

From: [REDACTED]
To: [REDACTED] [Planning Policy](#)
Cc: [REDACTED]
Subject: Test Valley Local Plan 2040, Regulation 18 - Stage 2 Consultation.
Date: 01 April 2024 13:14:23

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Dear Sir

Please find below the Chilworth Parish Council comments in relation to the **Test Valley Local Plan 2040, Regulation 18 - Stage 2 Consultation**.

Settlement Boundaries

Chilworth Parish Council appreciates the value of the Settlement boundaries which we agree to be a planning tool to direct development to the most sustainable locations whilst protecting the character of the countryside. Chilworth is somewhat unique in several ways, most of all is its close proximity to Southampton City, the Borough of Eastleigh, Chandlers Ford and Valley Park as well as the criss-crossing of its parish land by two motorways and two A class roads. The Chilworth settlement boundaries provide greater certainty for our community as well as giving an indication to landowners and developers over where certain types of development might be deemed acceptable in principle. The areas outside of our defined boundaries are classed as countryside for the purpose of planning policy. We are aware that the Adopted Local Plan 2016 methodology used for establishing settlement boundaries has been reviewed and amended and that the methodology is a technical assessment, but without guidance set nationally on how to undertake the process.

Chilworth is a Tier Two settlement under the Settlement Hierarchy Assessment and as such has an existing settlement boundary which is shown on the Policies Map.

Chilworth Parish Council, other than in our references below to answering **Appendix 1 Settlement Boundary Assessments**, wishes for the existing settlement boundary to remain as shown on the Policies Map, the only change, acceptable to Chilworth Parish Council, would be a policy where it can be shown that an existing and approved development of a dwelling is directly adjacent to the settlement boundary and to an existing dwelling inside that boundary. Furthermore, such a developed dwelling must not lead, by its nature or position, to any expansion of the settlement boundary by virtue of its available access to additional areas of the countryside, nor shall it permit the reduction of any of the local gaps.

Appendix 1 Settlement Boundary Assessments

Manor View (south of Manor Road), adjacent to Science Park

Chilworth Parish Council agrees that Manor View (dwelling) is partially within the settlement boundary and the whole dwelling should be included to correct this anomaly.

Comment

Chilworth Parish Council comments that the settlement boundary relates only to the curtilage of the dwelling as detailed by its fencing. Assurance must be given that it does not include the footpath which is on the outside of the boundary of this dwelling and is the property of Flemming Estates.

The Garden House (Woodside)

Chilworth Parish Council agree that the outbuilding within the Garden House (residential plot) is partially within the settlement boundary and that this anomaly should be corrected with the whole residential plot included within the settlement boundary.

Additional Information

Chilworth Parish Council points out to the Borough that there are several existing residential plots in Woodside which are detailed as being outside of the Settlement Boundary and as such must be assessed for their inclusion within the said boundary and removed from the countryside. That said, we would require our above-mentioned requirement when assessing any changes, to be vigorously included within any assessment made by the Borough.

Chilworth Parish Council therefore agrees the Boundary Recommendations in that the following areas are proposed for inclusion within the settlement boundary:

- Manor View (south of Manor Road), adjacent to the Science Park
- The Garden House (Woodside)

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Chilworth Parish Council agrees that the two storey side extensions, new roof dormers and erection of detached garage with playroom, does not require change to the settlement boundary as the extension to the dwelling from planning permission is within the existing settlement boundary.

Hutwood Court and Builders Yard (off Bournemouth Road)

Chilworth Parish Council agrees that there is an anomaly in this location where the Chilworth settlement boundary does not include the whole area within built development to the settlement boundary of Eastleigh and as such needs to be corrected. It is further agreed that the Boundary Recommendation, in that the following area needs to be completely included within the settlement boundary:

- Hutwood Court and Builders Yard (off Bournemouth Road) (including the land adjoining the boundary to Eastleigh).

Policy LE2 South of Benham Campus, University of Southampton Science Park (as shown in Map Area 1 of the Appendix)

Chilworth Parish Council agrees with the recommendation for the area of the adopted Local Plan boundary to be brought within the settlement boundary. However, at this point Chilworth Parish Council suggests that the recommendation is **amended** to include the dwelling and associated buildings of Kennels Farm within the settlement boundary as this is adjacent to the proposed inclusion of the Benham Campus, thereby forming an anomaly for its exclusion.

