

**Test Valley Borough Council
Consultation for Local Plan 2040
Regulation 18 Stage 2**

COMMENTS FORM

Test Valley Borough Council has published its Local Plan 2040 Regulation 18 Stage 2 document for public consultation. This consultation document sets out a vision for Test Valley up to 2040, objectives for achieving this vision, our development needs alongside allocations for residential and employment development and theme-based policies.

The consultation period runs from Tuesday 6th February to noon on Tuesday 2nd April 2024. Please respond before the close of the consultation period so that your comments may be taken into account.

You can respond to our consultation by filling out the form below. This form has two parts:

Part A: Your Details

Part B: Your Comments (please fill in a separate sheet for each comment you wish to make)

Further information can be found on our website at:

www.testvalley.gov.uk/localplan2040

Once the form has been completed, please send to planningpolicy@testvalley.gov.uk below by noon on Tuesday 2nd April 2024.

Following receipt of your comments from, we will keep you informed of future consultation stages unless you advise us that you want to opt out of such communication.

If you are unable to send via email, please send a postal copy to our address below.

Contacting us

**Planning Policy and Economic Development Service
Test Valley Borough Council
Beech Hurst
Weyhill Road
Andover
SP10 3AJ**

Tel: 01264 368000

Website: www.testvalley.gov.uk/localplan2040

Email: planningpolicy@testvalley.gov.uk

Part A: Your Details

Please fill in all boxes marked with an *

Title* Mr/Mrs/Miss/Ms/Dr/Other (please state)	Mrs	First Name*	Sue
Surname*	Mullane		
Organisation* (If responding on behalf of an organisation)	Secretary to Romsey & District Society Planning Committee		

Please provide your email address below:

Email Address*	
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Alternatively, if you don't have an email address please provide your postal address.

Address*		
	Postcode	

If you are an agent or responding on behalf of another party, please give the name/ company/ organisation you are representing:

Romsey & District Society Planning Committee. (Please note that the Natural Environment Committee of the Society will respond separately).
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Personal Details and General Data Protection Regulation

Please note that representations cannot be treated as confidential. If you are responding as an individual, rather than as an organisation, we will not publish your contact details (email/ postal address and telephone number) or signatures online, however the original representations will be available for public viewing at our offices by prior appointment.

All representations and related documents will be held by the Council until the Local Plan 2040 is adopted and the Judicial Review period has closed and will then be securely destroyed.

The Council respects your privacy and is committed to protecting your personal data. Further details on the General Data Protection Regulation and Privacy Notices are available on our website here:
<http://www.testvalley.gov.uk/aboutyourcouncil/accesstoinformation/gdpr>

Part B: Your Comments

Please use the boxes below to state your comments. This includes one box for general comments and another for specific comments related to an area of the Local Plan.

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


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

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

General

Overall there are seven issues which need careful addressing in the Plan text.

- a) Land allocation. There is no explanation of changes in selected countryside to housing or employment land. There is no doubt change is a requirement but the Plan should justify the area choice. For instance new housing south of the bypass will set a precedent such that the bypass road will no longer provide the “hard edge” between countryside and town so treasured by Romsey residents. The need to justify applies equally to the land expansion of Abbey Park industrial site.
- b) Investment in the Romsey hinterland. The draft Plan appears to reduce housing land within hinterland villages. There is little provision for village young families or downsizing elderly people. If this is policy the evidence base should be exposed.
- c) Sustainability. There is much reference to this subject in the Plan however the definition of sustainability needs to be made clear. What Test Valley people want is a transport infrastructure which provides convenient travel to work and to shop. However TVBC does not control bus provision. The Local Plan should make clear just what can be provided from Borough resources and how much subsidy can be made available.
- d) Quality of design. Aspiring to high quality for town infrastructure is a very worthy cause. Assessment of quality will require a clear structure for expertise together with valid authority if this aim is to be achieved.
- e) SoRTC green space. It is understood the Citizens’ Assembly identified the need for more green space in the centre of town. There is no evidence that this has been recognised.
- f) Crosfield Hall. There is inconsistency between the draft Local Plan and the SoRTC Masterplan. In the Masterplan it states that ‘evaluation of the Crosfield Hall site is uncertain’, whereas the Local Plan states that the Masterplan ‘is being delivered proactively’ with no mention of uncertainty.
- g) Ganger Farm phase 2. Sole access is on to Jermyns Lane and currently caters for all the new housing and sports field activity in the area. The addition of a further 300 plus dwellings will overload the existing road infrastructure. A workable alternative would be to provide road access from Winchester Road which would also contribute to the site sustainability.
- h) Infrastructure. Romsey Future Infrastructure Workstream has reviewed provision and made 86 recommendations. Romsey Future Management Board is taking forward 31.

A large, empty rectangular box with a thin black border, intended for users to provide specific comments or suggestions.

For specific comments, please make it clear which paragraph, policy or matter your comments relate to where possible. Please use the box below.

