

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)	Mr	First Name*	Steve
Surname*	Lees		
Organisation* (If responding on behalf of an organisation)	steveleesplanning		

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:

Awbury Holdings Ltd

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

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
SS1	Sustainability Appraisal and Site selection Process Objection
	See separate e-mail for detailed comments
	Support
SS6	See separate e-mail for detailed comments
	Objection
	See separate e-mail for detailed comments
ENV4	Objection
	See separate e-mail for detailed comments

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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.

TVBC LOCAL PLAN REGULATION 18 PART 2 SUBMISSION ON BEHALF
OF AWBURY HOLDINGS LTD

ROUNABOUTS COPSE,
BOTLEY ROAD,
NORTH BADDESLEY

SUSTAINABILITY APPRAISAL
POLICY SS1 SETTLEMENT HIERARCHY
POLICY SS6 MEETING THE HOUSING REQUIREMENT
POLICY ENV4 LOCAL GAPS

March 2024

Summary

Sustainability Appraisal and Site Selection Process

- Objection. The Sustainability Appraisal of land at Roundabouts Copse has not been based on all the relevant information available to TVBC.
- Objection. The Sustainability Appraisal has assessed the impact of development on all of the land at Roundabouts Copse. The SHELAA submission identified an area of approximately 1.8Ha for development out of a total site area of approximately 5.6Ha. There is the opportunity to provide an enhanced and permanent green buffer to define the Local Gap in perpetuity. Further potential for a small nature reserve within the ancient woodland with public access and walking routes, as well as safeguarding the SINC habitat and TPOs whilst protecting the many special characteristics. This land would be positively managed as an area of ecological importance, please read in conjunction with masterplan 24-022-SK02C and location plan submitted.
- Objection. The Sustainability Appraisal for Roundabouts Copse should be revisited and updated with the information submitted with this submission and its performance against the criteria re-assessed.
- The selection of sites for allocations in the local plan is unclear and lacks justification.

Spatial Strategy

- Policy SS1 Settlement Hierarchy. Support. The proposed settlement hierarchy is the cornerstone of TVBC's approach to delivering its spatial strategy and sustainable development. North Baddesley is placed in Tier 2 where the scale of development acceptable in principle includes strategic housing allocations.

Housing Distribution

- Policy SS6 Meeting the Housing Requirement. Objection. The delivery of the housing requirement relies upon a small number of large sites which is not consistent with the advice in the NPPF (2023) paragraph 70 in terms of providing a range and choice of sites.
- Policy SS6 Meeting the Housing Requirement. Objection. The Plan should be amended to include land at Roundabouts Copse, North Baddesley, for housing. See masterplan 24-022-SK02C and location plan attached.

Local Gaps

- Policy ENV4 Local Gaps Objection. The inclusion of all of Roundabouts Copse in the North Baddesley-Chilworth Local Gap is not justified. The boundary should be redrawn to exclude the area proposed for housing. See attached masterplan 24-022-SK02C and location plan attached.

Introduction

1.This submission is made on behalf of Awbury Holdings Ltd who own the land at Roundabouts Copse, North Baddesley. It sets out its response to the Regulation 18 Part 2 Consultation on the Test Valley Local Plan published on the 6th February 2024. Please read in conjunction with masterplan 24-022-SK02C and location plan also attached.

Background

2.The site has a planning history in respect of applications seeking permission for residential development, most recently in 2015 ref 15/00800/OUT, and submissions to TVBC for inclusion of the site in the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA).

Sustainability Appraisal and Site Selection Process

3.The SA is a key piece of evidence which supports the policies and proposals of a development plan document. Indeed, it is the document which underpins the document being prepared. In preparing a SA there are a number of requirements which should be satisfied including: identifying reasonable alternatives and explaining why a preferred option has been selected and why other options have been rejected. It is an iterative process and the changes made at each stage should be documented. This should enable the reader of the SA to understand how a local planning authority has arrived at its preferred position.

4.When assessing individual sites, it is important that it is done in a consistent way. The assessment should be based on the existing situation and where mitigation is taken into account it should be clear where that is the case i.e. a mitigation-off and a mitigation-on approach. Where mitigation is applied any uncertainty about its delivery should be assessed. In circumstances where additional information provided by the promoters of sites is relied upon to inform the decision-making process it should be made clear that is the case and to make available the information is being relied upon.

5. The site assessment for Roundabouts Copse includes a number of inaccurate assumptions eg; there is no existing site access, access would be from Norton Welch Close, noise is seen as a potential issue and impact on ancient woodland. There is an existing site access to the A27, which the Highway Authority raised no objections to it being the location of the vehicle access in respect of the 2016 planning application. Noise was not raised as a significant issue by TVBC when it considered the application and the areas proposed for development would not result in the loss of ancient woodland.

