

Comments on Local Plan 2040 - Regulation 18, Stage 2

Land at Velmore Farm, Valley Park, Sections 4.187 - 4.200

The Local Plan is a wordy summary of Appendix IV Housing Site Appraisals, Final V1. It is not clear when these site appraisals were carried out but they are stated to have been performed in accordance with the Scoping Report (2020) with “Updates ... for clarity and to provide a more focused appraisal of climate change, transport, accessibility, communities and health topics.” What this means is not clear as the appraisals seem to be based on biased opinions rather than quantifiable assessments of these topics. The Local Plan has significant inconsistencies with regard to the proposed number of houses to be developed at Velmore Farm to the point where it casts doubt on the reliability of the positive conclusions drawn in the Local Plan. The site appraisals should be repeated to reflect the changes in the proposed development and their effect on the existing local community and the Local Plan revised accordingly with all unquantified opinion based conclusions removed.

The following commentary refers to the specific paragraph numbers in the Local Plan:

4.187 If the unspecified “key facilities” to the north, east, and south east of the Velmore Farm site are health facilities, schools, sports, shops, and green areas then they already significantly oversubscribed. More housing will benefit no one. The claim that Velmore farm is within “a 15 minute cycling distance” is bizarre; it is a 20-30 minute ride on busy roads or on pathways shared with pedestrians, dog walkers, and mothers with prams. Only the most hardened triathlete is going to cycle to Eastleigh station from Velmore Farm; most people will use their cars. This whole paragraph smacks of confirmation bias.

4.188 The Local Plan states that there is provision for 1070 dwellings. However, the site assessment was based on 850 houses. The viability of the site should be reassessed for 1070 dwellings. The claim that the site is “sustainable” is not justified – it is no more sustainable than anywhere else. The paragraph states that there is “potential for provision of community hub/local centre and employment uses up to 1.5 hectares”. Is this still true now that the number of dwellings has been increased? If the “deliverability of this proposed local centre is [still] being considered” why mention it at all? It may come to nothing and so should not be put forward as a positive reason to select the site. Confirmation bias again, the authors are trying to present the site as more attractive than it is. (The site is 67 hectares in total; 1.5 hectares is a very small percentage of it.)

4.189 It is stated that the site would require a “1.5 form entry (FE) primary school”. This is good but what about secondary education? Can the existing schools cope with the additional pupils? The paragraph once again refers to “community centres” and “facilities” which need to be provided, the viability of which are not proven. This is a reason to not favour this site.

4.191 It is good that the development will “integrate with existing pedestrian, cycleways and public transport connections” but, however frequent the bus services to Romsey and Eastleigh are, only a small percentage of people will use them. Most people will use their cars. Another 1070 homes could result in at least another 2000 cars on the local roads plus all the attendant delivery vans and tradesman's lorries. Parking is already a massive problem in the local shopping and health centres.

4.194 What is the point of a local gap if it can be reduced at any time? The local gap, having been established for good reasons, should remain.

4.196 “The south east part of the site falls within the 5.6km buffer of the Solent Special Protection Areas...Appropriate mitigation will be required in accordance with the Solent Recreation Mitigation

Strategy”. What is this appropriate mitigation and is it viable? If the site is developed and the requirements are not met it could be too late or too expensive to introduce these measures. The measures should be quantified and fully costed before any site selection is made.

4.197 Has the viability of the measures to process the wastewater from the site been fully assessed and costed?

4.198 The impact of the development on the course of the former Roman road should be assessed before any plans are accepted. The rather woolly notion that the historic site will be “retained as a feature of the layout and design” is not acceptable – once it is damaged it is gone for good.

4.199 Flooding is a significant issue. To say there is a small area at risk of surface water flooding is disingenuous. Templars Way already floods when there is any heavy rainfall. The effect on the existing residents of the run off from all the additional hard surfaces in the new development could be significant and should be assessed.

4.200 The National Grid overhead powerlines running through the estate will affect the potential saleability of the houses in the development reducing the profit margin for the developers and consequently the desire on their part to provide additional community facilities.

Comments on Appendix IV, Housing Site Appraisals, Final V1

There is no scientific basis for the Site Appraisal (SA) scoring matrix: it appears to rely entirely upon the opinion or confirmation bias of the authors. There are many incidences where the performance of the site against the assessment criteria has been scored as Positive or Strongly Positive on the flimsiest and most unsubstantiated of grounds.

The comments below refer to the entries listed for the Velmore Farm site, reference SHELAA No. 82 (2022).

Promoted Housing Capacity – 850

(N.B. The Local Plan refers to a housing capacity of 1070 dwellings. This is greater than the number upon which the site assessment was made. The Local Plan is clearly now referring to a development plan that differs from the one on which the SA was originally performed. This invalidates the SA which should now be revised)

Objective 1 A) Is the site able to address a particular housing need?

