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Planning Policy and Economic Development
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Dear sirs

Test Valley Local Plan 2040

Regulation 18 Stage 2 Consultation

1. Opening Comments

This letter sets out the jointly made response of Go South Coast Limited, and Stagecoach South, a subsidiary of Stagecoach Group, to the current Test Valley Local Plan consultation. Go South Coast is leading in the submission of these joint representations, and in the first instance, communication should be addressed to Nick Small, Head of Built Environment and Infrastructure at Go South Coast Ltd. at the address set out below.

Bluestar is the trading business name of Go South Coast in most of the plan area. It is the principal bus operator in Southampton and its immediate urban hinterland extending to Romsey, as well as in the neighbouring authorities of Eastleigh Borough and New Forest District. These services are mainly operated from depots at Southampton, Totton and Barton Park, Eastleigh. A much more limited amount of mileage serving Romsey, including a link to Salisbury is run from the Salisbury Reds business and its depot in Salisbury.

Stagecoach South ("Stagecoach") is the principal bus operator in Test Valley North, as well as Winchester and in Basingstoke and Deane. Services are operated from a depot within the District at Andover, supplemented on some routes with vehicles and staff based at Winchester and Basingstoke.

The key interurban bus link between Andover, Ludgershall, Tidworth Amesbury and Salisbury known as "Activ8" is an important component of the District's public transport offer. It is jointly operated by Stagecoach South and by Go South Coast's "Salisbury Red" business, under its own distinct brand.

The vast majority of mileage is operated commercially with the costs defrayed by passenger revenue, whether from retail sale of tickets and passes or from reimbursement of concessionary travel which we must provide by law.

Several much less busy and non-strategic routes are unable to cover their operating costs in this way and are financially supported by Hampshire County Council. Severe budgetary constraints have led to the entire budget being proposed for withdrawal, under “Savings Plan 25” (“SP25”) in which case these routes would cease from Summer 2025. However, with the exception of some lesser used routes in Andover, that we highlight in this response with reference to certain proposed allocations adjacent to Andover, none are very regular or of particular relevance to the Plan or the plan strategy. The draft plan makes plain at several points, including in the evidence base, that this possibility is accounted for.

Both operators are keen to offer the clearest possible advice and support to the challenging task of meeting the development needs of the District in as sustainable a manner as possible. As expected by both the National Decarbonisation Plan for Transport and Chapter 9 of the National Planning Policy Framework, the plan can and should seek to maximise the attractiveness and relevance of sustainable modes, and public transport in particular.

A strategy that has the fullest possible regard for the potential role of bus is also at the same time, likely to catalyse wider improvements in bus service connectivity and frequency that benefit a far larger number of existing residents and journey demands, with commensurate positive outcomes for carbon mitigation, socio-economic inclusion and public health; all of which are reflected in the Strategic Objectives of the draft plan.

We offer these comments with these important shared goals in mind.

2. Previous Input into the TVLPR 2040

Go South Coast and Stagecoach South jointly gave input into the Issues and Option Consultation in 2020 and 2022.

We welcome the opportunity to offer this input and shape the final Regulation 19 draft. We are very keen to ensure that effective ongoing collaboration takes place at this stage to ensure that the main public transport operators can clearly and unequivocally endorse both the plan-making process, and the outcome. We are confident that PINS will be taking a keen interest in representations such as ours, not least in view of the expectations set out in NPPF at para 15 c).

3. Scope of the Plan

We note that the Draft Local Plan 2040 replaces the Revised Local Plan 2016 adopted on 27th January 2016. This made provision for development needs, based on a now out-of date assessment of requirements, only as far as 2029.

The law makes clear that local plans should be reviewed every 5 years. The adopted plan was subject to a review in 2020 to check that it remained relevant and effective, and it was concluded that it did. The adopted Plan has, importantly, successfully brought forward the development quantum allocated, in almost all cases. The big exception is the strategic development south of Romsey at Whitenap.

However, there is an urgent need to progress the review and we welcome that the Council is committed to bringing an up-to-date plan forward. 10 years on from the genesis of the existing adopted plan, this plan will become policy no earlier than 2026, and as such a very substantial period of time has elapsed since the last formal plan-making process. By the time the plan is adopted there will be very little remaining time within the horizon of the current plan and its allocations will have been all but entirely spent. It is vital that the plan-led system leads the identification of an

appropriate strategy and sites to meet currently-assessed development needs into the future. Reflecting present knowledge and evidence, there is an even more urgent need, it should be argued, to ensure that the development strategy takes much a more urgent view of the issues arising from climate change, in terms of mitigating both its causes and effects, than does the current plan.

The National Planning Policy Framework (NPPF) makes plain at paragraph 61 that local plans must look forward at least 15 years from the date of adoption. The proposed horizon of 2040 reflects the initiation of the review process, which was significantly paused for over 2 years. It implies an adoption date of no later than 2025.

However, there is no credible prospect that the plan could be adopted by 2025. The Council has still to review the results of this consultation and undertake significant preparation of further evidence, as well as the final Regulation 19 pre-submission Plan, on which consultation and further work will be needed prior to submission. The Examination in Public (EiP) will require a significant period, and the potential for modifications should not be discounted – not least as key additional evidence emerges from the parallel progression of local plans in the City of Southampton and New Forest District, which could well raise the need for the plan to consider if it should meet needs that cannot be appropriately met within those neighbouring authorities.

In fact, the timescales for EiP are likely to be extended given the simultaneous progression of multiple local plans across England after a stasis of over 30 months as a result of highly publicised central Government deliberations over first, proposed replacement of the current planning system, then even more protracted proposals for its reform. The consequential surge in plan-making activity across England is already very evident. The organisation capacity of HM Planning Inspectorate (PINS) is not unlimited. There is thus a material further risk of extended delays awaiting Examination in Public of the plan even when it is submitted. It is our assumption that will seek to prioritise EiPs of those plans where there is a major policy lacuna in place and there has been no plan adopted since well before 2014. Many LPAs are, regrettably, in this position and will be “ahead of Test Valley in the queue” for EiP.

We note the Local Development Scheme timetable set out at Fig 1.2 of the draft. Realistically, having regard to the need to process the current consultation, finalise the Regulation 19 draft, progress the statutory consultation process and then submit the Plan, on our wide and deep experience, we would suggest that the Council will struggle to see submission even by the end of 2025.

Commencement of EiP within a couple of months of submission is entirely unrealistic. If plan is in fact submitted close to the LDS timetable in late summer 2025, we are sceptical that EiP would start commence much before September 2026. With a straightforward EiP, the earliest adoption would be likely to take place in mid-late 2027.

All this assumes no change to national planning policy, in particular, on matters surrounding assessing and meeting development needs.

We see no grounds to expect, as the draft does at para 1.41, that adoption would take place earlier than the LDS currently indicates, of the evidence that supports the grounds for this confidence.

Rather, we note the admission at para 2.10 that the plan preparation process faces material risks of further delay:

“However, there are still a number of steps the Government needs to undertake for the new planning system to be implemented by 30 June 2025 and therefore there is still a risk this could change. If there are other potential changes, this could present significant risk to the preparation of the Local Plan

2040. If this were to take place, we may need to pause plan preparation and consider any implications for the Local Plan 2040.”

We consider that such changes are all but certain, not least in the light of public commitments by the other main political parties.

Accordingly, the Plan should certainly have an end date of 2042 and it may be prudent to look forward to 2043.

Sticking to a 2040 end date is more likely, in practical terms, to lead to the overall preparation period extending, as further substantial modifications need to be made to the plan to ensure it meets the test of “positive preparation” set out in NPPF. Since the Inspectorate has repeatedly made clear in recent years that the purpose of the EiP is not to refine and rework unsound plans to make them sound, it is also now the case that PINS are not agreeing to commence formal examination where fundamental issues of soundness are identifiable after submission. This then leads to a spiral of delay as plan horizons are extended, and additional development needs require sites to be identified, and then consulted upon further.

We urge the Council to take a prudent view, that de-risks the preparation, submission and examination process. This is much more likely to ensure an up-to-date local plan is in place at the earliest reasonable point in time.

4. The spatial division of the Borough

The extent of the Borough is unusual, being a relatively extensive area that spans a very unusually diverse range of landscapes, ecosystems, social and economic contexts ranging from some of the sparsest populated areas in England in the north and west within the North Wessex Downs National Landscape, to the urban fringe of Southampton.

We note that:

“Four-year (corporate) Plan 2023-27 splits Test Valley into three place-based areas reflecting the varying needs of the borough’s communities. These are:

- *Andover and Romsey*
- *Chilworth, North Baddesley, Nursling and Rownhams and Valley Park,*
- *Villages and Rural Area” (para 1.19)*

This contrasts with and cuts across the more obvious binary division between the north, beyond the direct influence of Southampton within the chalk downs, and the south, reflected in the current spatial strategy of the Local Plan 2016.

Andover and Romsey are both significant historic market towns, that have expended greatly since the Second World War. However, they have profoundly different contexts, and their roles, and spatial interactions having regard to the space economy of the County and the wider region are very different.

Andover, much the larger, was the focus of plan-led expansion under the Town Development Act 1952 to receive overspill from Greater London during the 1960s and 1970s, much of this actually delivered by the GLC. The town lies on the London-Exeter rail line which broadly parallels the M3/A303 Trunk Road route towards Devon. Romsey has seen lesser, more incremental development, but is clearly oriented towards the south, closely related to Greater Southampton area and the wider Solent and the M3/M27 corridor. Both are the focus for significant plan-led growth in the current

plan, as two of the most sustainable development locations where development capacity was identifiable. It is arguable, looking at their spatial interactions and context, if they have great deal else in common.

The current north-south split also aligns very naturally with the extent of the Partnership for South Hampshire (“PfSH”) area, reflecting the degree to which the adjoining authorities’ jurisdictions spatially interact with the major conurbations along the Solent. TVBC has been a member of the Partnership and its predecessor for many years. There has, for decades, been an acknowledgement that housing and economic needs arising in the Southampton Conurbation cannot all realistically be met within the city’s boundaries. The draft plan is clearly not being progressed with a current view to consider the undoubtedly difficult matter of how far unmet needs arising from Southampton (or indeed New Forest District) exist within the Plan period. While we accept these needs are not yet demonstrated, it is clear they are likely to be before this plan reaches Examination in Public, and quite possible prior to submission.

Relatively unconstrained opportunities apparently exist closely related to the City of Southampton within the Borough, to potentially meet these needs. Land at Fields Farm and East of Parkers Farm, Rownhams, stand out as such, being directly adjacent to the existing built up area and easily integrated with it.

We are also aware that a substantial promotion is underway in the Lee/Upton area. This is referred to in the Draft Sustainability Assessment (SA) at paragraph 5.90 as SHELAA Site 159 at Grove Farm (2000 dwellings). This was discounted on principle as it was considered that the required quantum could be accommodated without the need to identify new settlements. We discuss the implications of this later in the wider discussion of the SA methodology.

Accordingly, we urge the Council to wait until the submission of the Southampton City Vision Regulation 19 draft and a formal indication as to whether or not an unmet need for housing requires accommodation within Test Valley, as we elaborate upon later in this response.

5. Planning in the light of the Climate Emergency

“Central to this Local Plan, is addressing and countering our changing climate through minimising the impact of new development and adaptation. This relates to many of the matters that will be addressed in the Local Plan 2040, from the location, design and layout of buildings to using nature-based solutions.” (para 1.23)

While this is all understandable, most of the decisions about the impact of future new buildings on emissions, and their resilience to climate change, have already been made and are immutably set. This includes national legally-binding Building Regulations, including Parts F, L, O and P; as well as urban design, where national expectations are set out clearly in the National Model Design Code. Even where there is scope for local policy to be applied, this has little or no spatial component. Most of the effectiveness of these technical strategies would be applicable wherever the development was located.

This being the case, and in view of the fact that transport now represents the largest component of domestic emissions, **by far the biggest influence the plan can now have on locally generated carbon emissions, is on the way that location of development can radically reduce distances of interaction, and thus travel demand; and at the same time, ensure that trips are as far as possible achievable such that active travel and public transport represent “the natural first choice” for these trips.**

As para 2.66 in the draft plan states explicitly, emissions arising from transport, and personal mobility in particular, are now the single biggest contributor to the carbon footprint of the Borough. As the National Transport Decarbonisation Plan makes plain, these emissions are accounting for a rising proportion of the whole, while the broad trajectory is already proving to be especially challenging to achieve.

A spatial strategy that will be effective in addressing this through a clear focus on pursuing a spatial strategy that facilitates sustainable transport, will need to pursue the principles set out in NPPF paragraphs 108-110 with clear focus and singular determination; while, naturally, keeping the other themes and constraints to which the plan must have regard, in view.

It is thus **concerning and highly regrettable that this is given neither clear focus nor the necessary weight in the assessment of issues facing the plan** at the outset of this draft.

6. The Evidence Base for the Plan.

6.1. The effects of COVID-19

Where evidence, and especially transport evidence is concerned, we note the comments at paragraph 2.15

“We are preparing the Local Plan 2040 at a time where the Coronavirus pandemic has affected us all. We will need to take account of any changes arising from the pandemic on the way we live and work, as these emerge...”

Notwithstanding the unprecedented disruption that arose from COVID-19, we are quite unclear what effects are envisaged still to emerge by the Council, as far as matters that the Local Plan would be influenced by.

Of all the impacts of repeated “lockdowns” it was transport and mobility that saw the biggest changes. Of all modes, public transport saw the most devastating impacts, as national and local government intentionally sought to portray public transport use as dangerously irresponsible. There was much speculation that much, or indeed most need to leave home to work in the service and professional sector would permanently evaporate; and that consequentially, the demand to travel at peak times would permanently reduce to a degree that problems related to peak traffic congestion would never re-appear. Rather, local services and retail would be the focus of activity and walking and cycling would see a COVID-induced acceleration of take-up to effect a permanent positive step change.

At this writing, all this speculation has been comprehensively overtaken by experience. We would emphasise the following points:

- Bus passenger boardings, on a like-for-like basis, have rebounded in most cases to well over 90% of pre-COVID peaks.
- The segment of use that has seen the most permanent loss is those over 67 travelling free of charge on concessionary passes, where boardings are at about 80-87% of fare-paying levels.
- The effect of the government’s £2 fare cap per single journey has had a particularly beneficial impact on boardings on longer-distance inter-urban services. Some services are now seeing patronage at significantly above 2019 levels.

- There is now clear evidence of greater journey to work travel in the office market across our business in Hampshire and more broadly. This is more heavily focused on Tuesday-Thursday. This is also clearly reflected in road traffic levels, where lesser pressure is experienced on Mondays and Fridays. Traffic congestion is at least as serious a challenge to the efficiency, attractiveness and reliability of bus journeys as it was in 2019.
- While use of bus for shopping has declined, to about 20% of bus journeys, it has significantly increased for leisure and social purposes. Travel at weekends, including Sundays, and in the evenings, has recovered more quickly than the traditional weekday peaks.
- Recruitment and retention of staff remains a serious issue in South Hampshire and adjoining areas – including South Wiltshire. Where timetables have not been yet been fully restored to pre-COVID levels this largely reflects difficulties in recruiting sufficient establishment to deliver a higher timetable frequency. However, our Bluestar business is continuing to succeed in meeting this challenge, allowing us to continue to improve timetables.

6.2. Nature of the Evidence Base required

We recognise that:

“The Levelling-up and Regeneration Act 2023 is aiming to shorten the length of time Local Plans take to be prepared to within a 30-month period, including streamlining evidence requirements. This includes introducing new National Development Management Policies (to sit alongside a slimmed down NPPF) so Local Plans can focus on specific localised issues.” (para 2.6)

However, the published December 2023 NPPF made no large-scale changes, and on a large number of technical areas, national government has failed to issue any of its promised guidance. Given that an election will take place within months, the statements made in paragraph 2.6, that are those of the current administration, look quite likely not to be borne out. Indeed, given the time that has elapsed since August 2021 and the initial White Paper on Planning Reform, government could easily have progressed its “evidence light” reforms but has so far made a positive choice not to do so.