Policy COM5 Park Farm Stoneham (Map Area 2)

Chilworth Parish Council advises caution in regard to the allocation of the site to be included within the settlement boundary. This caution is based upon recent developments taking place within the adjacent boundary area of Eastleigh Borough Council. We would not wish to see any land allocated within this settlement area, which in its nature is countryside, to be associated with any existing dwellings. Furthermore, we seek to ensure that care is taken in that the area known as the 'Fishing Lakes', and which is associated with Eastleigh Fishing Club, must remain within the countryside.

Chilworth Community Centre, Chilworth Old Village

Chilworth Parish Council requires that the building known as the 'Chilworth Community Centre', together with all of its associated land detailed within the covenant provided for community use, is excluded from the settlement area. This is in order to preserve its original intention as an area set aside for the use of the community and as such through its designation as countryside cannot become easily available for any other development.

Note:

Please note that Chilworth Parish Council does not consider the current proposed development of a Lithium battery Storage facility (BESS) as being a 'Renewable Energy Development' under the classification of the agreed scale of development, as shown in the **Spatial Strategy Policy 1 (SS1): Settlement Hierarchy diagram**.

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

Chilworth Parish Council strongly opposes the development of Southern Area Policy 6 at Velmore Farm on a number of reasons, the two prime reasons are:

Firstly, Velmore Farm is located in the green space of the south eastern part of the

Borough adjacent to Valley Park. The land includes as mentioned in the report, the large woodland areas of Hut Wood and The Rough Sites of Importance for Nature Conservation (SINC) to the south and west of the site. There is a Public Right of Way (footpath) along the south site boundary and a Public Right of Way (byway) along the west of the site. The allocation of a significant area of publicly accessible 'Green Space' in the south-west corner of the site would therefore be considered to be poor compensation for the loss of what is already an important green space in its own right.

It is questioned by Chilworth Parish Council how this suggested small section of 'Green Space' compensates for the loss of the majority of Chilworth's existing green space?

The existing Green Space already provides opportunities for access to the countryside, the development will significantly diminish the size of the green space available to the public. The suggestion that additional work will be required to refine the precise area and nature of the green space to inform the Regulation 19 document is nothing more than beautifying what is left of the green space in an effort to be seen as compensation for the loss of the majority of the existing green space..

Secondly, the land is in the local gap between Chilworth and Valley Park. The proposal for the local gap between Southampton and Eastleigh to be amended to reflect this proposed site is unacceptable and is effectively the removal of the existing local gap with a replacement narrow border. This would only be a poor attempt to define the existing settlement area of Chilworth and the proposed 1070 homes which will triple the size of the parish of Chilworth. This suggested amended local gap boundary to the south of the site is not acceptable by Chilworth Parish Council as a method of preserving or even providing a discernible local gap. As mentioned previously, the small remaining area is far from significant Green Space in the southwest corner of the site and would become an ironic contribution to the distinction between the developed area and the Local Gap.

Chilworth Parish Council asks how consideration of this site can be justified when the site falls within the recreational impact zone for the New Forest Special Protection Area (SPA), and as a result there would be a necessary need to provide appropriate mitigation including Suitable Alternative Natural Greenspace (SANG), which would have to be provided in accordance with **Policy BIO2**. Furthermore, we ask why the site is being considered when the south east part of the site falls within the 5.6km buffer of the Solent Special Protection Areas (SPAs) and associated recreational impact zone and the remainder of the sites in adjacent to this. Section 4.196 clearly identifies those certain new developments within 5.6km of the Solent SPA designations, including the Solent and Southampton Water SPA, are likely to have a significant effect when considered in combination. Both these points would require 'appropriate mitigation' so as to be acceptable and in accordance with the Solent Recreation Mitigation Strategy. It is clear to Chilworth Parish Council that this inappropriate development is contrary to these two policies.

