lane, which becomes Nursling and Rownhams Footpath 501. The Footpath should be recognised and protected within a green corridor; physical and legal upgrade to give cycle access would be welcome.</p> <p>The route of Footpath 501 (future shared cycle route) should be segregated from any motorised vehicle access, as such to maintain the safe, priority public access afforded by the public rights of way.</p>
Site Requirements - Education	The catchment primary and secondary schools are Nursling CE Primary School & The Mountbatten School respectively. No additional school places are currently required to support this development. Nursling CE Primary School take a significant number of pupils from outside of Hampshire's Local Education Authority boundary, so there is potential to push back pupils to take the yield from this development.

Local Plan section / policy	Comment/suggestion: Land at Upton Lane
	Good shared cycle footway links compliant with LTN1.20 should be provided linking up to the Romsey road and beyond to ensure that there are routes for active travel to school.
Site requirements-drainage	The LLFA has identified this site allocation does not have clear options to drain surface water to.

Local Plan section / policy	Comment/suggestion: Land Adjacent to Abbey Park Industrial Estate, Romsey
SA9	The site is over 3ha in area and lies wholly within the Minerals Safeguarding Area. The site lies within the Mineral Safeguarding Area, as defined by the Hampshire Minerals and Waste Plan. Developers should aim to maximise the prior extraction of mineral resources on this site, in line with the policies of the Plan. A Mineral Resource Assessment is required to be submitted to the Minerals Planning Authority as part of any application to develop this site.

Local Plan section / policy	Comment/suggestion: Land South of Botley Road, Romsey
SA10	The site is below 3ha in area but lies wholly within the Minerals Safeguarding Area. The site lies within the Mineral Safeguarding Area, as defined by the Hampshire Minerals and Waste Plan. Developers should aim to maximise the incidental extraction of mineral resources on this site, in line with the policies of the Plan.

Local Plan section / policy	Comment/suggestion: Land South of Botley Road, Romsey
SA9 & SA10 Transport (criterion c)	<p>There are currently pedestrian facilities on Premier Way, connecting the sites to Luzborough Lane and Botley Road, however there is a lack of safe pedestrian crossing facilities that would be essential for encouraging active travel to site. There is currently a lack of cycling infrastructure to provide connections to the site. Suggest criterion c is amended as follows:</p> <p>“c. Access to the development via Premier Way, with the provision of improvements to walking, wheeling and cycling infrastructure as identified in the Southern Test Valley Local Cycling and Walking Infrastructure Plan (or subsequent equivalent document)”.</p>

Local Plan section / policy	Comment/suggestion: Land East of Test Valley Business Park
SA11	<p>The site is below 3ha in area but lies wholly within the Minerals Safeguarding Area. The site lies within the Mineral Safeguarding Area, as defined by the Hampshire Minerals and Waste Plan. Developers should aim to maximise the incidental extraction of mineral resources on this site, in line with the policies of the Plan.</p>
Transport (criterion d)	<p>Although the supporting text (criterion d) specifies that the site will be accessed from the existing site access this is not specified in the policy wording. Suggest that point d is amended to clarify this. This point should also be amended to include the requirement to contribute towards walking, wheeling and cycling measures, as suggested for policies SA9 and SA10.</p>

Local Plan section / policy	Comment/suggestion: Kennels Farm, University of Southampton Science Park, Chilworth
SA12 p,117	The site is below 3ha in area but lies wholly within the Minerals Safeguarding Area. The site lies within the Mineral Safeguarding Area, as defined by the Hampshire Minerals and Waste Plan. Developers should aim to maximise the incidental extraction of mineral resources on this site, in line with the policies of the Plan.
SA12-deliverability and availability	The County Council as landowner supports the draft allocation of Kennels Farm, and has opened discussions with the University of Southampton Science Park to ensure that the extension to the Science Park is comprehensively planned, including the provision of a vehicular connection from Benham Road.
Transport (criterion f)	The site is well located to connect to the existing active travel facilities on the A27, existing bus service and public rights of way network. Suggest the following additional criterion: “f. The provision of high quality links to the existing public rights of way network and active travel infrastructure on the A27”.
Infrastructure requirements (PROW) (Draft Local Plan 2040) p.117	<p>This site has an excellent opportunity to improve the potential journey-to-work routes at Lordswood Lane and the existing track through Rownhams Plantation, Home Copse and Long Copse:</p> <ul style="list-style-type: none"> • ‘Lordswood Lane’ aka Chilworth Restricted Byway 3, lies east of the site and links the site to Lordswood and Southampton’s residential areas including the University. It uses an existing bridge over the motorway and is open to walkers and cyclists but not motor vehicles (except any private use). • The track through Rownhams Plantation, Home Copse and Long Copse would enable links via Rownhams Lane to North Baddesley (northwards) and Rownhams (southwards). Rownhams Lane has a tarmac off-road cycle path from North Baeddesley. It is a Forestry Commission track with rights for walkers but not cyclists; there is currently no physical link to the proposed site. <p>It is suggested that site policy NA10 has wording that: <i>‘seeks the requirement to include support of active travel and public rights of way aiding the delivery of east-west routes though or in proximity to the site.’</i></p>