6.The SA site appraisal of Roundabouts Copse is considered to be flawed in a number of specific respects, which are set out below.

Site Area

7.The SA has assessed the merits of the site as a whole rather than the area put forward for development, i.e. land for 30 dwellings ref SHELAA 406. It is considered that the assessment should be undertaken for the area proposed for development to provide a more robust analysis of the merits of the site. This would more closely align the assessment with the 2015 proposals which is a relevant source of information. See masterplan 24-022-SK02C and location plan attached to this submission.

Objective 1A)

8.Commentary. The small-scale nature of the site limits the scope to meet a range of housing needs. Policies HOU4 and HOU7 make provision for a range of housing with the later setting a threshold of 100 dwellings for self and custom build homes. All sites should have the same assessment outcome based on these policies.

9.Commentary. Typographical error the site capacity is estimated as 30 dwellings.

The commentary should be revised and the performance should be reviewed.

Objective 2A)

10.Commentary. The site is too small to include employment opportunities but is close to existing employment sites and the proposed employment allocation at the Test Valley Business Park, North Baddesley. That position should be reflected in the commentary.

The commentary should be revised to reflect the size of the proposed development.

Objective 2B)

11.Commentary. The site is approximately 1 Km from the Test Valley Business Park. The commentary should be amended to reflect the distance. It is also connected to the Business Park via public transport, the nearest bus stop is within approximately 300m. the commentary should either include text from Objective 3 H) or cross refer to it.

The commentary should be revised.

Objective 3A)

12.The promoters of Roundabouts Copse are owners of the site and their land ownership extend to the its boundary with Norton Welch Close. A pedestrian/cycle link can be provided which would mean that the distance to the pre-school facility is approximately 300m.

The commentary should be revised.

Objective 3B)

13.The distance to the infant and junior school is approximately 500m via Norton Welch Close.

The commentary should be revised.

Objective 3C)

14.Commentary. There is a frequent bus service accessible from the site within 400m as described out in Objective 2D)

The commentary should be revised and the performance should be reviewed.

Objective 3D)

15.The distance to a convenience store at Fleming Avenue is approximately 500m via Norton Welch Close.

The commentary should be revised.

Objective 3E)

16.The distance to the health centre is approximately 200m via Norton Welch Close.

The commentary should be revised.

Objective 3F)

17.The distance to the North Baddesley Community Association building on Fleming Avenue is 400m, via Norton Welch Close.

The commentary should be revised.

Objective 3I)

18.Commentary. There is an existing vehicle access to the A27 in the north east-corner of the site. It is the proposed location for a vehicle access as presented in the planning application 15/00800/OUTS. Although the application was dismissed at appeal there was no objection from the Highway Authority to the proposed vehicular access in this location. A pedestrian/cycle link can be provided to Norton Welch Close.

The commentary should be revised and the performance should be reviewed.

Objective 4C)

19. Commentary. The area proposed for development was used for the extraction of material for brick manufacture on-site. It is highly unlikely that there are any mineral resources of value remaining on the site. The size of the remaining area of land, its proximity to residential development and its ecological importance would suggest that it is not an appropriate location for mineral extraction

The commentary should be revised and the performance should be reviewed.

Objective 4D)

20.Commentary. The site includes a former landfill site which has been the subject of investigation. TVBC's Environment and Health officer's advice in 2015 was that any issues arising could be addressed via the use of planning conditions.

The commentary should be revised

Objective 6A)

21.Commentary. The text, it is assumed, is based on an assessment of the whole site rather than the area which is proposed for development. The areas at risk from surface water flooding are primarily located outside of the area proposed to be considered for development ref EA Flood Risk mapping January 2024.

The commentary should be revised and the performance should be reviewed.

Objective 8A)

22.The criteria includes landscape character and protected landscapes which should be assessed independently of each other to achieve a more accurate assessment.

23.With regard to landscape character the proposed development site is located in LCA2B North Baddesley to Chilworth Woodland Mosaic, the same LCA within which Velmore Farm is located. Both sites have been assessed in the SA as having a 'mixed performance' which is difficult to understand given the commentary for Velmore Farm in the Landscape Sensitivity Study which describes its location as being in 'a landscape of high overall sensitivity'.

24. The Study in assessing Roundabouts Copse's overall landscape sensitivity to change came to a conclusion based on a large scale residential and mixed use development which clearly is not what is being proposed ref para 1.1.361 page 88. The assessment of the site should be revisited and a separate analysis undertaken rather than to be combined with land at Packridge Lane.