The site is surrounded by residential development to the north, east and south east which contain key facilities which are acknowledged to be stretched to breaking point. This site would need to generate a requirement for more than a 1.5 form entry (FE) primary school on site. The North Baddesley infant school and primary schools are already at full stretch and would likely fail to accommodate the growing need from this development despite the suggestion of an additional primary school. There is no mention however of the likely adverse effect on senior schools in the area.

The suggestion that the site will need to provide non-commercial community facilities, such as a community centre, or to improve existing facilities in the local area would be a major requirement as facilities such as the North Baddesley and the Valley Park Doctor surgeries are constantly declaring long waiting lists for patients. These probable shortfalls will make the development unsuitable and unsustainable by the existing facilities. Undoubtedly the suggestion that further technical evidence of market demand for commercially-led facilities will be required in the context of existing local facilities such as to the north at Knightwood and to the east at Winchester Road, would be a consideration which must also influence the decision not to build on this site.

Section 4.199 of the document states that there are 'small areas at risk' of surface water flooding along the western boundary and southwestern area of the site and that sequential approach will need to be taken to locate development in areas of lowest flood risk in accordance with national policy. It is well known that the proposed land for this site has a general slant towards Castle Lane and Templars Way which in past years has been the location of deep flooding which additionally affects School Lane with the considerable deep-water depths are at its lowest point in that road. Chilworth Parish Council therefore questions how the growing amount of rainwater and proposed wastewater from this site is anticipated to successfully feed into treatment works which are linked to the River Itchen Special Area of Conservation (SAC), thereby requiring appropriate mitigation will be achieved in accordance with **Policy BIO2**? The existing flooding problem is already significant, we would further ask how additional wastewater and land runoff could satisfactorily be coped with to the extent that there would be no residual effect on Valley Park and its surrounding area.

The Parish of Chilworth has important Roman roads and Ox Drove that cross the settlement in several directions all of which are presently in green space. The course of a former Roman road which runs southwest across the proposed development site is a prime example of Roman and later settlements in the area. Chilworth Parish Council agrees with the likelihood of surviving earthworks should be identified and should be acknowledged as a feature of the layout and design of the development promoting its historic significance. We agree that, prior to any consideration to develop Velmore Farm, an Archaeological Assessment will be required to assess the Roman Road and any potential impacts, stressing that such impacts must not be disregarded and must not permit the development of this site.

The existing National Grid overhead powerlines running through the site, and which are agreed would influence the layout and design of development on the site are the only mention of high voltage cables. The current proposal for a lithium battery storage facility in the local gap between Chilworth and North Baddesley would also require consideration in relation to its cabling requirements to the substation in Templar's way. This would be an additional reason why Chilworth Parish Council objects to both of these developments.

The surrounding roads are presently in constant heavy use, the permitting of this development would have a critical traffic impact on locations such as School Lane and its associated roundabout, the Asda roundabout, Castle Lane and the North Baddesley junctions. There would be additional pressure on the Chandlers Ford shops and services especially where parking can already be seen to be congested.

In summary, Chilworth Parish Council opposes the proposal to develop the land known as Velmore Farm, in that, it is contrary to the Borough's document section '**Development in the Countryside' Section 3.45'** whereby the Council is failing in its commitment to create and maintain sustainable rural settlements by permitting this development. The Borough's spatial strategy and policies which seek to support and enable appropriate development in the rural areas of the Borough to meet local needs whilst ensuring that proposals do so, is in direct conflict with the policies which aim to respect the environment by the removal of the 'Green Space' and the diminishment. and thereby effective removal, of 'The Local Gap'.

Southern Area Policy 12 (SA12): Kennels Farm, University of Southampton Science Park, Chilworth

Chilworth Parish Council is aware through its regular meetings with University of Southampton Science Park of the strategic employment allocation of the approximate 3.9 hectares of Hampshire County Council's asset at Kennels Farm which is adjacent to the University of Southampton, Chilworth.