Local Plan section / policy	Comment/suggestion: Kennels Farm, University of Southampton Science Park, Chilworth
Site requirements (drainage)	The LLFA has identified this site allocation does not have clear options to drain surface water to.
Local Plan section / policy	Comment/suggestion: University of Southampton Science Park, Chilworth
SA13	<p>Suggest that the policy requirements refer to the need for access from Benham Road to connect with Policy SA12 Kennels Farm (as follows):</p> <p>a) <u>An access is provided from Benham Lane to serve the extension to the Science Park at Kennels Farm (Policy SA12).</u></p>
Local Plan section / policy	Comment/suggestion: Forest Park
SA16 Transport	<p>The location of Forest Park adjacent to the M27 and the aspiration for it to become a sub-regional facility will require access to the site to be carefully managed so that opportunities for travel by active and sustainable modes is realistic and achievable. It is suggested that the policy is amended with Guiding Principle 1 of LTP4 "Give people a choice of high-quality travel options" in mind. The County Council recommend the following policy wording is incorporated into the policy criteria:</p> <p><u>"Requirement to demonstrate that safe highway access can be achieved alongside the delivery of safe, high quality active travel connections to existing infrastructure and existing public rights of way".</u></p>

Local Plan section / policy	Comment/suggestion: Stockbridge Local Centre
SA17 Infrastructure requirements (PROW) (Draft Local Plan 2040) p.122-123	Any scheme coming forward should consider possible improvements to the Test Way and Footpath 5. This would provide benefits to active access and to tourism in the area, potentially enhancing custom.

Local Plan section / policy	Comment/suggestion: Land South of London Road, Picket Twenty
NA4 Transport (criterion b)	Additional wording to be added to include requirement for the site to link to existing cycling walking and public transport networks: “Access to the development via Picket Twenty way and Eddery Road / Pollard Road, and integration with existing pedestrian, cycle and public transport links”
Draft Local Plan 2040 p.73	<p>The Countyside Access Plan shows demand for cycle access on Andover FP1 (highlighted in yellow above right), which becomes an Restricted Byway; this would only be achievable with landowner permission. This would provide a beneficial cycle link between Picket Twenty and Bere Hill sites.</p> <p>A comprehensive approach is needed to enhancing access from this site to the wider Rights of Way and access network. This may include contributions to improvements to Andover Footpath 1 and Restricted Byway 67 (Forest Lane) in accordance with IDP NA4.</p>

Local Plan section / policy	Comment/suggestion: Land South of London Road, Picket Twenty
Site Requirements - Education	<p>The catchment secondary school is Winton Secondary School. To mitigate the planned growth, applicants will be expected to contribute towards enhancing education capacity in accordance with Policy COM1- by contributing towards the expansion of Winton Secondary School, as well as the existing day nursery at Picket twenty.</p> <p>Good cycle links should be provided linking to the existing network to enable active travel to this site.</p>
Local Plan section / policy	Comment/suggestion: Land at Manor Farm, North Andover
NA5 Transport (criterion h)	<p>The policy should make reference to access to the site and through the site using sustainable modes. Suggest addition of the following criterion:</p> <p>“h. The provision of high quality active travel infrastructure to provide links through the site and safe walking, wheeling and cycling connections to existing facilities south of Saxon Way”</p>
Infrastructure requirements (PROW) (IDP p.48, Draft Test Valley Local Plan criterion a & g)	<p>Enham Alamein Footpaths 723, 726 and Restricted Byways 755, 757 and 758 all cross the site.</p> <p>Local priorities include:</p> <ul style="list-style-type: none"> • Surface/improve Enham Alamein RB 757 (Restricted Byway through the centre of the site including Bilgrove Copse); Countryside Access Plan research notes “Restricted Byway - deep mud in middle portion. This is a good alternative to A343 northwards” • Surface/improve Enham Alamein Restricted Byway 755 (which runs along eastern edge of the development site); this is an important and already well-used link from Enham to Andover cycle network. • Surface/improve Enham Alamein FP, 757 which links Enham to Smannell and is very well used.