25.There is a significant inconsistency in the commentaries for both sites in that there is a reference to the local gap in respect of Roundabouts Copse but no reference as far as Velmore Farm is concerned. The reference to the local gap should be deleted as it is not a relevant factor in assessing landscape character and is not a protected landscape.

26.The commentary should be revised and the performance should be reviewed.

Objective 8B)

27.The criteria refers to how well a site relates to an existing settlement and surrounding area. Roundabouts Copse and Velmore Farm are assessed as having the same impact. It is difficult to see how that conclusion has been arrived at. Roundabouts Copse adjoins North Baddesley Infant and Junior Schools, the residential development at Norton Welch Close and

the house which front the A27 Botley Rd (see masterplan 24-022-SK02C and location plan attached). It can deliver a convenient pedestrian/cycleway link to local facilities without the need to cross a well-trafficked road (Templars Way). It is well screened by existing landscape features and between it and the open countryside to the south east is the Chilworth Golf Course and driving range. In comparison Velmore Farm is a proposal for 1000 plus homes on elevated land south of Templars Way.

28.The commentary should be revised and the performance should be reviewed

Objective 8C)

29.Commentary. Roundabouts Copse is assessed as having the same impact on the separation of settlements as Velmore Farm. Roundabouts Copse would result in a modest reduction in the extent of the proposed local gap between North Baddesley and Chilworth of approximately 80 metres, if the existing and proposed landscaping was included within the boundary of the Gap. In terms of the visual separation the development of 30 dwellings would be viewed in the context of the existing extensive on-site and off-site landscaping and any new landscape planting, the existing development of at the Golf Course. Any assessment should also take account of the proposed battery storage facility the subject of a current application on land on the east side of the A27.

30.This impact compares with that at Velmore Farm which would extend approximately 1.3km along the boundary with Templars Way and Castle Lane. The elevated nature of the site would mean that development would have a significant visual impact.

31.Given the scale of development proposed at Velmore Farm compared with that at Roundabouts Copse and the scope to soften the impact by retaining and enhancing existing landscape features there should be a significant difference in the 'scoring' of the two sites.

32.The Local Gaps Assessment recommended that "Consideration could also be given to reviewing the extent of the gap in the north-west, in relation to the small, contained area of land between North Baddesley and the woodland north of the golf course.' Ref page 47. This would suggest that excluding the area proposed for development would not undermine the purpose and function of the gap

The commentary should be revised and the performance should be reviewed.

Objective 10B)

33.Commentary. The area of Ancient Woodland is outside of the area proposed for development. A buffer zone can be established between ancient woodland and the area of proposed housing protecting special areas of antient woodland with public access. The issue of impact on the Ancient Woodland was considered as part of planning application 15/00800/OUTS. Natural England and Hampshire County Council raised no objection to the development in respect of its impact on the Ancient Woodland. This has a significant impact on the assessment of the site. The site at Ganger Farm South includes an area of Ancient

Woodland but the assessment under that criteria has come to a different conclusion in terms of performance.

The commentary should be revised and the performance should be reviewed.

Objective 10C)

34.Commentary. The development of the open areas would not result in 'the loss of existing areas of established trees and woodland' as described in the commentary. TVBC's arboriculture officer did not object to the proposal for 33 dwellings, ref 15/00800/OUTS having regard to the existing TPO's. They did have some concerns regarding the implementation of any permission but advised that they could be addressed at the detailed planning stage. There is potential for a small nature reserve within the ancient woodland with public walking routes, as well as safeguarding the SINC habitat and TPOs. An actively managed woodland being included within the site will remove the antisocial nuisance currently being caused by the unlawful access of cars and motorbikes.

35.The criteria against which the merits of the site are being assessed is referring to the impact of development on local green infrastructure provision. There is no discussion in the text of the potential for the positive management of the area of ecological importance, the SINC or the Ancient Woodland, as proposed and accepted by Natural England in respect of the planning application. The potential for approximately 4Ha of land to be managed for its ecological interest should be recognised under this criterion.

36. The commentary should be revised and the performance should be reviewed.

Objective 10D)

37.Commentary. The area of Ancient Woodland is outside of the area proposed for development. A buffer zone can be established between ancient woodland and the area of proposed housing protecting special areas of ancient woodland with public access. The issue of impact on the Ancient Woodland was considered as part of planning application 15/00800/OUTS. Natural England and Hampshire County Council raised no objection to the development in respect of its impact on the Ancient Woodland.

38.TVBC's arboriculture officer did not object to the proposal for 33 dwellings, ref 15/00800/OUTS having regard to the existing TPO's. They did have some concerns regarding the implementation of any permission but advised that they could be addressed at the detailed planning stage.

The commentary should be revised and the performance should be reviewed.