Rather, the prior NPPF requirement on the evidential test of soundness remains entirely unchanged.

Meeting the requirements of NPPF, including Chapter 9 in particular, demands that the spatial strategy is properly informed by transport evidence, among many other things, if it is to be credibly fund sound.

Go South Coast and our sister companies in the Go-Ahead Group have broad and deep exposure to local plan making, especially across southern England and have been active participants across multiple LPA areas since 2013.

With this experience in view, we would say that it is certainly the case that many LPAs have advanced plans with spatial strategies that have had little if any regard to transport evidence at “the earliest possible stage” as NPP para 108 requires. This is the same language as every previous version of NPPF has included since 2012. For most of the last 12 years, most such plans have, ultimately, been accepted as sound by PINS, often following Inspector Reports that have clearly exposed serious concerns and discomfort about the transport impacts of development and the mitigation strategies proposed. This reflected, until about 2019, a recognition that having suitably ambitious up-to-date plans in place was the more important matter.

After 2019, there is a clear sign of a shift away from this very level of pragmatism. As a result, multiple submitted plans have failed wholly or substantially on transport grounds, including Uttlesford, North Essex, West of England Joint Strategic Plan, and now – perhaps most relevant of all – Stroud. In other cases, such as Swindon, Regulation 19 plans without an up-to-date transport evidence base on which formal consultation took place, were not in the end submitted for Examination.

The Draft Sustainability Appraisal (SA), with its methodology informed by the Sustainability Framework, (para 1.46-47) is key to the plan's evidence base. This has been made available alongside this consultation.

Limited direct transport-related evidence is provided to support this draft of the plan. The relevant published evidence takes the form of:

- some attempt was made to look at public transport availability in the **Settlement Hierarchy** reappraisal, but use of this criterion was, essentially, abandoned.
- a **Transport Assessment** (TA) presenting the outputs of a Strategic Traffic Model on the one hand, and an assessment of transport and connectivity criteria in the Sustainability Appraisal, including site specific assessments.
- The **Assessment Methodology within the SA** also has a range of transport and connectivity criteria, that reflect the draft Strategic Objectives of the plan. The results of this assessment including in the Site Assessment tables at Appendix IV to the SA Report.

Given the nature of the Plan area and the ready acknowledgement within the draft plan text that addressing sustainable mobility imperatives will present a particular challenge to the plan, we find it quite concerning that there is not a deep and more rigorous consideration of the potential development opportunities against sustainable transport and mobility criteria.

6.3. Settlement Hierarchy Review

We note above that the Council elected to abandon assessment of public transport connectivity in its preparation of the Settlement Hierarchy. We cover this later in this response. Essentially though, this was related to a recognition that outside the main Tier 1 and 2 settlements, public transport does not currently provide a credible choice in many other smaller settlements, and to the degree that limited services are offered today supported by County Council funding, these might well cease in the foreseeable future.

In fact, the Tier 2 settlement of Stockbridge – in which there are no developments allocated and population is minimal, falls into this potential scenario. This being the case we cannot find great fault with the Council for taking this approach, since the presence or otherwise of a minimal public transport offer would not have influenced the hierarchy, and the resulting spatial strategy does not make significant allocations at Tier 3 and 4 locations.

Thus, the excision of the public transport assessment criterion from the Settlement Hierarchy evidence is considered rational and **we are content** it does not undermine, skew or distort the plan strategy.

That said, there is nothing that indicates how the Council has engaged with bus operators to examine what links might become viable between the biggest settlements if a suitable development strategy were to focus on opportunities on it. NPPF clearly expects this level of engagement with transport infrastructure providers and operators at Paragraph 15 c).

6.4. Transport Assessment and the Strategic Traffic Model

Draft Sustainability Appraisal (SA) para 5.71 explains the purpose of the Transport Assessment in the following terms:

“a (TA) has been undertaken including transport modelling to assess the impact of sites which has informed definition of the ‘pool of preferred sites’ and reasonable growth scenarios.”

In other words, it makes no attempt to establish which sites or groups of sites can demonstrably be expected to minimise the uptake of car-borne journeys but applies a car trip generation rate quite broadly across the options and the specific sites that have been determined warrant modelling together as part of a spatial strategy.

The Strategic Transport Model is a generic strategic traffic model. It has no ability to look at the potential to achieve mode shift to sustainable modes nor does it attempt to do so. The model simply attempts to model trip generation by passenger car units onto the local and more strategic highway network and is intended only to achieve something approximating to realistic “worst case” scenario of queueing and delay impact on the network for a limited number of scenario packages – in this case, four. The number of sites retained as part of the “pool of preferred sites” that constitute these options is also predetermined.

As such the TA and its STM does not clearly lead the plan, cannot do so, nor is it intended to. It follows from a set of predetermined allocation scenarios. **It reflects the typical “predict and provide” methodology that has underpinned UK transport planning and the vast majority of local plan preparation exercises for generations.** No plan that is underpinned by such a methodology ever attempts to arrive at a strategy that secures a substantially higher mode share from sustainable transport, because there is neither a desire to, nor a need to. Since all potential allocations are equally accessible by car, the problem to be solved through this methodology is not one of accessibility or mobility, as the model looks only at cars and thus can only present results framed from what is unavoidably a car-mobility-led vision. The objective is solely one of managing and mitigating traffic impacts.

Evidently car-borne trips currently predominate and realistically will continue to account for a very substantial amount of mobility across the plan area. **This does not, however, excuse a methodology that can only replicate and aggravate car-dependency from first principles.**

There can be no doubt that in pursuing this well-worn path, the Council and other stakeholders can expect no different outcomes than has been achieved over the last 60 years: a high and increasing level of car dependency. However, this is **directly oppositional to the Plan’s Strategic Objectives.**

This approach is directly in contradiction with national and local policy – including draft Hampshire LTP4. It also runs entirely counter to the PfSH Spatial Position Statement. **This deeply troubling.**

That the results of the Strategic Traffic Model show little real problems in the Northern Area comes as little surprise. The area is relatively sparsely populated. The main settlement at Andover was the subject to major plan-led expansion from the mid-1960s under the Town Development Act 1952, and much of an elaborate master plan involving high capacity roads and links was in fact built.

To the extent that key connections over the railway were not, some residual issues remain, most notably at the A343 Enham Arches. These are not exceptional, and modelling indicates that even with all options brought forward north of the rail line the link would operate within 91% of nominal capacity. This is very close to saturation but generally not considered to represent a major problem.

Where bus services are concerned, we would stress that two bus gates are either in place (and in use) at River Way and a second planned at Finkley Down Farm. These would insulate bus services from any problems that did arise, especially southbound in the morning peak.

In the Southern Area, which impinges directly on the national Strategic Roads Network (SRN) in the form of the M27 and M271, and to a more indirect degree on the M3 there are clearly bigger issues, many of which arising entirely exogenous to the plan, and cannot realistically be expected to be solved by it.

This is recognised at paragraph 6.9 of the SA in the following terms:

“There is pressure on the transport network in the south of the plan area from background traffic growth over the plan period. However, the transport modelling has concluded that the reasonable alternative growth scenarios for the south do not have a significant effect over and above the baseline situation.”

This is acknowledged, though it does not give us comfort as bus operators **that bus services do not risk becoming slower, less reliable and less attractive. There is a very material risk that deterioration in highways congestion will make already somewhat marginal bus services unviable** – and the plan needs to take clear steps with the County Council, to protect bus services from both existing and future congestion, not least to meet wider national and local transport policy.

If the plan is to meet its transport and connectivity Objectives it will have to make specific efforts to promote public transport, and take positive steps to make services more attractive. The current plan methodology, strategy and Infrastructure Delivery Plan makes no attempts whatever to do so.

“Encouraging” public transport use – which is as far as the plan aims to achieve - is an almost meaningless phrase and in reality leads to specious activity, if any takes place at all. The evidence locally and nationally is overwhelming and utterly damning: residential “Travel Plans” that do little more than point to bus timetables on the web, for services that are of little or no relevance as a choice to car owners, are simply “window dressing” to try and divert attention from the fact that plan strategies and development proposals overwhelmingly dependent on car use being maintained at least at current high levels.

By contrast **where development is directly served by high frequency direct and reliable public transport, little encouragement is needed: residents make use of it.**

6.5. Draft Sustainability Appraisal Site Assessment Methodology

With this background in view, the greatest transparency as to how the Council has sought to examine the transport and connectivity theme lies within the Draft Sustainability Appraisal (SA). Such an appraisal always tends towards being somewhat impressionistic, but we accept that no perfect methodology exists. The results of the Housing Sites Appraisals are appended as Appendix IV to the SA.

The SA report examines the housing growth separately for the Northern and Southern Test Valley areas, which is **rational and supported**. Sites in one area are not substitutable for any in the other, as they address materially different housing market demands.

We note that the sites taken forward for assessment within the SA report went through a five-stage selection process. This multivariate criteria assessment involved screening sites against a variety of thresholds and criteria, including site constraints, and consistency with the plans Strategic

Objectives. In the final event sites were appraised in the light of more detailed technical assessments submitted by site promoters.

Within the SA Report a number of transport and connectivity criteria were assessed including site access, accessibility by sustainable modes of transport, proximity to key facilities including nursery, primary and secondary schools, healthcare and community facilities, as well as connections onto cycleways and footpath networks.

We have some **major concerns with the definition of a sufficiently high-quality bus service in the methodology.**

NPPF is quite clear that sustainable modes including public transport must provide a “*genuine choice*” of modes. The National Transport Decarbonisation Plan – which is government policy – is much more rigorous in its expectations: sustainable modes need to become the “*natural first choice*” for mobility if the legally binding targets for climate mitigation by 2050 (“net zero”) are to be met. **Public transport is expected to play a radically greater role than it does today, for the aims of national as well as local policies are to be met.**

In Test Valley the baseline position with regards to public transport use is especially low even in the Tier 1 settlements - Romsey in particular, is it is substantially less self-contained for employment than Andover. Typically, between 2-3% of journeys to work are made by bus, something made evident by recent planning applications at Whitenap and Ganger Farm South. **The plan needs to robustly focus on strategies and site that allow residents of existing and new development to be presented with radically better public transport choices than those on offer today** – much more frequent than the typically hourly or half-hourly services that we can currently sustain, and ones that are faster and greatly more reliable, especially in the South of the Borough.

The SA scoring system looks to us to be **broadly comprehensive and appropriate** in terms of the matters assessed. In fact, the Council should be commended for clearly putting more thought into this than is typical for authorities of a similar geographic context.

We are pleased to see that **transport and connectivity criteria, reflected in Objectives 2) and 3) in the plan in particular, see great emphasis** in the methodology at the later site selection stages. We agree that this focus is the correct one at this stage, alongside other more local factors.

However, with the wider need to secure mode shift in mind, the following criteria “B” thresholds look extremely weak and do not represent a bus service offer that would have relevance to any other than the disabled, or those working part time, with no car able to travel after 0800, finishing before 1600 – and most critical excludes completely the post-pandemic travel behaviours outlined above, which see greatest rates of growth at peak times, early mornings, in the evening and at weekends;

- Frequent service “would include at least an hourly service, starting before 8am and running until after 4.15pm.” Rather, half-hourly service operating between 0700-1900 is an essential minimum standard to present a sufficient choice of departure and arrival times at workplaces to offer a “credible choice” in the sense of NPPF. Patronage recovery after COVID makes plain that off-peak daytime journeys, aimed at shopping and daytime social activity have seen the lowest rate of recovery in the main, compared with morning and afternoon peak and evening services.
- “within 400m of a stop” on such a service. Where truly frequent services are on offer – especially operating more than every 30 minutes – there is clear evidence that people will walk or cycle further to reach it depending on destination, directness and other factors

affecting generalised journey time. An upper threshold of 800m is probably appropriate for longer-distance inter-urban services; and 600m in urban areas.

- The role of early morning, late evening and Sunday services is crucial for both employment and other trips. The service economy is 7 days per week, especially in hospitality and healthcare. “Office hours” are kept by fewer and fewer people. **The evidence base must reflect realities of society as it currently exists.**

The application of the “frequency test” as defined above unjustifiably promotes several sites, especially around Andover, where there is a range of hourly town services, many uncommercial and which are dependent on HCC subsidy (itself subject to review and potential withdrawal from April 2025 under Hampshire County Council’s “savings Plan 2025” (“SP25”). This includes Bere Hill, Grange Farm and Manor Farm (“Enham Park”).

Following from this discussion draft Criterion H, which looks at accessibility to bus routes, certainly looks better where thresholds are chosen. We would argue that being within 800m of a frequent (i.e. better than half-hourly) service should score somewhat more highly, especially in Tier 2 settlements where bus routes are most likely to be inter-urban. This would also to help more positively justify several sites identified and taken forward in the plan. In reality, consistently achieving a 400m standard for all development sites is practically impossible. Not even Greater London offers a bus network that dense in most of its outer areas.

We note multiple references to situations where sites are within 1600m of an employment site but are discounted as no regular bus service is provided. Within these distances no bus service will provide a generalised journey time competitive with cycling or even walking and this is a spurious basis on which to discount sites.

We also find it problematic that sites are discounted if they are more than 800m from a secondary school (Criterion H). Secondary education is provided on very few sites, with even the Tier 1 settlements having only one or two sites. Where safe walking and cycling routes are demonstrable of less than 2km these should be considered highly accessible sustainable modes. 3km is well within DFES and DfT parameters for active travel. We cannot comprehend why the SA methodology chooses to use such an unreasonably tight parameter as 1600m.

A similar problem arises with primary care facilities (Criteria 3 E)). Most of the existing population of the largest settlements including within Andover and Romsey is not within 800m of such a facility – which one trusts, ought not to be one that the vast majority of residents need to use too regularly, quite unlike convenience retail or schools. The economics and practicalities of primary care provision are strongly favouring consolidation of such facilities and this trend has been ongoing for at least 20 years. Even a 1600m distance seems a little strict in this light.

6.6. Results of the SA Site Assessment - General

Clearly, applying the adjustments to the methodology we set out above will have material impact on the relative ranking of sites in the multivariate criteria analysis. A number of sites served by weak and lower frequency services could slip down the rankings, while others would no doubt be promoted, where existing services are more frequent.

However, **the SA Assessment fails in any way to assess the credible potential for reinforcement of bus services**, associated with development.

This is **a result of a much more serious deficiency in the methodology in that it fails to properly or consistently take into account the credible evidence that the developments themselves would be**

able to address a very wide range of current apparent deficiencies when accessibility to key services and facilities by sustainable means is concerned. This is particularly applicable to larger opportunities where a substantial level of on-site self-containment could be anticipated, either considered “solus” or where the pattern of service delivery has regard to existing neighbouring development and the combined opportunities that these present. This situation exists despite the fact that the five-stage process is said to have drawn on technical evidence submitted by site promoters.

To assist the Council, we set out for the “preferred pool” of sites which opportunities to reinforce bus services exist.

However, a more detailed appraisal to help inform the preparation of the Regulation 19 plan, is something that warrants more in-depth discussion with each of the major operators, and Hampshire County Council, in a manner that reflects the explicit expectations set out at NPPF paragraph 15 c).

Moving beyond this additional layer of evidence, a proper and consistent approach to evaluating development opportunities based on the actual scale of the opportunity – including across multiple adjacent sites in separate control forming part of a logical unified allocation, is also essential.

We therefore find the way in which the assessment results have been applied to selecting sites exceptionally hard to follow at times, both in Northern and Southern Test Valley. We recognise that a degree of interpretation is judgment is involved, and a large number of criteria need to be balanced. However, the methodology essentially screens out all sites with significant constraints, whether physical, environmental or policy, at earlier stages; thus, assessing those remaining starts to focus more clearly on a more limited number of opportunities and constraints.

6.7. Results of Site Assessment – Test Valley North

Looking at Test Valley North, and the transport and accessibility criteria 2 and 3 in particular, the obvious difficulty surrounds the omission of Finkley Down Farm, East of East Andover. The site demonstrably is in strong conformity with the spatial strategy, being adjacent to a Tier 1 settlement, which is sequentially preferable to a Tier 2 settlement which the spatial strategy considers to be less sustainable from first principles. In its scoring it performs negligibly different to allocated land at Bere Hill and Grange Farm, and greatly better than large allocated sites, especially South East of Ludgershall.