Local Plan section / policy	Comment/suggestion: Land at Manor Farm, North Andover
	<p>There is a sizeable disabled population in Enham - any improvements should aim to give as much Disability Discrimination Act compliant access as possible.</p> <p>Contributions may be sought towards maintenance and enhancement of the wider Rights of Way and access network including enhancement of Enham Alamein RB 757, RB 755 and RB758 in accordance with IDP NA5 and for Andover Wood Millenium Woodland.</p>
Site Requirements - Education	<p>To mitigate the planned growth, applicants will be expected to contribute towards enhancing education capacity in accordance with Policy COM1- contributions towards Harrow Way Community School, and potentially Knights Enham Infant & Junior School. These are the catchment secondary and primary schools respectively.</p> <p>There is currently some capacity at Knights Enham Infant & Junior School, but the situation would need to be assessed at the planning stage. This site, as well as Land to the South and East of Ludgershall would result in the expansion of Harrow Way Community School, and the contributions would be proportionate based on the numbers of dwellings and pupil yield.</p> <p>Also in accordance with policy COM1 one additional classroom for special educational needs and disability (SEND) provision at primary and secondary phase is required at an appropriate nearby maintained or special school.</p> <p>Consideration needs to be given to providing a safe crossing point into the Junior School.</p>

Local Plan section / policy	Comment/suggestion: Land at Bere Hill, South Andover
<p>NA6</p> <p>Transport</p> <p>(criterion f & i)</p>	<p>Policy DM2(h) of LTP4 states that the Local Highway Authority will only support new accesses onto A roads where the strategic flow of traffic is prioritised, and all other reasonable options have been considered. The roundabout also currently provides a poor environment for those walking, wheeling and cycling and would require improvements to provide safe connections to Picket Twenty. Suggest amending criterion f:</p> <p>“f. Access to the development via A3093 roundabout, where it can be demonstrated the strategic flow of traffic is prioritised and high-quality active travel connectivity can be delivered”.</p> <p>Micheldever Road is not suitable for car traffic from the development but will provide a good opportunity for a direct active travel route to Andover. The town centre and railway station are within a 10 minute cycle journey which could match or better car travel times to these destinations. Suggest the additional criterion of:</p> <p>“i. The enhancement of Micheldever Road to provide a safe and convenient walking, wheel and cycling link to Andover town centre”</p>
<p>Infrastructure requirements (PROW)</p> <p>(IDP p.51, Draft Test Valley Local Plan criterion 4.76)</p>	<p>A network of Footpaths cross the site (Andover Footpaths 2,3,4,5 and 502) and a Restricted Byway/Byway runs north/south along the western edge of the site (Andover RB 52, which south of the A303 becomes Upper Clatford RB 752 and BOAT 16).</p> <p>A Country Park is welcomed as a concept; there is relatively little publicly accessible countryside in the area and its proposed location would also benefit the wider population of Andover. It is noted that a steep field adjoining the northern edge of the development area is currently used as open access, demonstrating a demand which will grow significantly with additional population, although the legal permission is not known.</p> <p>It will be important to enhance routes linking to the landscape south of the A303, particularly the Clatfords and Harewood Forest. Two rights of way provide this connection and should be enhanced and paths provided to them within the development. The western route is the Restricted Byway /Byway open to all traffic (Upper Clatford BOAT 16, footpath 752 and Goodworth Clatford footpath 17); the surface here should be physically upgraded to cope with the additional use. The eastern path (Andover Footpath 2, 3 Goodworth Clatford 702 and 9) should be</p>