Objective 11

39.Commentary. The commentary and performance under this criteria should be reviewed in the context of the information now provided in respect of the objectives 3,4,5,6 and 10. In particular the reference to the site being heavily constrained is inaccurate.

The commentary should be revised and the performance should be reviewed

Objective 12C)

40.Commentary. There are no Public Rights of Way through the site whose character would be altered if development were to take place. However, the development of the site would enable public access to the area to the south and that should be reflected in the commentary. The opportunity to enhance the Southern Ancient Woodland area bringing value to the local community with walking routes and dog walkers will be of great benefit, particularly for residents on the west of the A27 who would not need to cross the A27 to access public open spaces.

41.Development at Velmore Farm will have significant impact on a PROW and have a fundamental impact on their setting, becoming urban in character. However, in terms of the assessment of Roundabouts Copse it is given the same 'score' which is difficult to understand.

The commentary should be revised and the performance should be reviewed

Objective 12D

42. Commentary. Noise was not raised as an issue in respect of the 2015 planning application. It is not clear what evidence TVBC is relying upon in reaching its assessment.

The owners have instructed a noise report by Venta Acoustics, as is submitted, that shows that the development is within acceptable ranges especially with the houses being set back from the road to create a noise buffer zone.

"It should be noted that the site is located on the edge of large residential area, with many other dwellings in the area likely to be exposed to similar levels of noise. It is considered that following the Good Acoustic Design process, where practicable within the constraints of the site, a high level of amenity for future residents can be achieved".

The commentary should be revised and the performance should be reviewed

Conclusion

43.The commentary/summary that the site is heavily constrained is not justified given the available evidence and an assessment based on the area proposed for development. TVBC's own local gaps study concluded that the boundary which included the site was worthy of review. The site is located adjacent to the existing settlement boundary and relates well to the settlement edge.

Site Selection

44.The merits of the site were tested via the site selection process which comprised a number of stages. At the conclusion of stage 5 it was a site to be taken forward for assessment.

45.Following stage 5 a preferred pool of sites was identified ref paragraph 5.70 of the ISAR. There is no content within the ISAR or the Site Selection Topic Paper to explain how the preferred pool was arrived i.e.; why sites such as the Roundabouts Copse which made it to stage 5 was not included. There is no reference to any selection process or criteria for what is a key stage in the decision-making process as it is from this preferred pool that the proposed site allocations are drawn. Paragraph 5.87 refers only to the previous stages of the process. It is not clear why sites were considered for inclusion

46.It would be fair to conclude that there were at least two further stages in the site selection assessment which resulted in the elimination of a number of sites such as Roundabouts Copse and the creation of the two-tier category of constants and variables.

47.The selection process is concluded for southern Test Valley in Figure 6 of the Site Selection Paper. It includes the sites proposed for development for housing in the Regulation 18 Part 2 local plan including land at Upton for 80 dwellings. A site which was not in the list of preferred pool and was not included in the Growth Scenario Testing.

48.A key part of the SA process is the assessment of reasonable alternatives. The approach taken by TVBC has not enabled such an assessment to take place.

49.The assumption that a number of sites are 'constant' i.e.; included within all the growth options and a number of sites are 'variables' has the effect of restricting the testing and evaluation of scenarios.

50.The flawed analysis of site assessments forming the bottom up approach has had the effect of ruling out sites which compare favourably with sites which formed part of the preferred pool and shaped the content of the four Growth Scenarios.

51.This approach adopted by TVBC restricted the assessment of reasonable alternatives as there is no scenario which explores a more dispersed approach across the Tier 1 and Tier 2 settlements which would be consistent with the strategic factors identified in paragraph 5.67 of the ISAR. Such an option could have included a range of size of sites.

Conclusion

52.The commentary/summary that the site is heavily constrained is not justified given the available evidence and an assessment based on the area proposed for development. TVBC's own local gaps study concluded that the boundary which included the site was worthy of review. The site is located adjacent to a Tier 2 settlement and relates well to the settlement edge.

53.The SA and the process of site selection on which Policy SS6 does form a sound basis for the justification for the proposed allocations. The methodology is unclear and both should be reviewed.

Spatial Strategy

Policy SS1 Settlement Hierarchy

54.The proposed settlement hierarchy is the cornerstone of TVBC's approach to delivering its spatial strategy and sustainable development. North Baddesley is placed in Tier 2 where the scale of development is acceptable in principle and includes strategic housing allocations. That approach is supported.

Housing Distribution

Policy SS6 Meeting the Housing Requirement.

55.The SA and site selection process has resulted in the non-allocation of Roundabouts Copse a site adjoining a Tier 2 settlement with no over-riding constraints. Its omission means that there are no small sites proposed for development despite paragraph 3.53 of the local plan identifying the need for a sufficient supply and mix of sites.