Furthermore, as an integrated extension to the existing master-planned strategic allocation at East Anton, very close to completion, Finkley Down Farm does not in the least struggle to secure integration with the existing built-up area, and its facilities, as Bere Hill in particular does. This includes existing school, recreation and local centre facilities immediately to the west.

The promoters have had significant early discussions with Stagecoach, as the principal local operator. Service 6 could be readily extended into the site. This already operates every 30 minutes on a commercial basis and is earmarked for further kickstart investment under Hampshire CC’s 2024-26 Bus Service Improvement Plan 2 funding scheme. The service is already one of the three most secure and frequent town services. There would be credible case to seek to uplift the frequency of this service to every 20 minutes.

Finkley Down Farm contrasts favourably with Bere Hill. There, adjacent strong commercial bus routes able to serve the development effectively are very much harder to identify, and the movement and access strategy for bus needs a great deal of further work, as the draft plan text comments and we discuss this in our site-specific comments in due course. A Finkley Down Farm development also

would benefit from immediate proximity and priority access by sustainable modes to one of the two largest employment areas in the town.

Taking this into account, and looking at a high level summary of accessibility scoring we set out below, we conclude that a more accurate assessment would place Finkley Down Farm at, or even ahead, of all the other opportunities in the “preferred sites pool” adjacent to Andover. It is substantially better located than other draft allocations, based on existing scoring. It is very hard to see the basis on which a site that Council considers highly sustainable in transport and connectivity terms at Finkley Down Farm through its own evidence - and which appears to be otherwise relatively unconstrained – has been entirely set aside.

Rather the Council is pursuing by far the largest quantum of development in the Northern area southeast of Ludgershall, which performs much more weakly. While these scores will no doubt be adjustable upwards as proposals come forward, that offer a degree of self-containment, this looks very likely to be very hard for the council to coherently defend at an Examination in Public.

Given the lack of other significant assessed criterion that would obviously otherwise downgrade the opportunity, **the omission of Finkley Down Farm, East of Andover, looks likely to be very hard to justify in subsequent stages of plan development.** We invite the Council to seriously reconsider this opportunity.

Table 1: Comparative assessment of shortlisted “North” sites in the Sustainability Appraisal, Transport and Accessibility Strategic Objective Criteria 2/3/11

	Allocation Ref	Assessed Capacity ¹	Tally ++ scores “strongly +ve”	Tally + scores “positive”
Land at Bere Hill	NA6 East	450	8	3
Finkley Down Farm	Omission	1,450	8	1
Land at Bere Hill Farm	NA6 West	700	4	2
Land at Manor Farm “Enham Park”	NA4	1,000	3	6
Land East of Ludgershall	NA7	350	3	3
Land South of A342	NA8	1,500	2	2

6.8. Results of Site Assessment – Southern Test Valley

In the southern part of the Borough, the disposition of the opportunities and the nature of constraints means that the evidence presents a picture that is rather more complex to interpret. The constraints on the edge of Romsey do evidently suggest a range of credible options. However, a quite intricate tapestry of localised issues impinge on many of them, including but not restricted to the nature of the existing urban edge, topography, land control, and protection of local biodiversity and habitats.

Unlike Andover, Romsey is also not of a size that supports a local internal town bus network. The town is also situated much closer to other significant settlements. Within the Borough these are classified as “Tier 2” but in most cases the built-up areas of Southampton and Eastleigh abut the Borough in these locations, such that this classification is blind to the nature of cross-boundary

¹ Does not necessarily reflect allocated capacity assumed.

interaction. Nevertheless, patterns of movement reflect lesser self-containment and the majority of the bus network is offered by longer-distance inter-urban services, in effect supporting trips out of the town as well as within it.

The methodology screens out sites that tend to cause coalescence at an earlier stage, so the remaining sites in the “preferred site pool” are not considered to present this issue.

The majority of the selected sites perform relatively well in sustainable accessibility terms, as would be expected. The greater number of larger and more sustainable settlements in the south of the Borough compared to the North area presents a greater array of clear opportunities, as well.

Table 2: Comparative assessment of shortlisted “South” sites in the Sustainability Appraisal, Transport and Accessibility Strategic Objective Criteria 2/3/11

	Allocation Ref	Assessed Capacity ²	Tally ++ scores “strongly +ve”	Tally + scores “positive”
Land South of the Bypass, Romsey	SA5	110	10	3
Halterworth, Romsey	Omission	1,150	9	3
Velmore Farm	SA6 East/South	See below	10	2
Velmore Farm/S of Castle Lane	SA6 West	1070	9	3
Ganger Farm Ph 2, Romsey	SA4	340	7	3
Packridge Farm North Baddesley	Omission	150	3	4
Upton Triangle	SA8 employment	100	4	0
Land at Upton	SA8 employment	380	1	4
Land to north of King Edward Park, West of Chandlers Ford	SA7	44 (C2)	1	3
Brentry Nursery	Omission	250	0	5

The immediate proximity of the leading site to Romsey town centre (SA5) naturally leads to this opportunity being scored highest.

The sustainability credentials of Velmore Farm/Castle Lane (SA6) are also well reflected in the scoring as we would expect. It must be pointed out that the methodology is extremely generous where bus service frequency is concerned and thus this opportunity actually scores better based on the current situation that we consider justified. However, we strongly endorse the draft allocation, as we elaborate elsewhere, subject to this service uplift being deliverable.

It is nevertheless far from clear how certain sites were excluded from this very limited preferred pool of sites, given their scores, especially those that most closely conform to the spatial strategy being located at and directly adjoining Romsey.

² Does not necessarily reflect actual allocated capacity.

The treatment of Halterworth within the preferred pool, which seems to fall across three separate SHELAA site references, **is especially hard to grasp**. The scale of the opportunity clearly presents itself as a strategic one. However, the sites have each been assessed discretely, which unreasonably and illogically skews the results. Comprehensive development across a clearly defined area as an urban extension to Romsey, with its boundaries extending as far as Highwood Lane to the east, looks entirely rational as an assessable option.

This combined block lies adjacent to an established primary school and immediately north of the most frequent public transport corridor in Romsey on Botley Road. Service 4 and 5 both currently use this offering direct connectivity to both Southampton, Chandlers Ford and Eastleigh via multiple intermediate points within a highly competitive bus journey time. The Mounbatten School is a very short distance to the south offering secondary education. Where employment is concerned the site relates immediately to Abbey Park Industrial Estate which this plan proposes for further expansion on two sites, as well as North Baddesley and Chandlers Ford, the latter directly accessible by Bluestar 5 on a service that we anticipate justifies substantial frequency reinforcement, as we explain elsewhere.

The scale of the development means that any immediate lack of connectivity to a wider range of convenience retail – much of the site is already well within reach of Whitenap Spar - and day-to-day facilities such as a medical surgery would be likely to be addressable on-site.

We are further very concerned that the scoring undertaken seems both extremely inconsistent and at times shows clear evidence of errors. The effect of this is to systematically further under-represent the credentials of this site, to a material extent:

- **Land at Lodge Farm, Romsey**, capacity 355 dwellings SHELAA Ref 139,
 - 3 B) nearest Strategic Employment site is Abbey Park Industrial Estate, due to be expanded further, within 1000m
 - 3 H) The proximity of Bluestar 4 and 5 ought to credit the site with ++ not single +; these are acknowledged to be within 400m
 - 3 I) No access constraints are demonstrable on an extensive frontage
- **Land at the Corner of Highwood Lane and Botley Road** capacity 175 dwellings SHELAA ref 282

3 A) within 700m of Chatterbox Nursery, thus + not +/- ; likely to be substantially closer with internal connectivity as part of a comprehensive development.

3 B) within 700m of Halterworth Primary School thus + not +/- ; likely to be substantially closer with internal connectivity as part of a comprehensive development.

3 C) within m of Spar Whitenap thus

- **Land Off Highwood Lane** capacity 230 dwellings SHELAA 356
- **Land south of Highwood Lane** capacity up to 400 dwellings SHELAA 370

The assessment of these sites under Criteria 2) and 3) as part of a comprehensive master-planned urban extension would be likely to arrive at substantially more positive conclusions even before consideration were made of the provision of key services and facilities on-site.

We invite the Council to very strongly reconsider the Halterworth opportunity as it is demonstrably a great deal superior to the proposed allocation at Ganger Farm Phase 2, or any other option adjoining Romsey apart from that South of the Bypass.

It is also a little difficult to follow how the employment allocation at Upton (SHELAA 394) (SA8) has been made, when the evidence of the SA indicates that it was ruled out as being part of a wider “new settlement” promotion. There is no mention in the SA of its inclusion in the preferred pool. A larger site immediately adjacent to it (SHELAA 385) scores very differently on transport and connectivity criteria, for reasons that are impossible to follow.

Several sites in the **southern fringe of the Borough adjacent to the Tier 2 centres of Rownhams/Nursling** and the even larger city of Southampton, perform exceptionally well in transport terms and the evidence of constraints or other harms seems inconclusive in many respects:

Fields Farm, Rownhams (SHELAA): capacity up to dwellings) 8 ++ 2+

Criterion H: Bluestar 4 is well accessible within a short distance, and this has been entirely discounted. St John’s Church where there is direct walking route of **350m. This should score strongly positively.**

Parkers Farm East Rownhams Lane (SHELAA 201) capacity up to 290 homes

The nearest stop Routs Way 680m away is further than is desirable, but the service offered by Bluestar 4 is one of the most frequent in the Borough and journey times to multiple key employment destinations in Southampton have been entirely and justifiably discounted.

7. Positively planning to meet Development needs

The Levelling Up and Regeneration Act 2023 makes provision to abolish the statutory Duty to Cooperate when regulations permit. It will be replaced with an ‘alignment policy’ although details on content and timing of the replacement policy are not currently available.

The draft plan indicates that the Council has considered through its approach to the draft plan and its policies should contribute to:

- Helping to meet housing needs across South Hampshire
- Helping to meet employment needs across North and South Hampshire
- The cumulative impacts of residential development on the international nature conservation designations of the New Forest, the Solent, and Salisbury Plain
- The cumulative impacts of additional nutrient input from new development on the Solent, River Avon and River Itchen (para 2.21)

We note that the draft plan text includes the following statements that refer to the context of the southern part of the plan area, as part of the Partnership for South Hampshire (PFSH) area within which a comprehensive Spatial Position Statement (SPS) has been agreed between all the participant planning Authorities, including Test Valley Borough Council:

“In the SPS, broad areas of search are identified which could be considered in the future to help address any remaining shortfall in supply. Whether these sites are progressed, is to be considered and decided by each of the individual Local Planning Authorities through the preparation of the respective Local Plan. 2.19”

“This has informed the policies within the draft Local Plan 2040 and provides evidence that the Council has met the legal duty (to cooperate”. 2.22

Alignment of the spatial strategy with wider transport objectives, opportunities and constraints

There is no mention of transport and mobility factors in this discussion, despite the fact that NPPF is explicit that transport and infrastructure issues are among those themes that cross-boundary collaboration is likely to need to have regard; and that transport is a major theme within NPPF, to which plan-making must equally pay proper attention *“from the earliest possible stage”* (NPPF paragraph 108).

7.1. PfSH Spatial Position Statement

A revised Spatial Position Statement (SPS) for the sub-region, for the period to 2036 was published in December 2023. This work is the latest expression of a strong history of cross-boundary partnership and collaboration in a complex geography, going back almost 20 years. However, since multiple changes in national legislation and policy have weakened the requirements for cross-boundary collaboration substantially, we note that the latest SPS is far less robust than the kind of work done at the outset of the Partnership.

Reading section 3 of the SPS, there is **no agreed strategy or evidence base that is related to transport**. Given the degree of spatial interaction between southern Test Valley and Greater Southampton – including Eastleigh Borough – and also towards Winchester City, this is of considerable concern. These patterns of movement to a great extent reflect substantial imbalances between local housing and employment markets, the most obvious expression of which is in house price gradients. Many serious transport problems across the PfSH area, including high and rising car dependency, extensifying spatial interaction and increasingly chronic congestion, arise from this. Air Quality remains an issue, too, related to the primary road network and national Strategic Roads Network (SPS 3.21). Air quality breaches are heavily reflective of serious traffic congestion as well as high emissions volumes.

Fig 2 of the SPS makes plain that “Footnote 7”³ constraints around the principle urban areas of the PfSH are very extensive indeed. However they also show that these constraints bind least in southern Test Valley, or any part of the PfSH area that is located within very close proximity to the main social and economic centres of Southampton, and its port. The ability to provide effective public transport solutions to meet the future mobility needs of the PfSH area, as well as within southern Test Valley, is heavily sensitive to pursuing patterns of development that are compact, reducing journey distances. This is also much more likely to allow for cost-effective delivery of high-quality active travel infrastructure, which given the nature of the area, is most likely to require some off-highway delivery.

At 4.7 and 4.8 the SPS posits a further range of constraints on the wider strategy, which centre around the desire to maintain significant undeveloped “countryside” areas between closely spaced settlements, to preserve their separate identities.

This desire has been an extremely strong feature of planning strategies in much of the PfSH area for many decades. However, it has tended to push development strategies ever further north, and away from the M27 and the edge of the core of the city region. Applying this constraint as shown at Fig 3

³ Referring to the footnotes to Paragraph 11d in National Planning Policy Framework. These set out the designations against which the presumption in favour of sustainable development does not apply.

appears to sterilise many of the more obvious otherwise unconstrained options closer to the socio-economic centre of gravity and to key public transport routes. This is acknowledged in the SPS at 4.8:

“It is important to note that much of this land is amongst the least accessible, being furthest from key destinations and public transport routes.” (our emphasis)

The correct further conclusion to draw from this, is that the **reduced range of unconstrained development options presents a much-reduced range of sustainable development options.**

We are seeing the impacts of this with acute scarcity of credible public transport mode choices at allocated sites at North Whiteley (City of Winchester), Boorley Green, and “One Horton Heath” (Eastleigh Borough) where weak hourly bus services are all that can be offered at this stage, with only single peak journey choices because the already-low frequency must open out to account for severe traffic congestion. We cannot offer journey times that are remotely competitive with driving, either.

Bluestar has looked carefully at incorporating North Whiteley in its operations but has recently had to step back again because its relative remoteness, traffic congestion and high level of existing car dependency militates so strongly in our view, against being able to provide a service that is effective in securing sufficient patronage to be commercially sustainable. We are in deep discussions with EBC about how to serve One Horton Heath, which will be achievable, but relatively costly.

It is thus vital that the Local Plan pursues those options in the PfSH area that remain outside these additional policy constraints and locally determined designations, that are well related to existing and potential improved bus corridors and immediately accessible to the larger centres of activity and services. Examination of fig 3 of the SPS confirms that significant areas exist within Test Valley that would represent such opportunities, south and east of Romsey, and immediately adjacent to Chandlers Ford.

It is thus entirely correct that the SPS sets out at section 5.1 as the first principle, that after looking at urban intensification first, spatial strategies outside the core cities will need to accommodate additional land to meet development needs, and that **sustainable transport and mobility considerations should be the primary basis on which otherwise unconstrained sites should be evaluated:**

“Increasing housing need means that more sites are required and these cannot be provided solely within the existing urban areas. The PfSH LPAs will have to consider greenfield locations that support modal shift...” (our emphasis)

This actually sets a very high bar for this round of plan-making. **Locations that can support a radically higher mode share for active travel and public transport use are going to need to be located and designed very differently indeed from those that have been promoted and come forward over the last 40 years – indeed even in the last 10-15 years.** It has to be stressed that the mode share for public transport in almost all these developments is pitiful – among the lowest of any built up areas in Europe, not only the UK. This arises principally from their location, and also from their urban design, that has strongly frustrated the creation of simple, direct, congestion-free bus routes, linking to key offsite destinations.