Chilworth Parish Council promotes caution in relation to the development which it is accepted will need to have a positive relationship with the wider Science Park as a whole. It is agreed that any development would be permitted subject to certain conditions much of which reflect the current ethos relating to the existing arrangements of the facility. We would therefore agree that any proposed development for the provision of employment must comprise that of research and development including associated design and limited ancillary production within. It is understood that any development would include offices, research and development and industrial processes, none of which must be out of character or scope of the existing development requirements for the Science Park. It may be considered acceptable that, where any ancillary non employment uses are proposed, these will primarily support the onsite businesses, their employees or visitors.

Chilworth Parish Council advises that any development that increases the employment of the Science Park would, in itself, generate additional vehicle movements to and from the

location. This aspect will require careful consideration by Hampshire Highways to complete necessary development to the entrance to the Science Park from the A27.

The Parish Council notes that a proposed sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking into account flood risk from all sources including surface water flooding. This is of significant importance as the land in question reduces height towards Tanners Brook which borders the western boundary of the site. Chilworth Parish Council would consider a buffer to Long Copse Ancient Woodland and Site of Importance to Nature Conservation as an important feature should planning permission be granted for any development on this land. It is agreed that as a result of woodland and motorway boundaries, the access to the development would be restricted via Benham Road through the existing Science Park. Chilworth Parish Council reserves its right to oppose any development of Kennels Farm if it is felt that it is deemed unacceptable or contravenes any existing policies.

Chilworth Parish Council again questions as to why the existing dwellings and other buildings, which form Kennels Farm, are not already included in the Chilworth Settlement area.

Renewable and Low Carbon Energy

Chilworth Parish Council supports the provision of renewable and low carbon energy which has a role to play in the transition towards net zero. We agree that national policies recognise the role of such technologies in enhancing energy security, and as such, accept the policy aims to facilitate and enable the supply of renewable and low carbon technologies and identification of potentially suitable areas for specific technologies.

Chilworth Parish Council notes that Test Valley Council declared a climate emergency, and in 2020 approved its first Climate Emergency Action Plan. We approve the specific action to ensure that policies in the Local Plan 2040 are written to facilitate the move towards carbon neutrality and join the commitment by the Borough Council to reduce emissions and support adaptation to the effects of a changing climate.

However, Test Valley Borough renewable and low carbon energy proposals will include schemes for supporting infrastructure such as energy storage schemes. Chilworth Parish Council points out from experience that these storage systems are not a form of green energy, they store and release all types of generated energy and are known to be far less than 100% efficient. Chilworth Parish Council also notes that when considering the NPPF and Planning Practice Guidance which provides detail on the proposed approach to renewable and low carbon technologies, that Test Valley Council will give recognition, amongst other things, the consideration to identifying suitable areas for such technologies. It is the Parish Council's requirement that suitable areas must never include the use of areas designated as countryside and not under any circumstances involve areas designated as being part of a local gap.

Protect and Enhance the Landscape Character of the Borough

The Parish of Chilworth, as with much of the Borough of Test Valley is predominantly rural, and without doubt, adds to the rich variety of landscapes, topography and settlements within the Borough. Its position is close to the New Forest National Park with woodland that is similar in nature to the Park. The setting of Chilworth as part of these nationally important landscapes needs to be taken account of when assessing proposals for development outside of these designated areas. Proposals that will result in an adverse impact on the National Landscape or National Park and their settings, taking into account any mitigation proposed, must not be supported as such would be opposed by Chilworth Parish Council. It is also imperative that similar considerations must be taken into account when proposals are likely to have an impact on the special character of Chilworth Old Village.

Local Gaps

Chilworth Parish Council has a long history in protecting and resisting development in our identified local gap designation through our Local Plan. It is of benefit that it is well established in Test Valley Borough and have been supported by our local community for many years. The Chilworth local Gaps designations have always helped guide the direction of growth and identify areas of countryside which are strategically important in defining settlement edges and settings, and in maintaining separation between them. Our local gaps have also been successful in implementation through planning appeals. We are appreciative of being only one of nine local gaps in the Borough. The Local Gaps Study (Stephenson Halliday, 2023) which reviewed the local gaps identified in the adopted Local Plan 2016 (through **Policy E3**) and policy approach identifies that Chilworth has, with North Baddesley, Valley Park, and the larger urban areas of Southampton and Eastleigh, a characteristic separation provided by the areas of countryside between and around them. The Study recognises that our Local Gaps also offer potential green infrastructure opportunities and may provide for wildlife corridors, whilst also offering health and wellbeing benefits for communities and access to green spaces and the countryside.