56.Spatial Strategy Policy6 (SS6) Meeting the Housing Requirement identifies the proposed sites in the Southern Housing Market Area(SHMA). There is a lack of a mix of sites, particularly small sites. Paragraph 70 of the NPPF advises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area. Local planning authorities should promote the development of a good mix of sites.

57.In the local plan the proposed supply of housing is predominantly to be delivered by large sites eg Hoe Lane 300, Whitenap 1300 and two of the five proposed allocations are for 340 and 1070 dwellings respectively.

58.Large sites will have a longer lead-in time to commencement of development, particularly where there are major infrastructure issues to be addressed, which can have a significant impact on the delivery of a continuous five-year supply of housing land. The inclusion of smaller sites can help with the delivery of the local plan requirement particularly in the early years of the plan period.

59.TVBC have consistently over-estimated the capacity of large sites to deliver the completions assumed in its housing trajectories in recent years. The local plan trajectory is similarly over-optimistic eg it assumes that two of the allocated sites at Ganger Farm and Romsey By-Pass will be delivering significant completions as early as 2026/27, that is in only two-year's time and assumes that Velmore Farm will be delivering completions in 2028/29.

60.The Trajectory also assumes high rates of completions on the large sites and that the rates would be maintained over a significant period of time. This approach is likely to result in an uneven supply of housing particularly in the early years of the local plan.

61.The proposed allocation at Upton for 80 dwellings would be expected to be phased early in the plan period given its size. However, the Trajectory does not include any completions until 2036/37 which suggests there is significant uncertainty regarding its delivery, one assumes due to its constraints and relationship with the proposed employment allocation.

Conclusion

62.The local plan is over-reliant on large sites to deliver the housing requirement to 2040. It does not provide a range and choice of sites, particularly small sites. The land at Roundabouts Copse has considerable merit in being allocated for development capable of providing a small deliverable housing site at a Tier 2 settlement.

63.The Plan should be amended to include land at Roundabouts Copse, North Baddesley, for housing. See masterplan 24-022-SK02C and location plan attached.

Policy ENV4 Local Gaps

64.The policy proposes a local gap between North Baddesley and Chilworth. The boundary of the gap is shown in Inset Map 3. It includes Roundabouts Copse which is located immediately adjoining the village.

65.TVBC commissioned consultants Stephenson Halliday to undertake a Local Gaps Assessment (December 2023). The report set out a number of criteria against which the merits of the existing local gaps were reviewed. It also took account of planning decisions where development in a gap had been permitted or refused including the dismissed appeal for development at Roundabouts Copse ref application 15/00800/OUTS.

66.Under the criteria: *areas and features that provide separation between settlements* the study concluded that

‘The golf course, woodland block immediately west of the Local Gap (Calveslease Copse) and fields within the Local Gap provide important separation between North Baddesley and the Conservation Area at Chilworth Old Village.’

67.There is no specific reference to the role played by Roundabouts Copse.

68. The study concluded that *‘Consideration could also be given to reviewing the extent of the gap in the north-west, in relation to the small, contained area of land between North Baddesley and the woodland north of the golf course.’*

69.It is clear that the contribution that Roundabouts Copse, and in particular, the area proposed for development was not considered critical by the consultants to maintaining the separation of the two settlements.

70.The case for a further review of the proposed boundary is strengthened by the proposal for a battery storage unit which TVBC is minded to permit.

71.Planning application 22/03346/FULLN battery electrical storage system. There is a current proposal to construct a storage facility on the east side of the A27 south east of Wren's Copse. It comprises 32 battery units 3.1m high including the bases, access, hard standing, landscaping, security fencing, lighting and CCTV.

72.The proposed development extends development into the open land north of the A27 by approximately 100metres. It is a significant incursion into the gap which TVBC's landscape officer has raised no objection on the basis that 'the proposed buffer would in time successfully mitigate the proposals and integrate within the wider landscape' 13.7.23.

Conclusion:

73.TVBC need to allocate land to meet the future development needs of the borough. In assessing the merits of sites, it is appropriate to review existing policy constraints including the local gaps policy. TVBC's own study on local gaps highlighted the potential to review the North Baddesley-Chilworth local gap boundary where it includes Roundabouts Copse. There is an opportunity to provide an enhanced and permanent green buffer to the Local Gap with public access for the local community whilst protecting and positively managing areas of ecological importance. In that context, a modest revised boundary to enable a small-scale development with good access to services and facilities which retains a significant area of undeveloped land of ecological and landscape value which retains the separation of the two settlements is justified.

74.The proposed boundary of the North Baddesley-Chilworth Local Gap should be revised to omit land at Roundabouts Copse, North Baddesley.