From so low a base, simple arithmetic makes plain that to achieve even a few percentage points transfer from car to active travel or bus, will demand huge proportionate increases in sustainable mode use, not only from new development, but even more importantly, from the much larger numbers of existing residents.

Only a suitably robust comprehensive and aligned land use and development planning strategy can achieve this.

Policy SPS 1 (2) therefore states:

*“Achieving the transition to net zero carbon will require a fundamental modal shift in transport to zero and low carbon travel, including active travel and public transport. **Site selection and capacities will need to be optimised to promote modal shift and avoid car dependency where possible.**”*

SPS1 (5) continues:

*“**Growth will be focussed in existing urban areas with ‘cities and towns first’ and/or in locations that support modal shift in transport.**”*

Within TVBC, there is no apparent reason to us why this should not be possible. To accord with the SPS, which is the foundational expression of and evidence for of the Duty to Cooperate, the Local Plan must therefore place the delivery of high quality sustainable travel connectivity and delivery at the heart of its Vision and Objectives.

At section 5.9 SPS concludes again, that for each local plan produced subsequent to it:

“ 5.9. A range of local plans are likely to contain a combination of small and larger, strategic sites, depending on the needs and opportunities within each authority. Whilst decisions on which sites to allocate and the form that development takes will rest with individual LPAs, the PfSH authorities recognise that optimising site selection and site capacities can provide opportunities to promote modal shift and avoid car dependent development.”

This is then carried through into SPS2:

*“The PfSH authorities will support the implementation of plans and strategies to accommodate the most sustainable forms of development at the sub-regional level and within individual local plans, **having particular regard to the transport implications of new development.**” (our emphasis)*

As such the SPS is explicit, clear and, indeed, emphatic, about the need for sustainable mobility opportunities to steer the spatial strategy and, then, urban design. This singular emphasis on the transport implications for development strategies and urban design is a weightier one that we have typically seen locally or indeed, much more widely in England.

These conclusions then feed through into the principles and rationale expressed in para 6.17-6.19 of the SPS. We heartily and unequivocally endorse these statements:

*6.18. Brownfield sites within the existing urban areas present the best approach for achieving transport orientated integrated development that supports sustainable and active travel. However, accessible greenfield sites outside of the existing urban areas will also need to be considered. **As distance increases between development and key trip destinations the viability of road-based public transport decreases.***

*6.19. Development on greenfield sites is less likely to reduce car use, often due to their location away from urban areas where public transport services are less frequent or active travel routes are longer. To avoid locking in car dependency, **planned new developments (alone or in combination) should be of sufficient scale and density to help make active***

travel choices a natural option and make public transport services viable, or be located to connect to existing services and to support the provision of new retail/community facilities. “

We stress the veracity of these statements, and the conclusions drawn. **Transport matters will need to steer this local plan at least as strongly as the designations and other planning constraints have done, and will do. This will be entirely unprecedented in the City Region and very unusual even looking nationally. It is absolutely crucial that it does so.**

7.2. Meeting Housing and Development needs in full

The SPS also reflects the need to **fully meet housing and development needs across the SPS area**. This reflects the separate clear expectations set out in NPPF at paragraph 61 that explicitly maintain the ongoing need to address a crisis not only in housing costs, but in availability at any cost, however high. Given the effects of critically constrained housing supply on recruitment and retention of staff in all service occupations and sectors including our own, there would need to be overwhelming evidence presented at the point that the plan is submitted for examination, why the Borough’s needs were not met alongside a suitable contribution to meeting unmet needs from the City of Southampton.

The period of the SPS runs from 2023-2036. This does not cover a period that will extend beyond the adoption date of the plan by at least 15 years, as NPPF and national legislation requires. Rather, the estimates extend 10 years ahead – and may well be less should preparation and examination take any longer than the very ambitious estimate of a 2026 adoption date.

The needs set out in Table 1 of the SPS are not therefore, a basis on which to conclude there are no unmet needs for housing arising from the City of Southampton. Rather, the figures already reflect an extremely high assumption regarding “windfalls”, ambitious assumptions about delivery (and deliverability) of existing commitments, overwhelmingly in the city centre many of which are clearly highly challenged for viability⁴, and a small number of large opportunities on previously developed land, that exhibit all the usual challenges associated with such sites.

Leaving the entirely arbitrary 35% housing requirement uplift slapped on the City by ministerial *fiat*, with absolutely no evidence of its achievability or appropriateness⁵, the SPS makes no attempt to look to 2041 as it should, whereupon it seems highly unlikely that the kinds of urban capacity that are identifiable today will be followed by similar quantities of development land on existing development sites. These existing sources of supply, much of it hypothetical on unidentified “windfall sites” if delivered, will no doubt have largely exhausted the opportunities entirely. It also looks very clear that such supply will fail to deliver against a full range of housing needs. Indeed, much of the identifiable supply in Southampton is not merely for small self-contained apartments, but, increasingly, for student accommodation against which existing family housing stock can be released on a pro-rata basis; and micro-dwellings (“co-living”), which addresses a very limited demographic.

There is also an immediate pressing deficit apparent in New Forest District, despite a relatively up-to-date Local Plan. Test Valley adjoins this area, and is the closest authority that could help address this need in a sustainable manner. This is assessed at a 5,653 unit deficit by 2036. While an imminent review of the NFDC Local Plan will look to address this within the District as far as possible, this looks

⁴ Evidenced by multiple lapsed permission and a clear tendency for committed sites to see multiple successive re-applications for development over an extended period, without anything actually being built.

⁵ We do not consider that this uplift is realistic, deliverable, or practically meaningful. Its ongoing retention in national policy is speculative in the medium term.

highly unlikely to fully meet the needs, especially when a further quantum to meet needs 15 years beyond adoption is added.

Looking beyond 2036, the SPS examines and suggests appropriate areas for further growth and these are set out at SPS8. Within Test Valley, these include:

- East of Romsey
- South West of Chandlers Ford

However, paragraph 6.42 makes plain that these options are neither secured as sound allocation nor do they represent an exhaustive list of appropriate options for development:

“The broad areas of search will be considered alongside other options for growth put forward in the preparation of individual local plans. While they will potentially make a significant contribution to accommodating housing needs, further sites will still be required across South Hampshire. ...”

Nor is there any real attempt made in the SPS to look at what allocation to address unmet needs that might be required in any part of the PfSH area. While naturally, any identified supply ought initially be assumed to be hypothecated to meet endogenous needs, as assessed initially through the Standard Method, the question of how these wider housing requirements are likely to be sustainably planned for across the PfSH area seems to have been ducked.

Thus the SPS cannot be considered to be the end of the matter, whether locally-derived housing supply from within Test Valley is concerned, nor the wider needs in the PfSH area.

8. Plan Vision

Despite the declared Climate Emergency, and the clearly stated national policy set out in the National Transport Decarbonisation Plan that spatial plans should directly and intentionally align with transport plans and their objectives to substantially mitigate carbon emissions from transport, the Vision fails to grasp the significance of the plan for achieving much more sustainable patterns of movement, and supporting a radical shift in transport and connectivity towards more sustainable modes.

It is a matter of some concern that there is nothing stated in the Vision that clearly steers the plan towards this or the requirements of Chapter 9 of NPPF at all.

It is entirely appropriate to signal that by the end of the plan period, the District will have secured a step change in the provision and use of active travel and public transport.

9. Plan Objectives

These ought to relate directly to the requirements set out in NPPF and be locally specific.

In addition, in the southern part of the Borough, the Objectives need to be very closely tied back to the principles articulated in the SPS.

There needs to be a very significantly greater emphasis on the role of transport and sustainable mobility pointing back to a modified Plan Vision, as well as within the plan's Objectives, pursuant to

both NPPF and the SPS, as well as the expectations set out in the National Transport Decarbonisation Plan.

Furthermore, given the very significant, and rising role in carbon emission played by mobility, if the Council is serious about doing all it can to mitigate carbon, and have a significant impact through its planning function on the Borough's emissions, then tying the spatial strategy and allocations tightly to mode shift to active travel and public transport will effect a much greater impact than attempting to squeeze ever-diminishing returns out of the specification of new buildings, that from February 2024 will all need to be net-zero in any case to meet national legally-binding building regulations – irrespective of their location.

We regret that the plan does not reflect this strongly enough in its draft Objectives. The Objectives in this are weakly expressed and will accordingly fail to justify and secure a plan strategy that achieves meaningfully different outcomes than previous approaches taken over the last 40 years.

9.1. Transport and Movement

Naturally we acknowledge and welcome that the Objectives make specific reference to transport in the following terms:

“Encourage active and sustainable modes of transport, that are accessible, safe and attractive to use, whilst also seeking to reduce the impact of travel in particular by private car. Ensure new development facilitates improvements to accessibility, safety and connectivity in our transport infrastructure.”

This language makes **no commitments** and has **no clearly defined outcomes**. Clearly, the Council is looking to show it has addressed the matter, while being quite equivocal about what it actually wants to achieve. This means that the plan is likely to be ineffective and inadequately evidenced, and thus unsound.

The draft plan acknowledges its vital potential impact in the area of transport carbon mitigation:

“By increasing the availability, connectivity and attractiveness of more sustainable modes of transport the Local Plan 2040 can help to contribute to the goal of net zero carbon development.” (paragraph 2.66)

...

“Focusing development in the most sustainable locations and using the 20-minute neighbourhood principles can help to reduce the need for travel and therefore its impacts. It can promote opportunities for increased use of sustainable modes of transport, including walking and cycling, and can help to help to make places more attractive for people. This aligns with the overarching themes in the Draft Hampshire **Local Transport Plan 4** (HCC, LTP4). **This proposes supporting a shift from planning for vehicles, towards planning for people and places**, decarbonising the transport system, reducing reliance on private car travel and promoting active lifestyles whilst supporting sustainable economic development and regeneration.” (paragraph 2.68)

However, the draft objective does not clearly follow through to ensure that it does in fact achieve this goal or align clearly and unequivocally with draft LTP4.

We welcome the recognition of the importance of transport and mobility set out at paragraph 2.65, but as far as it refers to public transport we fear that it leads the reader to conclude that the baseline position is better and more comprehensive than it actually is:

*“An efficient and integrated transport network is important to help deliver sustainable economic growth, reduce congestion, and to enable residents and visitors to enjoy good access to services. Test Valley is well placed in this regard, enjoying a good strategic road and rail network, access to local airports and ports **and a wide range of local bus services**. However, some of our rural areas, have limited access to public transport. Car ownership in the borough is higher than the UK average and most journeys in Test Valley are made by private car.”*

It is becoming increasingly hard to sustain small urban bus networks such as in Andover, much of which has been provided under public subsidy for many years. While the network has a comprehensive appearance on paper, many routes have very limited frequencies, poor or unsuitable hours of operation and provide very limited appeal to anything but “last-resort” patronage – those who have no realistic alternative mode to use. Even so, this limited network is under threat of survival under Hampshire County Council’s SP25 budget Savings Plan and many of the less frequent routes and links on the margins of the town may well be lost.

In Romsey, the town is dependent almost entirely on inter-urban bus links to Southampton, Chandlers Ford/Eastleigh, and Winchester. While these are regular, again, frequencies are no more than every 30 minutes and many run hourly through the Romsey suburbs. There are obvious opportunities to consolidate and reinforce these links, including substantial frequency uplifts, that start to make these services much more relevant for a much broader range of journey purposes. These include Bluestar 4 (B*4) to Southampton. Bluestar 5 (B*5) to Chandlers Ford/Eastleigh and Stagecoach South 66 (SCS 66). There is an additional important link operated several times a day from Romsey to Southampton via Totton as Salisbury Reds service X7R, that separately warrants uplift to support plan led growth in New Forest District, although this will be more challenging and costly.

With the exception of the jointly operated Active8 between Andover Ludgershall and Tidworth, continuing to Salisbury; and the Stagecoach 76 to Whitchurch and Basingstoke, what relatively few remaining services are typically infrequent and dependent on County Council financial support, which under the proposals set out in SP25 might well be withdrawn by Summer 2025. This means that in practice, very few rural settlements indeed have a meaningful public transport offer.

This includes Stockbridge, which despite being a tier 2 settlement now has only two or three departures per day to Winchester and Andover all offered off-peak; and Kings Somborne, where allocations are proposed, that has even less provision.

With this in view, we would concur strongly with the conclusion of the following paragraph:

*“Facilitating access to public transport, enabling an increase in sustainable movements and use of low carbon transportation along with having large rural areas in the Borough, have been highlighted as important to our communities through consultation response. **This presents significant challenges for the Local Plan 2040.** (2.67a)*

We agree. **The plan strategy itself will be the key that most effectively unlocks this aspiration.** It will require a very clear focus on a limited number of key rural bus corridors where there might be scope

to secure hourly services were sufficient and quite substantial population and services to be allocated on them.

Given the secondary school in Stockbridge, and the existing size of Kings Somborne, this might be one candidate, on a route between Andover and Winchester. It should be noted that significantly more attractive bus services running every two hours were in place through Stockbridge as recently as 2014, before being curtailed under successive County Council spending reviews. Another might be the route between Andover and Salisbury via the Wallops, including the substantial military base. However, such an approach would itself be quite a “long shot” literally as well as metaphorically speaking. Various constraints as well as political acceptability of development on a sufficient scale might well make this unachievable.

We welcome that the Council recognises the key role of collaboration in securing the plan’s transport and mobility objectives:

*“Partnership working with key stakeholders will assist in the delivery of this objective including with Hampshire County Council, Network Rail, and public transport providers.”
(para 2.67b)*

However, partnership working will not change the fundamental realities of supply and demand of public transport services. **The Plan must be informed by a realistic appraisal of what the art of the possible is, rather than mere aspiration.** NPPF expects all aspects of the local plan to be demonstrably deliverable.

IN the light of the above, we consider that the draft **Objective should be restated with a clear and explicit focus on securing a substantial change in wider travel behaviour**, including through mode shift to active travel and public transport. NPPF already expects sustainable modes to offer a “*genuine choice of modes*” that compete effectively with personal car use. With the declared climate emergency in view, even more importantly, the plan should seek to ensure that it is directed at making them “*the natural first choice*”. This is now national policy, expressed in the National Decarbonisation Plan or Transport. It is deeply regrettable that government has not yet translated this language directly into NPPF at chapters 108-109. That in no way precludes the Council from responding appropriately to this substantially more rigorous national policy objective, that is also already clearly reflected in the draft Hampshire County Council Local Transport Plan Review (LTP4).

A restated objective would more appropriately read as follows:

*“Encourage **Catalyse a significant shift to use of** active and sustainable modes of transport, **by ensuring development is located and designed make them** accessible, safe and attractive to use, whilst also seeking to reduce the impact of travel in particular by private car. Ensure new development facilitates improvements to accessibility, safety and connectivity in our transport infrastructure **and services.**”*

10. The Spatial Strategy

The current Local Plan is clearly out-of-date, being adopted in 2016. The evidence base for it is likewise over a decade old.

This has been updated in the Spatial Strategy Topic Paper, published alongside this consultation.

The conclusion of this work is that:

“Overall, this supports focus at our two market towns with a wider distribution of development to a larger number of settlements. Enabling growth at a larger number of settlements including at our rural communities was supported through responses received to previous consultation documents”.

This included responses on behalf of the bus operators at Reg 18 (1) which also drew the broad conclusion that insufficient sustainable opportunities existed adjacent to the largest and most sustainable settlements to meet development needs. In particular, sites that would support rational extension of bus routes, or easy use of existing ones, were exceptionally hard to identify. It is exactly these kinds of sites that will be essential is the Local Plan is to secure “mode shift” away from already high levels of car dependency. Not all mobility needs can credibly be met by active travel. This led us to conclude that development needs would require addressing at a wider number of settlements, or, conceivably, one or more new or expanded settlements; all directly related to existing or potential high quality public transport corridors.