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

Paragraph Ref	Specific Comments
Para 3.43	<p>POLICY SS1 Reference to Settlement Boundaries, para 3.43 the boundaries for Tier 4 settlements should be retained in order that a future opportunity for new dwellings can be considered in accordance with policy. Those villages may prefer to have options.</p>
Para 4.225	<p>POLICY SS5 – The total of 70 houses, as a minimum requirement in Neighbourhood Plans, is in addition to the 282 houses in rural villages? So why is the 282 figure having to be exceeded to 382?</p> <p>POLICY SS6 – Why are Existing Completions included in table 3.3.? Is this double counting?</p> <p>POLICY SS8 – Justification for diminishing the Local Gap by the allocation of an Employment site at Land adjacent to Abbey Park Romsey? Para 4.225 on page 112 hardly gives any justification other than the gap will be reduced!</p> <p>POLICY SS9 – Can the Council not describe what is meant by implementing appropriate action?</p>
Para 4.137	<p>Page 90, para. 4.137 – Why is a residential allocation for 80 dwellings on land at Upton not included in this paragraph? But its marked, albeit in a different colour from other allocations, on the map in fig 4.12 ?</p> <p>POLICY SA1 – No detailed plans have been publicised to be able to state in the Local Plan that 30 dwellings will be provided. Retail evidence has not yet been available either – this is apparently yet to be done.</p>
Para 4.148	<p>Surely a feasibility study is taking place on all of the South of Romsey Town Centre, not just the Bus Station site, in order to analyse the whole site? (Para. 4.148)</p> <p>POLICY SA4 – South of Ganger Farm site - somewhat prejudiced as an allocation by the current planning application.</p> <p>POLICY SA5 – Land south of Romsey Bypass - 110 dwellings proposed and yet access, noise levels, linkages to the town, heritage impact etc studies to be done, so how can the figure of 110 be calculated, suggested or feasible? In addition, this site is by definition south of the BYPASS, contrary to the whole structure of the settlement of Romsey in this particular location.</p> <p>POLICY SA11 – Landscape belt required on the north boundary of the site to prevent any visual intrusion and cause any impact on Emer Bog and Baddesley Common area.</p> <p>POLICIES SA13 -Science Park, SA14-Land at Adanac Park, SA15-Nursling and SA16-Forest Park - no plans included in text of the Local Plan.</p>
Para 4.270	<p>POLICY SA17 – The policy should include the need to retain the existing provision of shops on the ground floor of High Street properties, as mentioned in para. 4.270.</p>

	<p>POLICY CL1 - The policy is vague and imprecise. No measurements are set out but wording is vague with examples ofminimised, maximise, adaptable to changing needs, appropriate, circular economy.</p> <p>Meaning of 'prioritising fabric first'?</p> <p>What body will judge the applications for the carbon compliance details and over what timescale?</p> <p>POLICY CL5 - ...giving 'consideration to'. Lacks of any strength to secure the acceptable setting etc of such projects.</p>
Para 2 3(i)	POLICY ENV2 - 'Appropriate marketing' in para 2 3 (i) should be specified.
Para 2b	POLICY ENV3 - Para 2b) should read more positively by requiring that the retention of important landscape features <u>shall not</u> be prejudiced.
Para 2b	<p>POLICY HE1 - Re para. 2b), The 'early stage of the development' should be more specific. The policy should include that a timescale should be agreed before development is commenced.</p> <p>POLICY DES4 - The policy should include the submission of the public art details and by when they need to be submitted, as well as when its installation shall be completed.</p> <p>POLICY HOU1 - The opening wording of this policy should read as others: Development will be permitted whereetc. The criteria of the size of the sites in hectares should exclude the land taken for roads, drives and access as in the SPD on Affordable Housing. The policy and the SPD should read the same. The requirement of appropriate integration of affordable housing and market housing should include some specific mix such as no more than 'x' number of affordable houses shall be adjacent or opposite each other.</p>
Para 2b	POLICY HOU2 - Re – Para 2b) Why would community led development be required to add more than a S.106 agreement or CIL to support the viability of existing services or facilities?
Para 2b	POLICY HOU3 -Re para. 2 b), is this restriction consistent with the terms of the relevant S.106 agreement for the affordable housing provision?
Para 2b	<p>POLICY HOU5 - Re para 2 b) – this should include that the development reflects and enhances the character and appearance of the local area.</p> <p>POLICY HOU6 - Why would the Council '<u>negotiate</u> on major residential sites ...', these size standards should be required as it is with the requirement for 'All new residential homes'.</p> <p>POLICY HOU8 - Interesting 3rd bullet point – 'Regularisation of unauthorised plots.' This would encourage, present or in the future, unauthorised changes of use of land to gypsy, traveller or travelling showpeoples' occupancy subsequent application should be approved in accordance with the policy.</p>
Para 1a	POLICY HOU10 - Re para 1 a) and its subsections 2 and 4, 'dwelling' should be replaced by 'temporary accommodation' as in sub section 1.i).

Para 2e	<p>Para 2.e) This should require to be relevant to 'temporary accommodation' as well as a dwelling.</p> <p>POLICY TR2 - The wording requires 3.c) to be done irrespective of the Transport Assessment in 1.a) ?</p>
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What happens next?

All valid responses received within the consultation period will be acknowledged and you will be given a reference number. Please quote this reference number when contacting the Council about the Local Plan 2040. If you have an agent acting on your behalf, correspondence will be sent directly to your agent.

All responses received will be taken into account as part of the preparation of the Local Plan 2040.