26 March 2024

Dear Sirs

VA5206 ROUNDABOUT COPSE, NORTH BADDESLEY

Pre-Survey Stage 1 Risk Review

It is proposed to develop the land at Roundabout Copse for residential use, configured in the approximate manner shown in Figure 1 below.



Figure 1 – site layout

Test Valley Borough Council's initial appraisal of the site under objective 12 (Seek to maintain and improve the health and wellbeing of the population) has raised concerns about noise with regards to night-time noise levels (*Any part of the site is likely to be exposed to: night time road traffic noise >50 dB(A) L_{night}*) due to the proximity to the A27 to the east., which changes from a 30mph to 50mph just to the south of the site boundary.

As an initial review of the site prior to application, Venta Acoustics has been appointed to discuss the requirements in relation to relevant guidance and provide comment on likely mitigation measures that may be required to protect future residents.

ProPG (Professional Practice Guidance: Planning and Noise) 2017 has been jointly developed by the Institute of Acoustics (IOA), the Association of Noise Consultants (ANC) and the Chartered Institute of Environmental Health (CIEH) to guide Local Planning Authorities (LPAs) and Practitioners in assessing the suitability for residential development on sites predominantly exposed to airborne transport noise.

The guidance advocates a proportionate and risk based 2-stage assessment approach.

Stage 1 is an initial noise risk assessment of the site, based on measurements or predictions, in the absence of mitigation or consideration of the proposed layout. A risk category is assigned to the site as follows:

Risk Category	Indicative Daytime Noise Levels $L_{Aeq,16hr}$	Indicative Night Time Noise Levels $L_{Aeq,8hr}$	Pre-Planning Application Advice
Negligible Risk	< 50 dB	< 40 dB	Indication that the development site is likely to be acceptable from a noise perspective and application need not normally be delayed on noise grounds.
Low Risk	50 - 60 dB	40 - 50 dB	Indication that the development site is likely to be acceptable provided a good acoustic design process is followed and is confirmed in a detailed Acoustic Design Statement confirming how noise will be mitigated
Medium Risk	60 - 70 dB	50 - 60 dB	
High Risk	> 70dB	> 60dB	Indication that the development site may be refused on noise grounds unless a good acoustic design process and detailed Acoustic Design statement can demonstrate the significant noise risk can be mitigated.

Notes

- Indicative noise levels should be assessed without inclusion of the acoustic effect of any scheme specific noise mitigation measures.
- Indicative noise levels are the combined free-field noise level from all sources of transport noise and may also include industrial/commercial noise where this is present but is “not dominant”.
- $L_{Aeq,16hr}$ is for daytime 0700 – 2300, $L_{Aeq,8hr}$ is for night-time 2300 – 0700.
- An indication that there may be more than 10 noise events at night (2300 – 0700) with $L_{Amax,F} > 60$ dB means the site should not be regarded as negligible risk.

The table suggests hard boundaries between risk categories based on values. The intent is a more considered and progressive increase in risk level as noise levels increase.

Table 1.1 – ProPG Stage 1 Site Noise Risk Assessment

Stage 2 is a detailed assessment of the proposals with consideration of four key elements:

- Element 1 – demonstrating a “Good Acoustic Design Process”
- Element 2 – observing internal “Noise Level Guidelines”

- Element 3 – undertaking an “External Amenity Area Noise Assessment”
- Element 4 – consideration of “Other Relevant Issues”

Stage 1 Assessment

Interrogation of the England Noise Map, a predictive model of noise levels across the UK, suggests that the noise levels on site during the night-time would be below 50dB L_{night} , as can be seen in Figure 2.



Figure 2 – National noise map (night-time)

Although this is based upon modelling rather than site measurement, it would suggest the site is either quieter than 50dB(A) at night, or in any event, towards the lower end of the ‘medium risk’ range in the Stage 1 ProPG assessment.

Should noise levels be shown to be higher than 50dB(A) during the night-time once surveys have been undertaken at a later date, a suite of measures could be adopted to reduce noise to the most affected areas. Some of these recommendations have already been included in the layout for the scheme.

- Houses set back from road to create a noise buffer zone
- Scheme will be designed so that internal noise levels achieve the recommended limits set in BS8233: 2014 either through the use of ventilators or mechanical ventilation, dependent upon the actual on site noise levels.
- Orientation of houses to minimise exposure to the road and site layout to promote screening from roads
- Internal arrangements optimised where possible to locate noise sensitive rooms on less affected façades

- Where rooms cannot be arranged to minimise noise exposure, installation of high flow acoustic ventilators, such as full height openable, acoustical louvre panels, to allow rooms to be suitably ventilated whilst keeping windows closed

The noise exposure across the site, and the potential mitigation measures required, will be investigated as the scheme progresses, and full surveys have been undertaken.