The strategy thus involves:

- Maximising the capacity of regeneration opportunities in **Andover and Romsey town centres**. As well as meeting housing needs this would support the evolution of these centres as hubs for social engagement and interaction, including leisure and entertainment, reflecting the decline of high-streets as retail centres. Subject to ensuring that facilities for buses are maintained and as far as possible improved, **this is supported**. We note that there are specific proposals to redevelop and improve Romsey Bus Station, while Andover Bus Station was substantially improved and enlarged within the last 6 years, pursuant to allocations made in the current Local Plan.
- Additional greenfield sites adjoining Andover and Romsey. The logic for this is clear, and, **broadly supported**. However, we have serious concerns that providing relevant public transport choices to some of these opportunities will be practically impossible. In those cases, it has to be assumed that NO public transport would be offered, and that, accordingly, the only credible alternative to car use would be cycling. The topography of many of the areas adjacent to the largest towns makes cycling challenging. Some of the distances involved are credible for confident and fit cyclists, but there needs to be a sober recognition of the relative attractiveness of cycling against car use even for short local journeys.
- “An appropriate level of development at our largest range of sustainable settlements where there are key facilities.” **Broadly, this is supported, subject to these facilities including a relevant public transport choice**. There is a clear challenge here in that beyond the main towns, the density of the commercial public transport network is very low. Furthermore, consultation is ongoing about ceasing the funding of those much more limited bus services that are funded by Hampshire County Council. These could very well be wholly or partly withdrawn. Salisbury Reds X7 between Salisbury and Southampton, including the X7R branch operating through Whiteparish and Romsey, falls into this category. If sufficient additional development were allocated on this route, that could form the basis to see this corridor strengthened rather than removed. However, this would imply a substantially larger development quantum than the plan, or indeed local communities, is likely to consider appropriate.

However, the draft Spatial Strategy text makes no mention, at all, of either securing mode shift away from car dependency. Nor does it mention public transport at any point – only “active travel”. While

all bus journeys start and finish with a walking journey, and increasingly with a cycling journey, the typically accepted definition does not include public transport.

The plan's spatial strategy, and the approach to allocations that follows, is clearly and intentionally set up to be oblivious to need to maximise the opportunities for public transport use, despite the principles set out in NPPF Chapter 9 paragraph 108-109 and the quite intense emphasis on just this principle in the PfSH SPS.

Naturally, this kind of approach opens up a much wider range of development options, that can be justified on the basis of 100% use of personal vehicles: cars, and cycles/micromobility. It is extremely easy to claim, based on very broad and extremely generous parameters, set in DfT guidance, that allow for all journeys up to 5 miles in length to be made by cycle. However, this guidance is curiously blind to the fact that nationally, a very small proportion of journeys of such lengths actually are; and worse, in the context of this particular plan area, there are a very wide range of factors that explain why the active travel mode share is particularly low across much of the plan area. These factors are likely to make greatly raising that mode share that much harder to achieve.

The plan thus makes no obvious efforts to reorient the spatial development pattern of the area around sustainable mobility any more so than the 2016 Local Plan does. By persisting with this approach, the overwhelming conclusion must be drawn that the same highly car-dependent outcomes will result.

The plan as drafted is therefore likely to be considered unsound being:

- **Out of conformity with the expectations of NPPF** paras 108-109, that explicitly requires plans to pursue patterns of the development that make the fullest possible use of public transport; and the PfSH SPS principles at SPS 1 and 2, that even more emphatically express the need to pursue spatial patterns of development that secure mode shift and towards public transport in particular
- **Ineffective**, in that transport mitigation strategies will be excessive reliant on providing additional capacity for private cars, and may well struggle to arrive at credible strategies to make active travel a "genuine choice" for large numbers of trips as NPPF requires.
- **Inappropriately and inadequately evidenced**, in that the plan does not attempt to sufficiently identify and take advantage of the opportunities for public transport.

Following from the need to clearly refashion the Plan Vision and Objectives to align with NPPF and the SPS in this regard, as we set out above, the **draft spatial strategy should therefore be amended as follows:**

- *"Supporting **where necessary, delivery of** new or improved infrastructure **and services** which positively responds to its setting, local needs, and our changing climate, **and facilitates carbon mitigation, in particular for local mobility.***
- *Promoting access to the countryside and conserving and enhancing the Borough's diverse landscape character*
- *Providing developments that ~~promote~~ **secure substantial mode shift towards** active travel **and public transport** and invest in infrastructure **and services** ~~to enable clean travel that reduces our impact from travel~~ **that robustly and credibly secures the highest possible use of low and zero-carbon travel modes both from existing and new developments "***

11. The Settlement Hierarchy

At the very outset the draft plan states that the settlement hierarchy is the basic driving factor behind the spatial strategy:

“This is key to delivering our spatial strategy as it guides the scale and type of development that is considered appropriate at each of the settlement tiers.” (para 3.2)

This approach is based on a broadly incontrovertible but very general premise that the largest settlements are the most sustainable.

We note that the settlement hierarchy follows quite clearly from first principles, and it exposes the fact that the hierarchy is itself quite thin and skewed, reflecting the fact that population across much of the northern part of the Borough is generally sparse, rural settlements are both small and quite scattered, and the number of higher-level service centres reflects the relative lack of population hinterland for each.

We broadly **endorse and support** the settlement hierarchy.

However, the approach that simply follows the hierarchy from first principles, fails to account for the fact that:

- Unconstrained development opportunities may not exist within or adjoining these settlements, especially following many planning cycles that have broadly progressed by allocating land within and adjoining these settlements.
- To the extent that they do exist, they may very well not be particularly easy to integrate with the existing settlement, because of land control, topography, physical features, or other severing features – such as railway lines.
- Following from the above, pursuing the principles in PfSH SDS SPS 1, SPS2 and SPS8 many not in fact be best achieved or even achievable at all, by such a strategy on its own, in the south of the Borough. In the north, around Andover, the same basic problems also tend to apply, and continue to make it hard to pursue the wider national policy expectations set in NPPF paragraphs 108-110.

The fact that the hierarchy has been undertaken without any consideration of public transport is a natural cause for concern to us. The reasons for this are set out at 3.27-3.31, and we have already made our own reference to the somewhat precarious position of many rural bus services in our commentary above. However, given the broader nature of the settlement hierarchy and the fact that the availability of very limited public transport neither greatly influenced the hierarchy outcomes, not could be considered to represent a “genuine choice” in the terms set by NPPF to the extent they exist, **we are content** that this does not greatly influence the plan strategy.

We note that as a result of the update of the Settlement Assessment Methodology, the villages of Hurstbourne Tarrant and Ibthorpe, Shipton Bellinger and Wellow that were previously in Tier 2 have been reassessed and are now in Tier 3. **We agree**. These settlements cannot be considered to be equivalent to those remaining in Tier 2 in terms of self-containment and availability of credible travel choices.

However, notwithstanding the current and immediately foreseeable situation, the plan risks the following:

- 1) Allocating development to a substantial number of rural settlements that have no credible alternative to car use, aggravating and already excessively high level of car dependency across the Borough
- 2) Alternatively, failing to assess how far one of more key corridors might become viable for a meaningful public transport offer if development were concentrated on it/them.

Turning to the draft Settlement Hierarchy Table we **strongly agree that Tier 2 settlements are appropriate for strategic allocations.**

Turning to the development that would be considered to be appropriate in the **Tier 3**, we note this is anticipated to be very small scale and community led, or rural exception sites that by definition are small scale and are justifiable to meet immediate local needs. This being the case, **we broadly support this approach.**

Tier 4 settlements are inherently dependent on other localities for even the most basic of daily needs. There is a clear distinction between villages that offer a primary school and convenience retail, presenting a modicum of self-containment, over villages that do not. There is no credible justification for development in Tier 4 settlements apart from the smallest scale of infill, and individual dwellings needed to support locally based businesses, mainly in agriculture. It is perverse to make provision for affordable housing in these settlements when each adult credibly will need to have access to a car at all times to participate meaningfully in society. **We object** to the proposed approach to Tier 4 settlements.

The lack of sufficient opportunities adjoining the largest settlements, set alongside the fact that sustainable opportunities, including **potential new settlement sites, may exist in highly sustainable and unconstrained locations elsewhere**, is not properly recognised in the plan strategy.

The plan thus risks failing to sufficiently robustly test other reasonable alternatives that would produce a strategy that satisfies both the NPPF requirements, including those at Chapter 9; and the principles set out in the PfSH SPS 2023. Notably, the SPS makes no reference at all to settlement hierarchies.

The challenges of serving development with high quality public transport choices is not simply a problem for the rural area. As we have already highlighted, the two largest towns may well struggle to present opportunities for growth that well integrate with existing and potential high quality public transport.

The situation at Whitenap, Romsey, already allocated in the Local Plan, and Ganger Farm, already makes plain the kinds of difficulties that exist integrate new with existing development. Diversion of existing services on a rational route into either site is essentially impossible. It might be possible to extend services such as B*5 or 66 to serve the Whitenap development, but these will only offer direct connectivity to the town centre, rather than other more relevant and attractive destinations, Southampton in particular. At least Ganger Farm is within close enough proximity to Stagecoach 66 to make its use a credible option, though hardly the most attractive one. Bus stop provision to facilitate this is poor.

The limitations of the settlement hierarchy in justifying the draft plan spatial strategy is very evident where the extremities of the Borough lie adjacent to relatively large settlements directly across the Borough boundary.

The obvious example is west of Chandlers Ford, where strategic scale development took place from 1986 onwards on a planned urban extension within the Borough at Valley Park. This is a highly

sustainable location by virtue of services and facilities directly across the boundary, as well as the Bluestar route 5, which is amenable to significant improvement; and, importantly, this is recognised by allocations within the draft plan.

More peculiar is the adjacency of Ludgershall, within Wiltshire, to the Borough boundary. A strategic public transport route (Activ8) crosses the County and Borough boundary here, an opportunity on a corridor we did previously flag up in broad terms at the Reg 18 (1) stage. Again, we note that the draft plan makes two sizeable allocations here; however, the settlement hierarchy and spatial strategy makes no real provision for this and thus these allocations are not robustly justified by the settlement hierarchy – though they can and should be. Ludgershall should be marked on the Key Plan and referred to in the supporting text, as the soundness of these allocations substantially depends on this adjacency.

The opportunities for new settlements on existing or potential bus corridors, including Activ 8 between Andover and Ludgershall in the Weyhill area, or on a potential new direct bus route between Romsey and Nursling via the A3057 Southampton Road, are not picked up by this approach.

12. Meeting Development needs

12.1. *Plan Period*

The plan anticipates a 2040 horizon. This is aligned with a number of other current local plan reviews in Hampshire, including several neighbouring authorities.

However, NPPF paragraph 61 makes plain that plans must look “at least 15 years” beyond the date of adoption. There is no credible route to advance this plan to adoption by 2025, given that it has yet to reach Reg 19 stage and progress through Examination in Public. Indeed, 2026 looks quite optimistic especially given the number of plans now moving forward across England simultaneously having been paused by their respective Councils while awaiting clarity on long trailed planning system reforms, that have in the end proven to be of a much more modest nature than originally trumpeted. The capacity of HM Planning Inspectorate to deal with this surge in demand for examinations over the next three years is something the Council ought prudently to anticipate.

This being the case, to be positively prepared and in conformity with NPPF, the plan should look ahead to at least 2041. Prudently, a horizon of 2042 would be entirely justifiable. This would require the housing requirement to incorporate at least one and better, two years of supply.

12.2. *Housing Requirement*

We note that two evidence base studies have been commissioned and published to inform the amount and distribution of housing in the plan. **We welcome this.**

- The Strategic Housing Market Assessment (SHMA) is a study that is typical and reflects Government guidance.
- The Housing Market Area Study (HMAS) 2022 looks at the structure and broad functioning of the housing market. The significant extent and unusual geographic context of the Borough certainly warrants this extra work.

We agree that there are no particular strategic infrastructure investments or housing growth funding that justifies a higher number than that set by the Standard Methodology. (Para 3.59 refers)

We note the comments regarding unmet need from neighbouring authorities, or elsewhere in the Partnership for South Hampshire (PfSH) at paragraphs 3.60 ff., noting too that the Council considers that the position “is changing”. We have also reviewed the PfSH Strategic Position Statement (SPS) published in December 2023. This considers housing needs in the PfSH area only as far as 2036, not 2040 which is the stated horizon of this Plan.

Two authorities bordering TVBC stand out. One, New Forest District, clearly cannot meet its assessed need to 2036. Southampton City’s formal assessment of what appears to be extraordinarily high levels of supply entirely on previously developed land to meet needs to 2036, setting aside a 35% uplift that has been arbitrarily applied by the Secretary of State, requires some substantial leaps of faith, not least because the deliverability of much identified supply is a matter of some speculation, and a substantial “windfall” contribution is entirely hypothetical.

We **disagree** that the Council should assume that no contribution to meeting the needs of these two authorities is likely to be required.

Looking even at the supply position in Southampton to 2036, further evidence is likely to emerge as to the robustness of the numbers set out in the SPS as the City Plan progresses towards Examination in Public. It is notable that a planned pre-submission consultation intended for Summer 2023 has yet to take place, suggesting that evidence lying behind the numbers in the SPS may not be dependable.

We note that *“The Council is committed to undertaking a future review of the Local Plan 2040 which can address (evidenced unmet need requirements) if needed. We will continue to engage with our neighbouring authorities in the south of the Borough through the Partnership for South Hampshire.”* (paragraph 3.63)

Irrespective we consider it to be premature to progress the plan much further until there is greater clarity as to what housing supply can be relied on within the City of Southampton where its Local Plan Review to 2040 is far advanced, and where it is reasonable to expect this clarity to emerge in the fairly short term at the publication of the pre-submission (Reg 19) version and its evidence base.

However, we do not see any strong or logical reason why a contribution should be made towards Havant’s needs. It is self-evident that housing needs should be met closest to where those needs arise. The SPS demonstrates that other authorities adjoining Havant are more likely to be able to make a contribution in a manner that reflects a much more sustainable pattern of development.

12.3. Housing Market Area apportionment

The HMA Study has sought to assess the evidence behind an approach that treats the north and south of the plan area as relating to discrete HMAs, a long-standing approach in planning for the area. We note that it

“...recommends a continued split with two separate HMAs, but with a revised boundary. The revised boundary takes account of the wider extent of the HMAs on a regional and sub-regional basis. This recommends a boundary split around the route of the A30 (with a best fit approach based upon parish boundaries).” (paragraph 3.67)

We welcome this review and support the conclusion made as an appropriate one.

12.4. Spatial Strategy Policy SS3

Following from the commentary above we considered the draft policy to be flawed in some important respects.

A plan horizon that looks ahead to 15 years beyond a reasonable a date of adoption is likely to require at least another 550 dwellings, and probably 1100, being two years. Rolling the base date forward to 2022 from 2020 would address supply delivered to that point which, again, may also be prudent. This would retain the current nominal need, but require significant adjustment in the identified supply, and the residual quantum to be planned for.

We **agree** with the HMA apportionment.

We consider that **the plan should await publication of the Southampton City Vision Reg 19 pre-submission draft** to establish what if any unmet need from the City of Southampton might exist, and how far it is appropriate to provide for this in Test Valley, following the principles set out in the SPS 2023.

12.5. Rural Housing Requirement

Clearly the rural area has its own particular development needs and it is prudent that these should be appropriately planned for. In doing so it is vital that a spatial strategy is pursued that does not “bake in” extreme car dependency.

While we support the identification of a rural housing need figure in Spatial Strategy Policy SS4, the justification for this numbers set out in paragraph 3.72 seems back to front, and appears to be supply driven rather than objectively driven by specific local needs.

There is a clear need to locate significant development only in places where sustainable modes can provide a “genuine choice”. The additional rural housing quantum is 542 dwellings – a significant number – and there is no clear evidence as to why this need cannot be met in rural settlements that offer a credible public transport choice, or could provide one. Stockbridge, in particular, stands out as a Tier 2 settlement that also offers secondary education as well as variety of retail and other services and employment.

Furthermore there are already 492 dwellings committed for future delivery in the rural area. Assuming the great bulk of these actually come forward, over the plan period well over 1000 dwellings would be built in Tier 3 or 4 settlements, most of which have no credible choice for personal mobility other than car use. This is clearly unsustainable. Patterns of development should be “actively managed” in pursuit of the sustainable transport objectives in NPPF at paragraph 108 for the rural housing element of the plan to be sound. This approach is evidently entirely passive.