Chilworth Parish Council highlights that the policy also recognises that development on the edge of settlements will reduce the physical extent of the defined gaps and that development within the gaps could reduce the visual separation of settlements. Chilworth Parish Council requires Test Valley Borough to take into account the individual effects of a proposal and its cumulative effects with other existing and proposed development within the gaps. It is accepted that in such cases, proposals will be considered on their individual merits, however there must be strong reasons for a decision which would irreparably reduce the visual separation of settlements.

Under Policy ENV4: Local Gaps Development within Local Gaps will be permitted provided that:

- a) it would not diminish the physical separation and/or visual separation; and
- b) it would not individually or cumulatively with other existing or proposed development compromise the integrity of the gap.

Chilworth Parish Council goes as far as demanding that this policy is strictly adhered to and that it is in the most extenuating circumstances, which cannot be avoided, would permit any form of development within our local gaps. This is especially relevant to the proposed lithium battery BESS and the Valmore Farm development proposal.

Biodiversity Net Gain

By its very nature of being a countryside parish the Parish Council is very aware of the Environment Act 2021 which introduces the 10% mandatory requirement for biodiversity net gain in conjunction with certain development. We appreciate the biodiversity net gain (BNG) is the achievement of measurable gains for biodiversity through new development and occurs when a development leaves biodiversity in a better state than before development. This very importantly is over and above the consideration of potential effects on habitats and species of importance. The NPPF also set out that Local Plans should pursue opportunities for securing measurable net gains for biodiversity. To this end, Chilworth Parish Council requires careful consideration to be given to its opposition to the existing large development proposals such as the Lithium Battery BESS and its closeness to a Site of Importance for Nature Conservation (SINCs), and the considered disproportional development at Velmore Farm, where the biodiversity net gain would be difficult to achieve along. This is in addition to those arrangements needed for its presence within the impact zone for the New Forest Special Protection Area (SPA) and the need to provide appropriate mitigation including Suitable Alternative Natural Greenspace (SANG) as well as being a new development within 5.6km of the Solent SPA designations, including the Solent and Southampton Water SPA.

Trees and Hedgerows

The Parish of Chilworth benefits from many diverse types of designations related to aged, veteran, ancient and high amenity trees, including some ancient woodland and a large amount of semi-ancient natural woodland. The Parish Council agrees with the Test Valley Borough Council policy to increase tree cover throughout the Borough, through the planting of new street and other trees. The Parish Council will therefore continue to require new and appropriate tree planting, wherever possible and appropriate, with new development. This planting must be of appropriate species, density and size for the special character of Chilworth.

Chilworth Parish Council, with its arboreal officer, are very mindful to oppose any development that results in the loss or deterioration of ancient woodland, ancient semi-natural woodland and ancient or veteran trees, even in the case of exceptional reasons,

and despite any agreed and suitable compensation strategy. Chilworth Parish Council wishes for the careful considerations to be given by Test Valley Borough even if the public benefit would appear to outweigh the loss or deterioration of such trees.

Existing Open Spaces

Chilworth Parish enjoys its many open spaces, including the village green, the community centre land and open farmland, we are keen to ensure the continuing use of these assets. Our open spaces have a significant role within Chilworth as well as the nearby local areas. It is the Parish Council's intention to oppose any loss of our open spaces, especially as it would have the potential to have a detrimental impact on the local community. Our existing open spaces contribute to the network of Green Infrastructure which has benefits for the health and wellbeing of the community. Chilworth Parish Council will always oppose any reduction of our open spaces, points in question are the proposed developments of the Lithium Battery Storage Facility BESS and Velmore Farm.