It should be noted that the site is located on the edge of large residential area, with many other dwellings in the area likely to be exposed to similar levels of noise.

It is considered that following the Good Acoustic Design process, where practicable within the constraints of the site, a high level of amenity for future residents can be achieved

We trust the above to be of assistance. Please do not hesitate to contact us with any queries you may have.

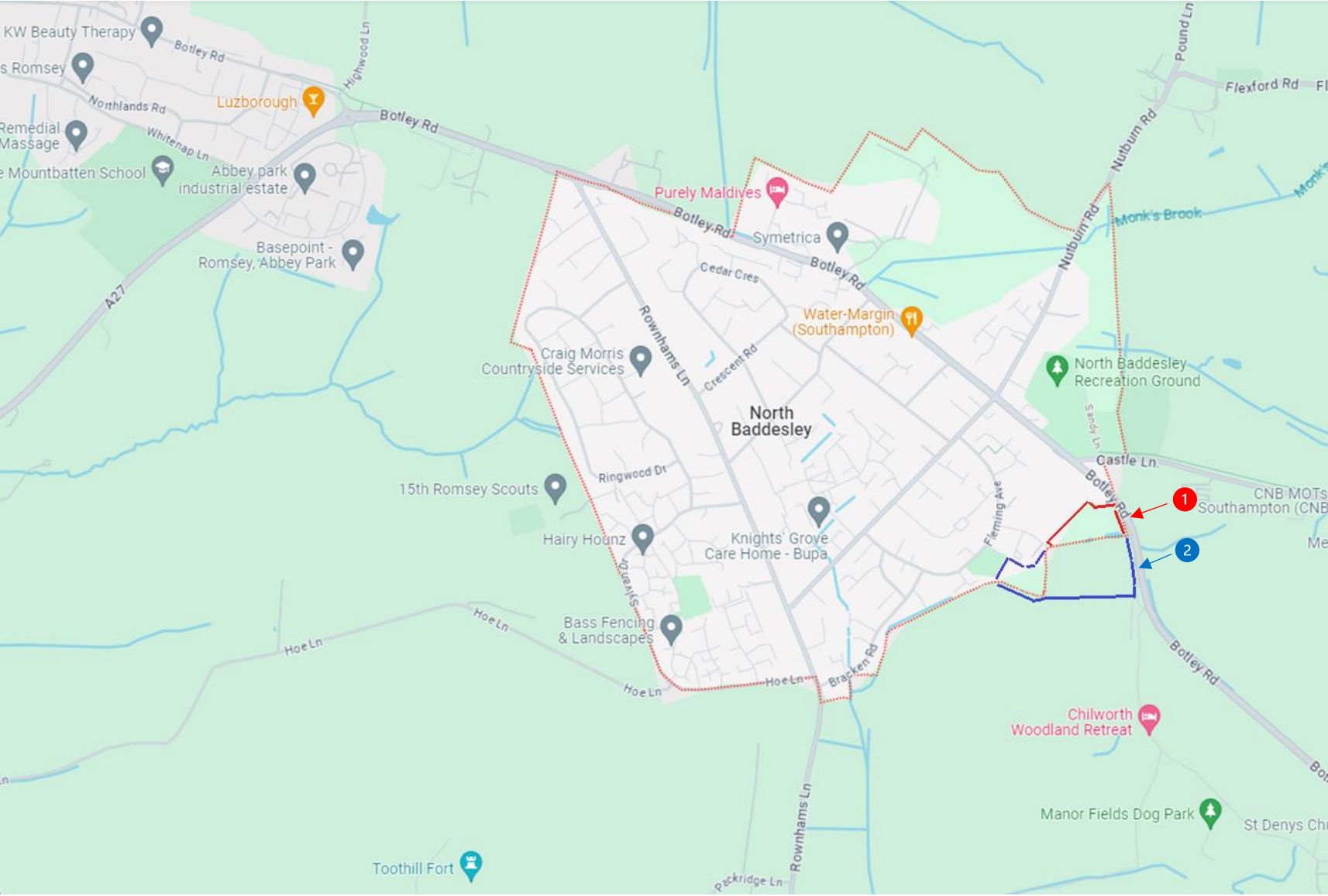
Yours sincerely
on behalf of Venta Acoustics

Jamie Duncan



Roundabouts Copse, Botley Road, North Baddesley

Proposal for land adjoining the current built up area with larger area protecting special areas of antient woodland with public access.