There may be potential to look with some urgency at the business case to establish a more regular Andover-Stockbridge-Winchester bus service, that could be justified by development at Stockbridge and/or at other sustainable points on the corridor to meet rural needs much more sustainably.

Where small scale highly localised needs justify rural exceptions sites being brought forward, this could be treated as a case for a very small amount of additional windfall of affordable housing brought forward locally and treated as a modest additional uplift.

12.6. Housing Supply

Notwithstanding our comments on the plan period and the need to await evidence on unmet needs arising within the City of Southampton, we **note and welcome** that the plan intends to meet the Borough’s housing needs in full. This is considered to be 5487 in Test Valley South and 6928 in Test Valley North

We comment on the allocations made to meet the needs set out at Policy SS6, below, separately, having regard to the requirements set out in NPPF Chapter 9 and the specific local objectives of the PfSH SPS, where South Test Valley is concerned, and the plan itself across both the two sections of the plan area.

13. Proposed New Allocations – Test Valley North

13.1. Allocation Policy NA1 Andover Town Centre

Andover Town Centre will accommodate approximately 367 homes.

Maximising the capacity of appropriate residential opportunities in Andover town centre is **supported**. This is one of the most accessible locations in the Borough by sustainable modes, and there is a rich diversity of facilities and services within immediate reach.

Much of the town's employment is found on peripheral industrial parks, and all of these are or could be accessible by bus. It is likely to be necessary to identify gaps in timetabled provision for key shift change times to support sustainable access from the town centre and, indeed, more broadly across the town. A wider strategy to achieve this, supported if necessary, by necessary proportionate revenue support contributions should be agreed with bus operators.

The nature of regeneration and redevelopment means that the capacity and timing of delivery of the identified capacity is likely to be very hard to accurately establish. We urge the Council to ensure that the housing trajectory takes a suitably well-evidenced and prudent view of this.

We must also make plain that **current proposals for parts of the town centre funded under the “Levelling Up Fund” currently prejudice the bus station access and egress** is a very serious manner. While the broad objectives of the vision for the area on the west side of the town centre is supported, plainly it is inappropriate and unsupportable that this should seriously compromise safe and efficient access by bus to the town centre. The bus station was itself only relatively recently enhanced, principally through developer funding from strategic allocations at East Anton and Picket Twenty. We will continue to work in dialogue with the Council to resolve these tensions in a satisfactory way.

13.2. Allocation NA4 Land South of London Road, Picket Twenty, East Andover

This land is considered capable of providing **90 dwellings** to meet the housing needs of the area.

The allocation is **strongly supported**. The site is within relatively immediate reach of the P20 service between Picket Twenty and the town centre running every 30 minutes, accessible from stops on Picket Twenty Way. It is highly pertinent to point out that Stagecoach service 76 to Basingstoke via Whitchurch runs on London Road every hour (with uplift to every 30 minutes committed for later in 2024) immediately to the north. Maximising the convenience of access to both services is important.

The allocation is noted to already be allocated in part in the adopted Local Plan 2016. A current planning application is lodged with the Council for 73 dwellings on part of the draft allocation ref 23/03020/FULLN. The allocation ought properly to reflect this capacity which has been tested in the preparation of the application.

We welcome the requirement that: *“The proposed development will need to integrate with existing pedestrian, cycleways and public transport connections.”* (para 4.52). This ought to make specific reference to pedestrian connections to new/improved bus stops on London Road.

Appropriate sustainable consolidation of Picket Twenty within landscape and other constraints represents a highly sustainable strategy. This among other things, will support the more secure commercial operation of the P20 and 76 services in the area. Accordingly, we note another application for other land on the southern fringe of Picket Twenty: within the boundary of the original allocation 23/03022/FULLN for 103 dwellings. We consider this site highly supportable for the same reasons and question its omission as a draft allocation. It lies within an extant allocation and accords entirely with the existing and draft spatial strategy in this plan.

13.3. Allocation NA5 “Enham Park” Land at Manor Farm, North of Saxon Way

This land is considered capable of providing **800 dwellings** to meet the housing needs of the area.

The draft allocation is acknowledged to closely conform to the spatial strategy of the plan but achieving the Council’s aspirations for a high quality public transport choice may be quite challenging given the scale of the allocation and its location.

We note that the Council aspires to a:

“High quality sustainable development will be required that is integrated with existing pedestrian, cycleways and public transport connections to nearby residential development, facilities and Andover Town Centre. Within the vicinity of the site there are key facilities, such as shops and community facilities, at Saxon Way and Charlton village.” Paragraph 4.62

The Council should be aware that the baseline level of bus service here is much more limited than Picket Twenty. Service 11 operates daytimes broadly every hour on Kiel Drive on a loop that passes the site frontage on Saxon Way. **Should the County Council withdraw the budget for less frequent buses within Andover town as it currently proposes, it would no doubt be at high risk of withdrawal.** Its current timetable has basic relevance only to those who have no car available. However, it cannot achieve mode shift.

The combination of demands between existing development and the proposed allocation might conceivably start to make a more frequent and effective service possible. We note Charlton Neighbourhood Plan Allocation CN1 for around 50 dwellings abuts the southwestern boundary, which would also take advantage of any such service provision. If it can be demonstrated that a significantly higher development capacity can be achieved on this site, then this should be pursued as the viability of public transport here will be quite sensitive to overall scale of development as well as achieving a policy-compliant level of affordable housing. However, we are well aware that site potentially impinges on protected heritage assets (para 4.68 also refers) and that this will no doubt present constraints to the achievable capacity of the site.

Achieving the potential for a reinforced bus service 11 would demand the establishment of a rational, efficient slightly enlarged terminal loop, the western terminal of which would take advantage of the existing western arm of the Kiel Drive roundabout, as marked on Fig 4.5. There is no other vehicular access currently indicated. There is **no way** that a stand-alone cul-de-sac access strategy can provide an effective and rational bus service pattern that would allow the combination of a relatively modestly sized allocation with existing demands to the south. A second eastern access would be necessary with a reasonably direct and efficient primary street between these two points,

connecting to a second all-movements junction on Saxon Way with Kiel Drive – probably a new roundabout replacing the current priority T-junction.

Significant development contributions would be required, from a suitable agreed trigger of occupations, to establish or re-establish a service operating at least every 30 minutes between 0700 and 1900, Monday-Saturday. Optimising the relevance of this service for a wide variety of journey purposes should be discussed with local operators, if mode shift and longer-term commercial viability is to be achieved. Evening and Sunday services are likely to be worthy of detailed discussion.

13.4. Allocation NA6 Land at Bere Hill, South East Andover

This land is considered capable of providing **1400 dwellings** to meet the housing needs of the area.

The draft allocation is acknowledged to closely conform to the spatial strategy of the plan but achieving the Council's aspirations for a high-quality public transport choice may in fact be very challenging given the scale of the allocation and its location. We have material concerns that a credibly effective and viable public transport strategy is not obvious and remains to be demonstrated.

This of course, strongly challenges the assumption and analysis made in the SA, which appear to believe the site is uniquely **well served by bus. This is simply not the case.** Access to relatively infrequent bus services to the north on foot or cycle is seriously challenged by topography and the nature of the urban form to the north, where the proposed allocation itself stands off from the Ladies Walk aggravating the severance and lack of obvious integration between the draft allocation and the proposed development footprint. Again, those existing bus services closest to the site are at risk of withdrawal under the SP25 proposals, which means that the site really needs to assume reliance on the P20, given that it would be inappropriate to divert 76.

We note that the Council considers that:

“The site provides an opportunity to deliver a sustainable strategic allocation of approximately 1400 dwellings that would integrate with southern Andover close to key facilities and infrastructure. High quality sustainable development is required on this site including integration with pedestrian and cycle connections to neighbouring areas, such as Picket Twenty.” (paragraph 4.73)

However, while certainly proximate to the existing southern edge of the town, both the existing built form, heritage assets, topography and habitat and biological constraints bind on the site in such a way that the built footprint will stand off from the edge of the town, which already “turns its back on the site”. The direct link and desire line along Old Micheldever Road to the town centre runs underneath the listed “Ladies’ Bridge”, but is single track over an extensive length. It is unclear if this could be used to form any kind of access restricted to both buses and sustainable modes only. This would be essential if the Council's aspirations that this site improve connectivity between Picket Twenty and the town centre could be achieved (para 4.76) where bus services are concerned.

It is imperative that all due effort is expended to try to secure public transport operation over this link, and its delivery sufficiently early in the site build-out, as it would allow demands between existing and the proposed site to be combined highly effectively, on a single direct and logical route. This could well allow for the substantial enhancement of the existing Picket Twenty bus service. However, this already operates along London Road and simple diversion may not be entirely straightforward without looking at the implications of this for the wider network operating in the area. We therefore note the further comment that:

“Site access is proposed from the A3093 (adjacent to Picket Twenty). Further technical work will be required to assess the feasibility of any possible further access points. Active travel (cycling and walking) links to Andover town centre will need to be provided.” (Paragraph 4.80)

If a public transport link is not achievable on Micheldever Road, then a stand-alone “bespoke” service would be required. With little or no other demand than that arising from the development, the costs of establishing this will be high, and its long-term sustainability even as a single-bus operation every 30 minutes, is not entirely credible should the planned quantum be achievable at a policy-compliant level of affordable housing delivery. However, it would be marginal, and its sustainability open to a certain level of doubt. This concern would increase rapidly if the site capacity reduces below 1400 dwellings and/or if a policy-compliant level of affordable housing is not delivered.

The far western end of the site may well exceed a 400m walk from stops on a rational bus service alignment. Dene Path leads into the existing built-up area. However, great caution should be taken assuming the already limited bus services there will be sustainable long term. Securing a western vehicular access from Old Winton Road from the site is something that apparently has yet to be demonstrated and needs “further technical work”.

We note that the site is in three controls. **Comprehensive master planning allowing for the rational development and phasing of the site will be essential. This is nowhere reflected in draft policy.**

Given how sensitive the access constraints on this site are, and the control across three different landowners, it is especially important that the key principles for the development are agreed across the whole site in advance of planning application/s being submitted.

13.5. Strategic scale development at Ludgershall

The background to two strategic allocations at Ludgershall is set out at paragraph 4.85 in the following terms:

*“These sites provide an opportunity to deliver strategic sustainable allocations at a sustainable location adjacent to Ludgershall. These sites are proposed alongside Wiltshire Council’s proposed site allocation of approximately 1,220 dwellings at Land at Empress Way in their Regulation 19 Local Plan (as draft allocation 40, Land South east of Empress Way). The proposed site allocation in Wiltshire is to the west of the proposed site allocation at Land to the Southeast of Ludgershall. The combination of the three sites would deliver approximately **2,720 dwellings** at Ludgershall.”(our emphasis)*

Viewed strategically, these proposals must be considered contextually and holistically.

First, these sites relate to a settlement in Wiltshire, and are physically very remote from the Boroughs main centres of services and activity. They do not clearly align with the spatial strategy as it is currently framed. Ludgershall does not feature in the plan’s settlement hierarchy. If it did, it would be a “Tier 2” settlement, and this does justify significant development.

However, Ludgershall is not a town in the conventional sense. Its range of facilities is very limited, with correspondingly low self-containment. Employment has been dominated by the presence of the military here and further west at Tidworth, which has a much greater range of services and facilities. Ludgershall does offer secondary education, however. It is pertinent to note Wiltshire Council’s own commentary on Ludgershall, which is considered a “Market Town” only on the basis that it is jointly so categorised with Tidworth, the centre of which lies some 4km west of the settlement core and still

further from the draft allocations at Ludgershall. The majority of employment and facilities in the “Market Town” actually lie in Tidworth. This is reflected in Wiltshire Council’s own narrative set out in the “Planning for Tidworth and Ludgershall” paper (July 2023) supporting the Wiltshire Core Strategy Reg 19 consultation:

“Tidworth and Ludgershall, while separate settlements each with their own unique identity, are grouped together for the purpose of planning policy because the settlements have complementary roles in respect of shared facilities and resources.”

...

“At Ludgershall, a significant employment site is allocated for the development of Castledown Business Park, forming a Principal Employment Area. Castledown is located to the west of the defined ‘town centre’ in Ludgershall, and is as yet largely undeveloped, with development at the site’s eastern end having taken place. The town centre itself is modest, with a focus on day-to-day top-up food shopping and services. Ludgershall benefits from its complementary role with Tidworth, where main food shopping options are more readily available.” (Section 2)

This is an effective recognition that Ludgershall in itself, cannot be considered a significant settlement for services or employment and has minimal self-containment, limited employment, and no wider service delivery function. In itself then, it cannot be described as a “Market Town”.

We understand that the Castledown Business Park has recently been agreed to be sold, which would diversify employment, and the Wellington Academy at the far western end of the settlement does ensure important self-containment for secondary education. Thus, congruent with our representations to the Wiltshire Local Plan Review Reg 19 consultation, **we agree that land adjacent to Ludgershall within Test Valley does offer potential for meeting housing need on an appropriate scale, subject to it also having good access to the principal public transport spine** through the settlement, offsetting its very limited service and employment offer.

In this regard, the settlement is, notably, on the jointly-operated Activ8 bus service between Andover and Tidworth, continuing to Amesbury and Salisbury, as the Council properly recognises. This operates seven day a week on the main A342 and frequencies are very regular. Restoration of additional frequencies operated between Andover and Tidworth only that were dropped during COVID would be vital for public transport to play a significant role in meeting mobility demands. However, it makes little sense to run additional buses if the frequency would be split between two routes – as it would need to be if development south of the railway were to be meaningfully served. Whilst land directly on the Activ8 route to the north of the A4342 can be considered highly appropriate for development, serious questions exist for us about the appropriateness of a joint allocation that is by far the largest in the plan south of the military railway, in a relatively remote location, where relevant public transport choices are unlikely to be easily deliverable nor effective.

Jointly made representations to the Wiltshire Council Reg 19 consultation by Go South Coast and Stagecoach made plain serious concerns about the appropriateness and sustainability of Draft Allocation 40, with an additional concern that this had never been published as a draft option at the reg 18 stages for public or stakeholder scrutiny. These centred around the severance of the site from the existing settlement and the fact that its intended form mitigated strongly against effective public transport being provided. While the proposed allocation in TVBC does at least create some

transparency about the delivery of a parallel primary vehicular route extending Empress Way to the east across the County boundary and to the A342, this is much more likely to facilitate good access by car than to present a rational basis for a bus provision directly to the land.

The scale of the combined allocations, relative to their location in the Borough and the nature of the wider geographic context, is also highly notable. The proposed allocations singly and together, represent the largest made in either plan in the respective Housing Market Area/s, and some of the largest in the whole plan. In spatial terms this represents a real distortion and does not clearly follow from the draft plan spatial strategy and its evidence base.

Indeed, the combined proposals south of the railway at Ludgershall are so severed from the existing modest settlement, and dwarf it in scale, to the point that the Wiltshire and Test Valley proposals in combination could be described as **an entirely new village**, as they will probably support sufficient local services if delivered as currently envisaged, that would be equivalent to or even exceed the existing settlement. Thus there would be **no meaningful functional relationship between the two** except for the purpose of secondary education: the same relationship with Ludgershall as the much larger and discrete settlement of Tidworth has. **However, a new village or settlement was ruled out of the range of appropriate spatial strategies on the basis that the quantum did not require it.** We would suggest that from examination of the plan strategy as proposed and the evidence behind the larger allocation at Ludgershall, the plan circumstantially proves the opposite.

The allocation in Wiltshire itself is in some way tied to the housing needs of the southern (Salisbury- and Amesbury focused) HMA. Given its distance from Salisbury and a wider under-allocation of homes to meet the assessed needs of the Southern HMA, this raises its own concerns. In the case of the justification for the allocations in TVBC, it is relatively unclear whether these sites meet endogenous needs in the Borough, or in practice could or should meet un-met needs arising in Wiltshire.

We see that of the two, draft Allocation NA7 is highly supportable given its location directly on the public transport spine and immediate adjacency to the town.