Access to the Countryside

The parish of Chilworth is set within the countryside and the Parish Council is determined to ensure that those areas marked as countryside remain as previously detailed. Our intention is to enable full access to the countryside and local green spaces through the network of paths and Public Rights of Way (PRoW). These are especially important when they are close to other settlements such as Eastleigh and Southampton and have significant relationship to access to the forest areas close to these parish boundaries. We intend to maintain the benefits which provide those opportunities for recreation and exercise as part of an active lifestyle which contributes to good physical and mental health. This also enables an appreciation of the countryside and the natural environment.

The PRoW network within Chilworth includes National Cycle Routes and Bridleways which enable a variety of modes of additional travel for walking, cycling, equestrian uses and in some cases other non-motorized vehicles. While some routes are dedicated for a single set of users such as footpaths for walking, many routes are designated for multiple users. The PRoW network in Chilworth includes important historic, ecological and landscape environments such as Chilworth Old Village, Chilworth Manor and its surrounding nature reserve, bronze age settlements/rings and the beacon mound known as The Clump.

Chilworth Parish Council requires Test Valley Council (and Hampshire County Council) to ensure the continuing use and care for all the countryside access which currently exists within the parish. This is exceptionally important where settlements expand, such as the proposed considerations for the development of Velmore Farm where existing PRoWs are already most important and in the extensively used entrances to Lordswood. Chilworth Parish Council supports the idea that the network of PRoW must be secured and evolve, with close attention paid to the network on the edges of settlements increases. This is particularly important for circular, family friendly and accessible trails and cycling routes,

investment must be allocated to enhance and maintain these routes in order to meet the needs of the many multiple users.

Residential Areas of Special Character (Policy DES3)

Chilworth Parish Council applauds Test Valley Council's identification of Chilworth as a Residential Area of Special Character (RASC) in Test Valley. It is correct to formalise our defined area as having a distinct character, townscape and landscape which contribute to our special character and quality. This area policy designation (**Policy DES3**) is most definitely supported by the community, as well as in supplementary planning documents and as shown by the parish council at planning appeals.

For Chilworth, the distinguishing features of our area of special character include the very recognisable pattern of development, in that most dwellings are credited with larger than average plot sizes, mature gardens resulting in the parish having much lower densities. Buildings in the RASC area are typically of a variety of large architectural style and character, with mature trees, hedges and distinctive boundary features such as gated entrances.

Chilworth Old Village is the most significant of the RASC and incorporates clusters of buildings which by age and design include many homes that are long standing, thatched and compliment the 18th century church of St Denys, in short it is a heritage asset which is well respected and protected by its residents and those of the local area.

It is therefore the intention of Chilworth Parish Council, and the parish as a whole, to retain this Residential Area of Special Character (RASC) and retain its comprehensive policies to safeguard its character. The Parish Council does not seek to prevent development within the RASC but aims, in line with the policy, to retain and preserve the distinct architectural, spatial and landscape character of the identified areas and supports development that retains and sustains this distinctive local character.

Chilworth Parish Council is ever mindful concerning proposals that involve the subdivision of plots, the demolition, replacement, extension or division of existing buildings, the development of new buildings and structures, or new frontages and boundary treatments which may have the potential to harm aspects that contribute to the special and distinctive character of the RASC.

Chilworth Parish Council requires the details set out in section 5.339 retained in that:

Under Criterion a)

It is pertinent to all proposals that impact the size, use, spatial character and landscape of existing plots and gardens. Where subdivision is proposed, the resulting size and character of the proposed plot, and that of the remainder of the original plot following subdivision, should not be significantly smaller than those within the immediate character area.

Under Criterion b)

It is essential that requirements relating to the size, scale, layout, type, siting, and detailed design of proposed development does not harm the special character of the Chilworth RASC, with regard to landscape, buildings, street scene, trees, boundary treatment, spatial character and views.

These criteria very importantly also include extensions, alterations, conversions, subdivisions and redevelopment.

Administration

Chilworth Parish Council are grateful for your consideration to value and deliberate the comments associated with the Test Valley Local Plan 2040, Regulation 18 - Stage 2 Consultation.

For any associated questions or requirements for clarity please forward your requests to The Clerk to Chilworth Parish Council, [REDACTED] .

Kind Regards

Chris

Councillor Chris Patey
Chilworth Parish Council

[REDACTED]
Mobile: [REDACTED]