Local Plan section / policy	Comment/suggestion: Land at Bere Hill, South Andover
	<p>considered for upgrade to Bridleway to allow access by cycle and ridden horse. A Footpath is shown between these two proposed routes (Upper Clatford footpath 705 and 13, going through the Solar Farm); it does not have facility to cross the A303, so efforts should concentrate on the two proposed routes mentioned previously.</p> <p>Andover Footpath 4 which runs east-west across the site is known locally as 'Ladies Walk' and should be protected and enhanced to ensure accessibility.</p> <p>A comprehensive approach to maintaining and enhancing public rights of way across the site should be included in any outline planning applications. Financial contributions may be sought to enhance access from this site to the wider network, including the two Rights of Way with established crossings of the A303 which lead south into the countryside including Harewood Forest (Andover Restricted Byway 52 and Footpath 2) in accordance with the IDP NA6 and paths extending towards Pickets Piece. Inclusion of a Bridleway along the southern edge of the site, parallel to the A303 and connecting to the existing network at either end would be welcomed; if this were achieved extinguishment of part of Footpaths 2 and 3 would be considered.</p>
Site Requirements - Education	<p>The catchment primary and secondary schools are Anton Infant and Junior School & Winton Secondary School. To mitigate the planned growth, applicants will be expected to contribute towards enhancing education capacity in accordance with Policy COM1- contributions towards Winton Secondary School and providing a new 2FE school. To meet the demand of pre-school children from the site, a 110 place Day nursery and 40 place preschool option could be provided on the school site.</p> <p>In accordance with policy COM1 one to two additional classrooms for SEND (special educational needs and disability) provision would be required at primary and secondary phase, at an appropriate nearby maintained or special school.</p> <p>Any new school should be centrally located within its catchment area, within an 800m walking distance of all homes. Safe routes to school on foot or for cycling and wheeling should be provided. The school site would need to be permeable with an optimum number of pedestrian entrances. Parking provision for park and stride should</p>

Local Plan section / policy	Comment/suggestion: Land at Bere Hill, South Andover
	be at least a five-minute walk away, not immediately outside the school gate. A contribution for both a framework and a follow up full travel plan should be secured from the developer.

Local Plan section / policy	Comment/suggestion: Land at the East of Ludgershall
NA7 Transport (criterion d & f)	<p>Policy DM2(h) of LTP4 states that the Local Highway Authority will only support new accesses onto A roads where the strategic flow of traffic is prioritised and all other reasonable options have been considered. Suggest amending criterion d:</p> <p>“d. Access to the development via A342 to the south, where it can be demonstrated the strategic flow of traffic is prioritised”.</p> <p>Notwithstanding policy contained within LTP4, the County Council is unable to provide comments on whether a new access onto the A342 would be achievable or acceptable due to the lack of technical evidence available at this stage. The County Council would welcome further engagement with the site promoters and the Borough Council to discuss how safe access to the site could be achieved.</p> <p>There is currently no footway or cycleway provision on the A342 so the policy should consider how residents access facilities in Ludgershall without the need for a car. Suggest the additional criterion of:</p> <p>“g. The provision of high-quality active travel infrastructure to provide links through the site and safe walking, wheeling and cycling connections to existing facilities in Ludgershall.”</p>

Local Plan section / policy	Comment/suggestion: Land at the East of Ludgershall
Site Requirements - Education	<p>The catchment secondary school to this site is Harrow Way Community School. To mitigate the planned growth, applicants will be expected to contribute towards enhancing education capacity in accordance with Policy COM1- contributions towards the expansion of Harrow Way Community School. Contributions would also be sought for the creation of a new primary school or the expansion of Appleshaw St Peter's CE Primary & Kimpton, Thruxton & Fyfield CE Primary schools to meet the demand brought by this site. For the primary phase this would need to be considered alongside the other site of land South East of Ludgershall.</p> <p>A new pre-school would also be required as part of this site.</p> <p>Contribution would need to be secured for Home to School transport as more than 3 miles to Harrow Way Community School.</p>

Local Plan section / policy	Comment/suggestion: Land to the South East of Ludgershall
NA8 (criterion e & i)	<p>Similar issues to Policy NA7 with the addition of the need to demonstrate that a crossing of the railway line is achievable and deliverable. The potential for this route to accommodate traffic from the development site proposed within the emerging Wiltshire Local Plan should also be considered within the assessment of the site and the impact of development.</p> <p>Suggest the following change to criterion e: “e. Access to the development via bridge over the railway line to the A342 to the north, where it can be demonstrated strategic flow of traffic is prioritised”.</p> <p>Notwithstanding policy contained within LTP4, the County Council is unable to provide comments on whether a new access onto the A342 or crossing of the railway line would be achievable or acceptable due to the lack of</p>