By contrast, and in line with what we clearly signalled to Wiltshire Council and the Planning Inspectorate with regard to Draft Policy 40 of the Reg 19 Wiltshire Local Plan Review, those elements of development at Allocation NA8 extending far south of the military rail alignment, that lay beyond easy reach of the Activ8 route by sustainable means, cause significant concern, though the elements within 700-800m of the corridor by a safe sustainable access link could also be supportable in part.

We also note that the scale of development jointly proposed could well tax local facilities, including schools (paragraph 4.87 refers). The draft plan is not specific about this, but significant uncertainty must surround the nature of these deficits and how they might most rationally be solved. Certainly, if secondary education needs cannot be fully met at the Wellington Academy, then the viability of providing additional provision either within Hampshire or Wiltshire, without creating difficulties with the scale and effectiveness of new and existing provision will need full and robust assessment. The scale of the proposals does make the provision of at least one new primary school a credible one.

Turning to the Council's own evidence base, we find it perplexing that the choices made in Ludgershall are advanced as draft allocations when they score less well in the Council's own Sustainability Appraisal matrix than some other sites in Test Valley North; that at the same time, are also far better in conformity with the plan's spatial strategy as they are adjacent to the Tier 1 settlement at Andover.

Finkley Down Farm (SHELAA site reference 165), in particular, stands out as performing substantially better in the Transport Objectives section of the Sustainability Appraisal than Land Southeast of Ludgershall.

We comment about the specific allocations below.

13.6. Allocation NA7 Land East of Ludgershall

This land is considered capable of providing **350 dwellings** to meet the housing needs of the area.

The Councils sets the following expectations:

“High quality sustainable development will be required with integration with existing pedestrian, cycleways and public transport connections to Ludgershall centre and Andover. This includes providing connections to access the frequent bus service (the Activ8) which runs between Andover and Salisbury via Tidworth.” (paragraph 4.90)

These aspirations should be relatively straightforward to achieve, at modest costs.

As discussed above, this allocation relates directly to the Activ8 corridor. By virtue of location and scale, it is highly appropriate and sustainable, and it is **strongly supported**.

Residents will be able to take advantage of the service from first occupation subject to suitably upgraded bus stop facilities being provided on London Road. Car should be taken to locate at least one pair of high-quality bus stops, associated with a new pedestrian crossing facility, on Andover Road. This should be accessible by direct legible pedestrian links northwards into the body of the development.

Working with the Councils and the promoters of NA8, we would urge that the opportunity to provide facilities of such a scope and quality to act as a substantial local travel interchange are provided, if that site is to be brought forward. This might be better located south of Andover Road within that allocation, immediately east of any junction and bridge connection. If this does take place, then the pedestrian and cycle access strategy for NA7 should take due account of this facility.

However, we would stress that we do not consider the soundness of NA7 has any bearing on the allocation and delivery of draft allocation NA8.

13.7. Allocation NA8 Land South East of Ludgershall

This land is considered capable of providing **1150 dwellings** to meet the housing needs of the area.

As discussed above, a very significant portion of the proposed site, extending to the south, is poorly located with regard to both the public transport spine on Andover Road, and by virtue of the severance presented by the military railway. This aggravated by its relative distance from the service core at Ludgershall which lies considerably to the west. Finally, the land under control is of a peculiar extent. Only a short frontage is presented to Andover Road, where a highway access will need to be provided. The bulk of the demise stretches south to Shoddesden, a distance of about 1.2km along Shoddesden Lane from the Activ8 on Andover Road/Main Street. A substantial area extends to the east as a “panhandle”, but this sits south of land in third party control and its development would represent a somewhat irrational urban form in the landscape. The ability to secure direct pedestrian access farther east onto Andover Road is equally apparently precluded.

It is obviously inappropriate to divert Activ8 off its current route as that would in effect leave the entire existing settlement north of the rail line unserved.

It is highly arguable that a separate dedicated service running south of the railway would be appropriate, effective or sustainable. Partly this is because the distances involved to key destinations including Andover are relatively great, and the amount of staff and vehicle resource required directly reflects this. Reinforcing the current corridor, to offer a higher frequency service, is much more likely to stimulate revenue on the corridor as a whole. It also will justify residents travelling further to stops, as a higher frequency substantially reduces the generalised journey time.

We therefore have **very considerable concerns** about the sustainability of the allocation as currently proposed.

However, as we made plain in representations to Wiltshire, a development spanning the boundary and restricted to the credibly developable area nearest to the railway and links across it to the Andover Road might be supportable. Quoting the relevant summary paragraph of these representations directly:

“We consider that Policy 40 could seek to allocate a still very substantial development, that extends no further than about 700-800m south of the Andover Road, subject to suitable vehicular pedestrian and cycle access being achieved between the site and A342 Andover Road.”

As we point out above, a sustainable access strategy needs to be primarily focused on Andover Road, maximising pedestrian and cycle connectivity to stops on it. With this in view, it would also be prudent to ensure that at least one pair of stops at the main entrance in Hampshire features enhanced cycle access and the provision of secure cycle parking facilities, a good standard of lighting, and, conceivably, some kind of dedicated facility for short stay waiting for pick up and set down, as part of a comprehensive master plan to support these sites coming forward.

We note that the proposed vehicular access points on Andover Road for both this allocation and NA7 are essentially aligned. This is rational and supported, as it creates the best scope for some kind of focused sustainable modes interchange. We note too, the comments that the land immediately between the railway and the A432 at this point has been in former commercial use and may be contaminated. However this area could well offer important scope for enhanced bus stops, and we urge that the potential for this is looked at in much greater depth.

With these comments in mind, we do not consider that an allocation of the scale proposed is appropriate, and we have serious concerns as to its sustainability the further south it extends. A more compact allocation more closely related to the public transport spine looks likely to have a scale of up to 700 dwellings. This is still of quite substantial scale. When considered alongside the draft allocation and existing committed development immediately to the west within Wiltshire, a combined neighbourhood scale of 1100-1200 dwellings will be achievable, sufficient to justify a local centre and primary school necessary to ensure reasonable local self-containment, which is currently very lacking south of the railway. It ought also to provide sufficient scale to justify the deliverability of the rail bridge, which we recognise presents a significant abnormal cost.

13.8. Allocation Policy NA9 Land South of Thruxton Aerodrome

This allocation extends to 15 Ha. and is considered capable of supporting a “high quality business park of up to about 60,000 sqm (GIA)”.

The principle of the plan providing significant additional further employment land in Northern Test Valley is welcomed and supported. It is clear that demand exists in the area, especially well-related to the A303 corridor as exemplified by the build out of the extensive Andover Business Park at Andover

and additionally, Solstice Park at Amesbury – both large-scale strategic sites. While both lie off the main public transport spines to some extent they are adjoining the largest settlements and thus cycling, for example, presents a reasonably credible choice for some. Off-road segregated cycling facilities have been provided at Andover Business Park. The Activ8 service is also walkable, albeit some walks are somewhat greater than desirable, across busy junctions.

This allocation is rather smaller. It to an extent consolidates an area already in employment use, and is adjacent to the A303, which will no doubt underpin its attractiveness to the market which places a high value on direct access to the SRN.

However, this only provides for employee access by car. There is no public transport provision in this area, and the Thruxton area lies far south of the Activ8 corridor. The scale of development existing and combined, in no way is sufficient to make a public transport offer viable. A single end user B8 distribution facility of the scale indicated, might, dependent on employment density, justify a dedicated shift- change bus link to Andover, but this is highly speculative.

This allocation cannot be considered to support the overarching transport and movement Strategic Objectives of the plan, expressed as follows:

“Transport and Movement – Encourage active and sustainable modes of transport, that are accessible, safe and attractive to use, whilst also seeking to reduce the impact of travel in particular by private car. Ensure new development facilitates improvements to accessibility, safety and connectivity in our transport infrastructure.”

Nor can it conform to the spatial strategy that seeks to locate development adjacent to the Tier 1 settlements in the first instance. It aggravates already high car-dependence for journeys to work. If Thruxton is not considered appropriate for strategic scale housing development, it is not possible to follow why it should be considered sustainable for further employment development on this scale.

The proposed allocation is therefore **not supported**.

14. Proposed New Allocations – Test Valley South

We note and broadly concur with the explanatory text in the plan at paragraphs 4.129 ff. and in particular regarding Romsey at 4.131.

We also would highlight the remaining undelivered allocation in the current Local Plan at Whitenap. This is subject to an undetermined application for 1100 dwellings (22/01213/OUTS) of the 1300 nominal capacity currently assumed in policy, mainly to preserve important landscape characteristics. While adjacent to the town, it is proving to be exceptionally difficult to identify how the site can be served by public transport, since it is now apparent that diversion of existing Bluestar services 4 and 5 are not achievable. Extension of both from the bus station to terminate within the site might be achievable but the scale of development now proposed makes it highly unlikely that the additional vehicle resource would be commercially sustainable and journey times to major destinations outside Romsey on which viability is largely predicated, would be relatively unattractive.

This allocation highlights very well that mere adjacency to the main settlements does not automatically confer advantages where public transport provision is concerned. Similar albeit less acute issues confront new draft allocations in the plan, both at Romsey and at Andover, and at Ludgershall, as we separately explain.

14.1. Allocation Policy SA1 Romsey Town Centre

Maximising the capacity of appropriate residential opportunities in Romsey town centre is **supported**. This is one of the most accessible locations in the Borough by sustainable modes, and there is a rich diversity of facilities and services within immediate reach. However we note that only 30 dwellings are considered to be likely to identify. This is not a strategically-significant quantum.

We note that a Town Centre Master Plan is adopted and that this involves the redevelopment of the bus station. It is important to recognise that the plans for the area aim to ensure that no loss in the capacity or functionality of the bus station, which is very important and welcomed.

14.2. Allocation SA4 “Kings Chase South” - Land South of Ganger Farm, East Romsey

This land is considered capable of providing **340 dwellings** to meet the housing needs of the area.

The plan rightly sets out an expectation that:

*“The site provides an opportunity to deliver a sustainable strategic allocation of approximately 340 dwellings that would integrate with northern Romsey close to key facilities in the neighbouring areas. High quality sustainable development is required on this **site with integration with pedestrian and cycle connections to neighbouring areas, Ganger Farm Sports Pavilion to the north and existing public transport connections**. Further detailed work is required to assess the impact of a pedestrian and cycle access through or around the woodland areas to the south of the site. (paragraph 4.172)” (our emphasis)*

We emphasise the importance of this integration given the context of the site below.

The proposed allocation is already the subject of an application lodged with the Council for 309 dwellings (23/00964/OUTS) being a lesser quantum than the proposed allocation. It is not clear the basis for the Council’s capacity assessment.

We notice that Hampshire’s Highway Development Management function (HDM) has already engaged formally with the applicant and raises no objection, subject to sustainable travel links to Mountbatten School being improved, and links towards Winchester Road, some distance to the north. The HDN responses make no meaningful comment on access to public transport choices.

These would depend on the Stagecoach service 66, certain journeys of which run via Braishfield Road and others via Winchester Road to the west and south of the site respectively. The nearest bus stops lie broadly at the western end of Ganger Farm Lane, which offers an off-carriageway walking and potential cycling route directly to the main access to the site proposed off Scorey’s Crescent, a distance of just over 600m. The Woodley Close stops are helpfully served by all service 66 journeys offering up to 2 buses per hour in each direction. **However, it is not proposed to upgrade this link, which is not lit nor paved. This is a concern**, as it links directly to the stops with the highest service frequency.

To the north service 66 serves “Hillier Arboretum” bus stops on Jermyns Lane, broadly every hour, and this is again about 600m from the sites northern access point. This is a regular but lesser frequency. These stops were upgraded in connection with Ganger Farm phase 1, However they would usefully benefit from lighting as they are entirely unsurveilled on an unlit road.

Access south from the site to Winchester Road will also be provided along with a new pedestrian crossing. There are fewer journeys provided direct via the A3060 Winchester Road/Straight Mile. The

split of the route greatly reduces the effective frequency. A 4m wide pedestrian and cycle facility is proposed. This leads on to Halterworth Lane which provides access towards Mountbatten School, as well as Bluestar service 4 and 5, which are available on Botley Road proving links to both Southampton via Lords Hill and Eastleigh via Chandlers Ford. These stops are well over 2.4km from the centre of the site and involve using a lane with rather narrow and inconsistent pedestrian facilities, and a level crossing. It is true to say that better off-road links for active travel exist, but they are somewhat tortuous and far from legible, and would need intimate local knowledge.

The foregoing highlights the difficulties of integrating urban extensions into the existing built fabric and into existing public transport corridors in particular.

Broadly, the proposed allocation is **supportable in principle** subject to significant augmentation of bus services and facilities.

Further discussion is needed with operators. It is correct that extension or diversion of bus services into the site would not be appropriate, as there is only a single point of vehicular access. Funding is likely to be necessary to ensure that at least a half-hourly service is available consistently at both Woodley Close and at Jermyns Lane/Hilliers Arboretum. This reflects the fact that most residents would be well over 800m from these stops, greatly more than is desirable for public transport to offer a realistic option even to those without a car.

Further upgrade of the Hiller Arboretum stops with lighting and substantial upgrade of Ganger Farm Lane is in our view necessary if this site is not in practice to be exceptionally car-dependent, notwithstanding its adjacency to the existing built-up area.

14.3. Allocation SA5 Land South of the Bypass, South Romsey

This land is considered capable of providing **110 dwellings** to meet the housing needs of the area.

This land is highly sustainable, being within immediate reach of town centre and other facilities. The bus station is about 600m walk. This involves crossing the bypass road. Services here offer regular links to a range of destinations within and beyond Romsey. It is to be expected that measures taken across Romsey and wider Test Valley South to support the wider plan strategy will augment frequencies and hour of operation of these services.

The allocation is therefore **supported**.

It is possible that a new direct service towards Southampton might in time be provided to the east of the site on the A27. Links to new stops on the A27 should be assumed as part of any proposals for the site.

14.4. Allocation SA6 Land at Velmore Farm, Valley Park

This land is considered capable of providing **1070 dwellings** to meet the housing needs of the area.

It is of a scale that is likely to make a local centre viable, and a 1.5 FE primary school is also anticipated. This will offer a substantial level of on-site self-containment.

We note that:

“There are two landowners on this site and a comprehensive masterplan will need to be prepared by the (two) site promoters. The built development will be predominantly focussed to the middle, north and northeast of the site.” (paragraph 4.190)

We **strongly agree** that a comprehensive development strategy covering the entire area is necessary not least to maximise the use of walking, cycling and public transport through a comprehensive optimised access and movement strategy.

Accordingly, we **note and endorse** the thrust of paragraph 4.191 which sets out a clear expectation that:

“Development will be required to integrate with existing pedestrian, cycleways and public transport connections including existing public rights of way to Valley Park, Romsey and Eastleigh. This includes providing safe connections to access the frequent bus service (Bluestar No. 5) which runs between Romsey and Eastleigh. Site access is proposed from Templars Way. Pedestrian and cycle access via the south east corner to Bournemouth Road will be explored.”

The site benefits from being adjacent to Bluestar service 5, which is the only regular bus route west of Chandlers Ford. It links the site directly to North Baddesley and Romsey to the west and Chandlers Ford and Eastleigh to the east. We agree this presents significant opportunities for the site, but at least as important to secure better bus service for a much wider range of substantial communities on the line of the route. Both sides of the Borough Boundary immediately to the east, bus service provision is exceptionally limited for the edge of a major urban area, reflecting the particularly unhelpful urban form, type and density of residential development at Knightswood/Valley Park delivered between 1985 and 1993.

We would challenge the assertion in the draft plan that Bluestar service 5 is “frequent”. At an hourly core frequency, the service can be considered “regular”. It is commercially operated but currently marginal. However, development on this scale, combined with growth committed on the line of route at North Baddesley, and conceivably at Whitenap, is likely to present the opportunity for substantial enhancements necessary for the “genuine choice” expected by NPPF paragraph 108 to be provided, and secure the Strategic objectives for transport and mobility that are set out in the draft plan.