Key:

- Proposed Housing Area
- Green Buffer Area

1

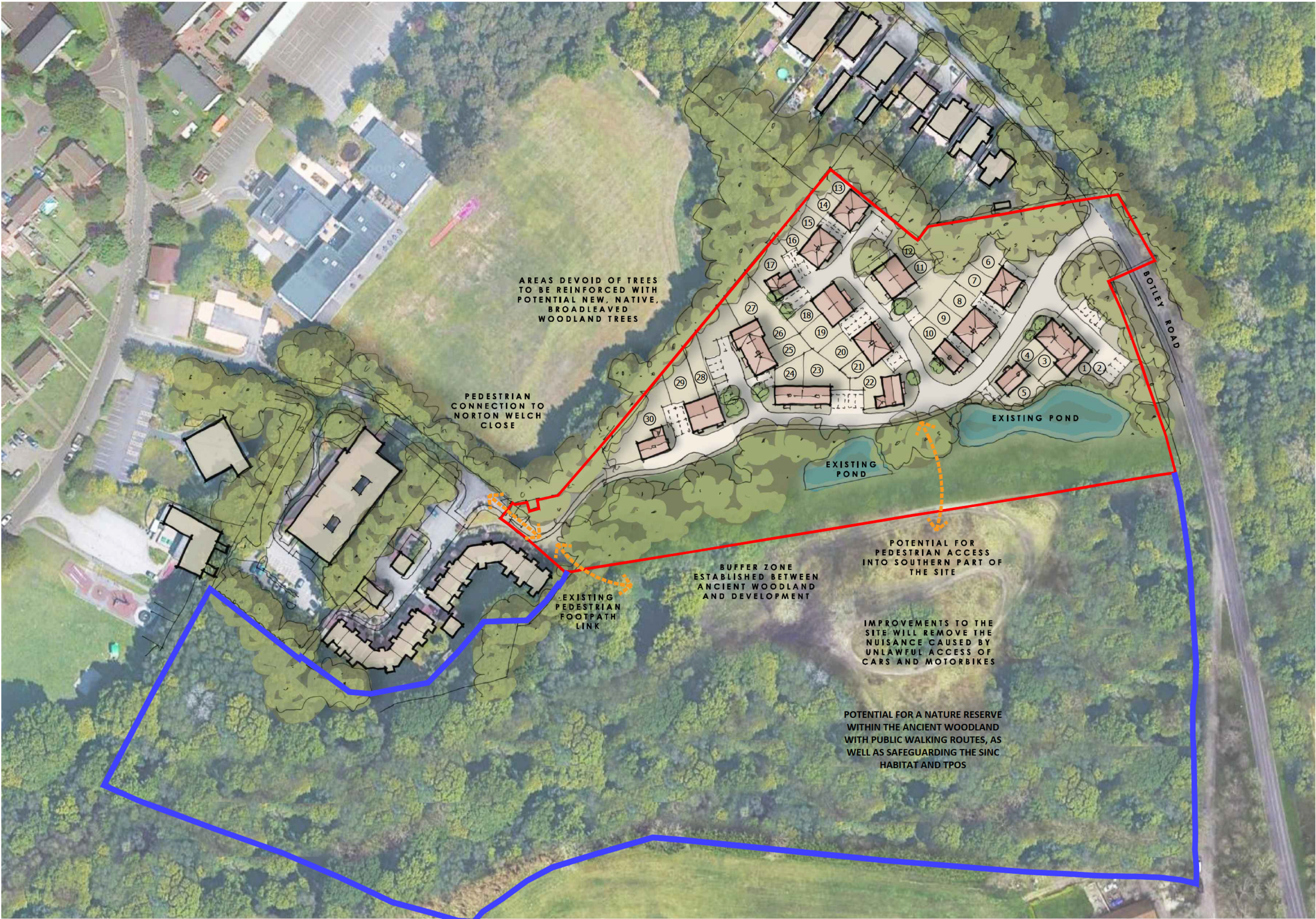
Proposed housing to north of redline area adjoining settlement, with an additional green buffer area to the south of the redline area.

2

Opportunity to provide an enhanced and permanent green buffer to the Local Gap with public access whilst protecting the many special characteristics.

Approximately 4Ha of land to be positively managed as areas of ecological importance. There is the opportunity to enhance the area and for the local community to be able to access. Further potential for a nature reserve within the ancient woodland with public walking routes, as well as safeguarding the SINIC habitat and TPOs.





Sketch layout based on OS information. Should be checked and coordinated against a measured survey and services information to be supplied by client

LAND TO THE WEST OF BOTLEY ROAD

NORTH BADDESLEY

AWBURY HOLDINGS

Project & Drawing title
ILLUSTRATIVE SITE PLAN

Drawn	Date	Checked	Date	Scale at A2
CJP	Mar 24	HKS	Mar 24	1:1000
Job N°	24-022	Drawing N°	SK02	Rev.
Status	PRELIMINARY DRAWING			