Local Plan section / policy	Comment/suggestion: Land to the South East of Ludgershall
	<p>technical evidence available at this stage. The County Council would welcome further engagement with the site promoters, Wiltshire Council and the Borough Council to discuss how safe access to the site could be achieved.</p> <p>Suggest the additional criterion of: “i. The provision of high-quality active travel infrastructure to provide links through the site and safe walking, wheeling and cycling connections to existing facilities in Ludgershall.”</p>
NA7 & NA8 Infrastructure requirements (PROW) (IDP page 57, Draft Test Valley Local Plan criterion 4.97)	<p>Kimpton Footpath 7 crosses the site and Footpaths 501 and 6 are just south of the site. Kimpton Bridleway 12 runs eastward from the site.</p> <p>There is a lack of Bridleways at present and a significant demand from horse-riders. Adjacent development is planned in Wiltshire.</p> <p>An extension to Kimpton Bridleway 12 into the development site, which would provide a through route from Ludgershall into the countryside to the east, would be welcomed.</p> <p>Given that this site abuts the county boundary a collaborative approach with Wiltshire Council to providing a connected rights of way network and countryside/ green infrastructure is needed. Consideration should be had for area tier green recreation space, such as a new country park to mitigate against private vehicle use and impacts on the nearby National Landscape.</p> <p>The County Council request that additional supporting paragraphs are added to both NA7 and NA8 to include the requirement for protecting and enhancing access to the countryside as well as to towns. And 4.97, including consideration of the upgrading of existing Footpaths to Bridleways, such as Kimpton Footpaths 6, 7 and 501.</p> <p>A contribution may be sought towards maintenance and enhancement of the wider rights of way network in accordance with IDP NA7 and NA8, including onsite and offsite upgrades of existing Footpaths to Bridleways.</p>

Local Plan section / policy	Comment/suggestion: Land to the South East of Ludgershall
Site Requirements - Education	<p>The catchment secondary school to this site is Harrow Way Community School. To mitigate the planned growth, applicants will be expected to contribute towards enhancing education capacity in accordance with Policy COM1- contributions towards the expansion of Harrow Way Community School. Contributions would also be sought for the creation of a new primary school or the expansion of Appleshaw St Peter's CE Primary & Kimpton, Thruxton & Fyfield CE Primary schools to meet the demand brought by this site. For the primary phase this would need to be considered alongside the other site of land East of Ludgershall.</p> <p>In accordance with policy COM1 one additional classroom for SEND (special educational needs and disability) provision at primary and secondary phase is required at an appropriate nearby maintained or special school.</p> <p>A new pre-school would also be required as part of this site.</p> <p>Contribution would need to be secured for Home to School transport as it is more than three miles to Harrow Way Community School.</p>

Local Plan section / policy	Comment/suggestion: Thruxton Aerodrome
NA9 and NA10 Minerals and Waste (p.85-89)	<p>Both these proposed allocated sites fall within the buffer zone of the safeguarded Thruxton Airfield waste site. This site is operated by SITA and Earthline Ltd. and is currently safeguarded under Policy 26 (safeguarding – waste infrastructure) of the Hampshire Minerals and Waste Plan.</p> <p>There is no mention of this safeguarded site in either policy's supporting text, so it is requested that this be included. Wording to require engagement with the Waste Planning Authority and the safeguarded site's operators is needed. Furthermore, it is requested that the requirement to not constrain existing or allocated</p>

Local Plan section / policy	Comment/suggestion: Thruxton Aerodrome
	minerals or waste infrastructure is included in the supporting text of both Policy NA9 and NA10 and the wider draft Local Plan.
NA9 Transport (criterion d)	There needs to be a more robust approach to ensuring accessibility to the site by sustainable means is improved to ensure the development can be accessed without needing a car. Suggest the following amendment to criterion d: “d. Access via existing business park at Aerodrome Road and high-quality connections to existing walking, wheeling and cycling links to be provided”
NA10 Transport (criterion f)	There needs to be a more robust approach to ensuring accessibility to the site by sustainable means is improved to ensure the development can be accessed without needing a car. Suggest amending criterion f as follows: “f. Access via existing business park at Aerodrome Road and high-quality connections to existing walking, wheeling and cycling links to be provided”