There is very limited service at peak times and no evening or Sunday service. There is an early morning tidal offer towards Romsey from Eastleigh, and a converse late evening offer that reflects that buses operate in service from Bluestar’s Barton Park depot to Romsey. The utility of the journeys is consequentially low. Substantial investment in revenue support should be sought to “pump prime” a boost in the frequency and hours of operation as follows:

- Monday-Saturday core frequency of at least every 30 minutes 0600-1900
- Evening frequency of every hour 1900-2300
- Sunday frequency of no less than every hour 0800-1800

There will be a need to establish new and improved bus stops on Templars Way and on Castle Way, including high quality pedestrian crossing facilities. This would also serve existing development better to the north.

A strategy to secure substantial mode shift is necessary. Castle Lane and Templars Way see serious peak hour congestion. Junction capacity at either end so of the link is clearly inadequate. This will need to be addressed. There may be a strategic case to enhance bus frequencies further than those suggested above, and further work needs to be done to explore this, urgently, prior to Reg 19 stage.

Much of the traffic on the link is no doubt associated with the Hampshire Corporate Park immediately to the east. Providing new homes adjacent to this and in close proximity to wider

strategic employment within Eastleigh Borough should be considered a merit of the site and maximising pedestrian and cycle connectivity will therefore be of the essence. Likewise, good cycle links to the University of Southampton Science Park at Chilworth to the south ought to be vigorously pursued. This is less than 1000m from the southern edge of the land.

Subject to the above opportunities and constraints being addressed, the site presents one of very few good sustainable development opportunities in the south of the Borough immediately adjoining a potential high quality bus corridor and the proposed allocation is accordingly **supported**.

14.5. Allocation SA8 Land at Upton Lane, Nursling

This land is well located adjacent to the motorway network and the urban areas of Southampton and Eastleigh. The site has the potential to deliver approximately 8.5ha and about 30,000 sqm GEA of employment focused on storage and distribution uses for which there is substantial demand and market pressure.

It is also considered capable of providing **about 80 dwellings** to meet the housing needs of the area.

The site is **currently remote from public transport**, being about 800m north at its nearest point from Bluestar 4 at The Balmoral, Nursling (the Premier Inn) and will not deliver on a scale that will catalyse sufficient demand to sustain a meaningful service as proposed.

The land forms part of a much larger promotion extending north of the M271 and west of the Romsey Road at Lee/Grove Farm, that involves a new settlement potentially offering a substantially greater amount of employment land as well as up to 2000 dwellings. We note and regret that this has been ruled out in principle as “not needed”, and for no other clear reasons.

We separately make representations that the plan ought to wait until the establishment of housing needs in the adjacent authorities of Southampton City and New Forest District area clearer.

Notwithstanding this, this site and the wider promotion lie alongside a major gap in the public transport offer between Shirley and Romsey, also passing the allocated sites south of Romsey at Whitenap. This being the case, **there is unquestionably a major strategic opportunity, alongside a much more strategic development, to provide a direct frequent bus service to South Romsey from the northern edge of Southampton. This opportunity should be factored carefully into the Councils thinking as they consider how to prepare a Regulation 19 plan, and/or any review that needs to have regard to accommodating needs arising in SCC/NFDC.**

The principle of development of this site is **strongly supported with a view to it forming a part of larger strategic allocation in the relatively near term. If this site is considered sustainable now, and justifies allocation in this plan, then certainly this points to the appropriateness of looking at the Grove Farm site to meet further housing and employment needs.** The latter needs are already acknowledged as being under-provided for in the explanatory text at paragraph 4.211

“We are proposing to meet the need for warehousing and logistics as far as practicable but there remains a shortfall in Class B8 warehousing use. It is a challenge to meet this need, given the availability of sites, particularly for large scale Class B8...”

14.6. Allocation SA9 Land Adjacent to Abbey Park Industrial Estate, Romsey

This provides for a strategic employment allocation of approximately 5.86 hectares at Land Adjacent to Abbey Park Industrial Estate, Romsey.

This consolidates an established employment area within immediate reach of Bluestar 4 and Bluestar 5, providing direct links into Romsey, but also a wide range of other communities within a competitive bus journey time. The allocation is **strongly supported**.

Bluestar 5 to North Baddesley, Valley Park and Eastleigh, lacks sufficient frequencies and peak hour journeys and it must be assumed that this will see develop-funded uplift. Proportionate contributions towards this might well be justifiable from this allocation according to Policy TR1 and Appendix 3 "general requirements for strategic developments".

14.7. *Allocation SA10 Land South of Botley Road, Romsey*

This provides for a further employment allocation of approximately 1.2 Ha hectares is proposed at Land South of Botley Road, Romsey.

Like NA9, this consolidates an established employment area within immediate reach of Bluestar 4 and Bluestar 5, providing direct links into Romsey, but also a wide range of other communities within a competitive bus journey time. The allocation is **strongly supported**.

Bluestar 5 to North Baddesley, Valley Park and Eastleigh, lacks sufficient frequencies and peak hour journeys and it must be assumed that this will see develop-funded uplift. Proportionate contributions towards this might well be justifiable from this allocation according to Policy TR1 and Appendix 3 "general requirements for strategic developments".

The site lies between the bus routes and the wide employment area including NA9. Thus, optimising sustainable accessibility to the entire enlarged employment area depends on improved bus stops and pedestrian crossing facilities on Botley Road. The wider comprehensive master-plan for the enlarged employment area must secure direct, seamless and legible pedestrian and cycle connectivity across the site from Botley Road to the southern boundary with NA9 in particular, pursuant to policy TR1 and Appendix 3 requirements.

14.8. *Allocation SA11 : Land East of Test Valley Business Park, North Baddesley*

This proposes an employment allocation of approximately 2.2 hectares that is a consolidation of an existing employment site, mainly occupied by the new headquarters of Draper Tools.

The site stands some distance offset from the built-up area, and even further from bus services. The nearest stop served by regular buses, on Bluestar 5, are at the Infants School to the southeast about 1100m away; and at The Avenue shops a little further to the south, which is served by both Bluestar 4 and Bluestar 5. This makes bus use very unattractive, and the site is likely to be much more highly car-dependent as a result, than allocations SA9 and SA10.

We presume that the allocation reflects a specific requirement for an established local business.

A more direct lit and paved pedestrian and cycling route east to Nutburn Road would significantly improve the situation, and should be pursued if possible. However, it is far from clear if this is within the promoter's control to allow its delivery. **If not, we would question the sustainability of this site, in the light of national policy and the Vision and Objectives of the draft plan.** However it is of non-strategic scale and there may be case for retaining it on other grounds.

14.9. *Allocation SA12 - Kennels Farm, University of Southampton Science Park, Chilworth*

This proposes a westerly extension of the long-established science park as a strategic employment allocation of approximately 3.9 hectares. This is part of the University of Southampton.

The wider site now benefits from an extension of the Unilink operation provided by Go South Coast under contract to the University. This is a network of public buses connecting key University facilities to one another and to the wider public transport network. U8 serves the Science Park at a stop at Enterprise Road every hour Monday-Friday from about 0645 to about 1900. It links the site to the public transport interchange at the University, where a number of frequent services are available; as well as to Southampton Parkway Station and Airport. Thus, a reasonably credible choice would exist for the proposed extension, subject to an efficient bus route extension and proper turning circle being provided closer to the site. Partnership working to boost the frequency of the U8 would naturally significantly augment the relevance and effectiveness of the service.

The western extent of the site comes very close to Rownhams Road, served every 30 minutes by Bluestar 4. This is actually much more closely related to the site than the current U8 terminus. Provision of safe pedestrian and cycle facilities to effect this connectivity, to a pair of safe lit bus stops, would be highly advantageous. **This would be deliverable in conjunction with separate proposals for the Forest Park set out in draft allocation SA16.** The explanatory text of that policy indicates that public access to Home Wood has already been agreed with the landowners. It ought to be stressed that such connectivity and these kinds of facilities would directly support wider public access to the Forest Park by public transport. **The allocations should cross reference to this and ensure that this forms part of the strategy for delivery of the proposed allocations.**

The allocation is **supported**.

15. Thematic Policies, and sustainable transport to support new development.

We note with great concern the statements made at paragraph 5.490 that:

“Good accessibility and access to a high quality and efficient public transport network is essential to support new development and ensure that it is sustainable, enabling the community to access key services and facilities easily and without always needing a car. This includes improvements to and access to buses routes, bus stops and train stations. Where new developments that increase the demand for public transport, consideration will be given to potential improvements to services and infrastructure, although financial contributions towards supporting bus services will not be supported.”

Following from the wider and more detailed site-specific commentary set out in the representations above, the key issue that the plan ought to recognise is that **while the strategy rightly builds on the principle that localities and sites that will accommodate significant development need to be directly related to existing bus service corridors as much as possible, most of the Borough including many of the proposed allocations, have no demonstrable access to high-quality public transport.**

Indeed the existing network needs substantial reinforcement in most places. In a few locations, extension of the existing network would be required.

The text makes reference to Hampshire County Council’s LTP4. This policy is much more ambitious in securing a shift to sustainable modes than it has been in the past, and the Plan needs to take clearer and much stronger lead from it. The District is far off having a “carbon-neutral, resilient and inclusive transport system designed around people” (as opposed to cars). Consistent, focused and robust action will need to be progressed by all stakeholders, including developers and transport operators such as ourselves, to make this a reality.

While many proposed strategic allocations are quite well-related to secure commercial bus services, even these will require significant uplifts in frequency and hours of operation. Other substantial sites will need what amounts to entirely new services.

The cost of running new or improved bus services over many years at a huge loss, in the hope of at best, a very modest financial return thereafter, is simply not something that is reasonable to expect bus operators to assume. Thus, the principle of develop funding to pump-prime such improvements, if they are necessary, is well established in Hampshire and far beyond.

That many such services have failed to outlast the support period is always a product of the fact the development strategy was inappropriate, and more particularly that

- the service specified by the authorities was never likely to be relevant in terms of frequency or destinations (generally a direct product of the retrofit of bus service measures to unsustainably located allocations to begin with),
- development delivery, including phasing, meant that either buses were unable to serve the site until long after car-based behaviours were entrenched
- demand evolved far too slowly, or was insufficient at build-out due to development scale being too small and there was no ability to synergise with existing established demands
- urban design makes it physically impossible to serve the development as policy anticipated, or so slow and reliable as to make provision unattractive to residents as it is uneconomic to sustain.

We thus understand why there is a reluctance to direct development funding towards bus service improvements. However these representations have already made it clear that without such improvements, there will be no meaningful choice of modes at all, contrary to NPPF paragraph 108-109 and the Objectives of the plan itself. In several cases, on the basis of current understanding, several major allocations will have no public transport at all.

Ironically, in Test Valley, where s106 contributions for bus services been made in support of previous local plan allocations, these have in fact generally led to commercial services becoming established. Both East Anton and Picket Twenty are exemplars of this, despite unusually severe challenges thrown up during the delivery of these sites. Even today, Picket Twenty has no permanent bus stop infrastructure, years after completion. East Anton was largely complete before the adoptions process caught up with the practical realities of securing a bus gate at the local centre – a process that took over 8 years and severely hindered delivery of an attractive service for most of the build out period on the eastern side of the development.

As our representations make clear, especially with regard to Ludgershall, we have no interest in developer funded service packages that simply distort the most effective delivery of the network, and pragmatic view is taken, that we suggest should depend on a relaxed maximum walking distance from the existing high-quality Activ8 service.

Elsewhere in Hampshire we have had to be quite clear that where sites have been allocated without supportable public transport measures being agreed at the outset with operators, there is no point pursuing bus services enhancements at great developer expense that can have no relevance, especially where excellent access by cycle to all key local facilities is demonstrable – including major public transport interchanges. **It is for this reason that engagement with transport operators during plan preparation is so important.**

Thus policy needs to make specific reference to improved bus services, not only improved bus stop infrastructure. This will need to be further reflected in the Infrastructure Delivery Plan, site specific policies and Appendix 3.

The language in paragraph 4.290 needs to be altered substantially.

If it is not, both operators will vigorously object to any draft strategic allocation that has no credible public transport choice to it as being fundamentally unsound. Such an eventuality would be entirely out of conformity with NPPF and wider national policy, Hampshire's LTP4 approach, and the plan's own Vision and Objectives.

15.1. Policy DES1: Delivery of Sustainable and High-Quality Design

Urban design that has little or no regard to facilitating safe and efficient bus penetration and operation through it is now a nationally recognised problem⁶. Despite decades of bad practice having emerged, there is still a worrying obliviousness to this in the development sector. Sadly the lack of any mention of public transport accessibility in the draft policy DES1 is typical, and if perpetuated will no doubt lead to further failures to make suitable provision for public transport.

The policy should be amended as follows:

" G.

*The layout of new developments will be permeable and legible allowing for suitable access and movement for all users **modes pursuant to a hierarchy that effectively.** ~~Development will be designed to prioritise sustainable and~~ **active travel and public transport, and supports their maximum possible use.** Where cycle and car parking infrastructure, utilities and services are required, they will be provided in appropriate and convenient locations for the users and designed to integrate positively;*

15.2. Draft Policy TR1: Active and Sustainable Travel

The draft policy is vague and entirely ineffective where "public transport" is concerned. It makes no reference to the quality of services on offer, or what level of connectivity is required. For example, we too often see proposal that provide a lengthy and poor-quality walking link to a pair of bus stops served perhaps only a few times a week, or by school services only. This kind of tokenistic response would be entirely acceptable with the policy as currently drafted. It does not provide anything remotely approaching a "genuine choice of modes" as expected by NPPF paragraph 108.

The policy needs amendment as follows:

*"c) Access can be made safe, accessible, attractive and functional in connecting and integrating with the highway network and linking to **sufficiently frequent** public transport, services and facilities, including pathways, cycleways and the Public Rights of Way network;*

*d) Where appropriate, financial contributions are secured towards infrastructure **and services to be provided on- or off-site that has been identified to secure a genuine choice of transport modes and meet the objectives of the transport mitigations strategy identified for the plan and for each specific allocation. This can include measures** identified through*

⁶ See for example, the work of the campaign group "Transport for New Homes", which is now increasingly being cited by development professionals, as well as revised guidance imminently to be published by Stagecoach and Go-Ahead Group.

*Local Cycling and Walking Infrastructure Plans (LCWIPs) the **Hampshire Bus Service Improvement Plan**; and...”*

15.3. Appendix 3 - General Requirements for Strategic Site Allocations

We note and welcome that:

“Developments will be required to contribute towards the vision set out in Local Transport Plan 4 (LTP4) for a carbon neutral, resilient and inclusive transport system designed around people.”

In line with the commentary above, the language in Appendix 3 needs to be amended to be effective in securing necessary bus service improvements, whether by extension or frequency uplift, or both. These improvements should be agreed to benefit from a business case that they would become commercially sustainable at the end of an agreed revenue support period. This is entirely congruent with existing Hampshire County Council practice.

The language should therefore be altered to read:

*“Improvements to transport infrastructure **and services** will be required in accordance with Policy TR1-3. This may include the requirement for contributions for improvements to highway infrastructure, including active travel infrastructure or junction improvements, and ~~potentially~~ improvements to public transport infrastructure **and services**. This may take the form of a financial contribution.”*

16. Concluding Comments

Bluestar and Stagecoach welcome the opportunity to shape the plan at this most important stage.

The comments above are aimed at offering a suitably broad, succinct yet appropriately specific response to a very substantial consultation document and supporting evidence suite, running to many hundreds of pages. We hope that the Council, the County Council and the site promoters can make good use of the input we have offered as the plan progresses towards the Regulation 9 pre-submission stage.

We would strongly urge the Council and other plan stakeholders to work with us in the months to come to collaboratively address the issues and the clear opportunities we highlight. This is expected by national policy at NPPF paragraphs 15 and 16, but irrespective, we hope would be recognised to be both prudent and good practice notwithstanding.

In this regard we look forward to further contact from the Policy Planning Team in due course.

Yours sincerely

For Go South Coast/Bluestar

For Stagecoach South



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