The report states again that the development is for 850 dwellings (it is not, it is for 1070) and that “affordable homes would be provided for with self-build, custom build and accommodation for gypsies, travellers and travelling showpeople” also that “specialised housing for older persons” will be provided. These claims can be taken with a pinch of salt now that the number of dwellings has been increased. This objective cannot be said to have been met with a rating of Positive until the final development plan is assessed. A rating of Mixed Performance would be more appropriate.

Objective 2 A) Is the site likely to increase future economic and employment opportunities?

The proposal to provided 5000sqm of commercial floorspace and 250sqm of co-working space along with a convenience store and a primary store has yet to be proven viable. Also the increase to 1070 dwellings demonstrates the desire of the developer to build dwellings rather than property for

employment opportunities. This objective cannot be said to have been fulfilled with an SA score of Positive until the proposal has been verified. A rating of Mixed Performance would fair.

Objective 2 B) Is the site accessible to a strategic employment site by sustainable modes of transport?

The site may well be within 1600m of the Hampshire Corporate Park and the School Lane Industrial Estate via footpaths but is there any evidence that there is a shortage of labour at these locations? Proximity is one thing but if people do not seek employment at these sites and either commute or work from home then it is irrelevant and not a good reason to select this site over another. A rating of Strongly Positive is misleading in this context. A study should be performed to assess the demand for employees at these sites and the likelihood that new residents would seek employment there.

Objective 2 C) Is there connection to high quality broadband?

Another point that has been scored as Strongly Positive which makes the site look good on paper but is irrelevant. By the time the site is developed everyone in the country will be on high quality, probably, fibre broadband. It is not an objective that should be used to prefer this site over any other.

Objective 2 D) Is the site accessible to Andover or Romsey Town Centres?

The site is 7.5km from Romsey town centre and there is an hourly bus service from Templars Way but this is irrelevant as a site selection criterion. An assessment should be made of the number of people who would use the bus compared to those who would drive their car to Romsey. If most people use their cars the presence of a accessible bus route is irrelevant. This criterion does not warrant a score of Strongly Positive.

Objective 3 A) Is the site accessible to early years education provision?

Mulberry Corner Day Care Nursery is 220m from the site. It is an excellent institution but is small and already oversubscribed. The idea that this is a Strongly Positive reason to select Velmore Farm as a preferred development site is outrageous and more evidence of confirmation bias.

Objective 3 B) Is the site accessible to a primary school?

St Francis C of E Primary School is small and oversubscribed. Until plans for a new primary school on the Velmore Farm estate are confirmed the Strongly Positive rating is invalid and misleading. At the present time only a Mixed Performance score can be awarded.

Objective 3 D) Is the site accessible to a convenience store including a local/district/town centre?

The Valley Park local centre is heavily used and has very restricted parking space. The ASDA store is nearby, but very few people would walk to it. New facilities would be needed. The score of Strongly Positive with respect to this objective is optimistic and debatable.

Objective 3 E) Is the site accessible to a primary healthcare facility?

The proximity of St Francis Surgery is cited as a reason for scoring the performance with respect to this objective as Strongly Positive. The site may well be within 800m but the surgery is already

overstretched and has limited parking space – people who are ill are not going to walk to the surgery. The Strongly Positive rating is again evidence of confirmation bias.

Objective 3 F) Is the site accessible to a community facility?

The commentary states that the proposal includes provision for a community hub. However, the proposal has changed from 850 to 1070 dwellings – what else has changed? The viability of a new community hub has not yet been established and until it has a score of Strongly Positive is not warranted. Reliance on the existing Valley Park Community Centre to fulfil this requirement is not adequate. The score should be “Uncertain”

Objective 3 H) Is the site accessible to a bus or rail service?

A Strongly Positive score has been given to the performance on this objective on the basis that the site is within “400m of a bus route or railway station”. To be clear the site is within 400m of a bus route but it is NOT within 400m of a railway station. The score for this objective should be “Mixed Performance”

Objective 3 I) Is the site able to connect to the highway?

Scoring the performance with respect to this objective as Positive because vehicle access will be provided to Templars Way is misleading. Templars Way is not the highway and already carries significant traffic flows at busy times of the day. The site assessment has been carried out on the basis of 850 dwellings, that number has now increased to 1070 with the potential for an extra 2000 cars to be added to the local car population as well as all the attendant delivery and tradespeople’s vehicles for the new estate. Templars Way and Bournemouth road can barely cope now – particularly when Templars Way is flooded after heavy rain. The performance should be rated Mixed Performance at best.

Objective 4 A) Is the site on previously developed land?

The performance has been rated as Mixed Performance because the site has some “previously developed land (less than half)”. But the amount of previously developed land is tiny – 2.5ha out of 67ha – the land is mainly previously undeveloped. The performance should be rated Negative not Mixed Performance.

Objective 6 A) Does the site contain areas at risk of or potential to be susceptible to flooding either now or in the future?

Though rated as Mixed Performance in the site assessment the Government website shows areas of high risk of surface water flooding within the development area. Although building could be restricted within those areas, the run off of water from the new dwellings and hard surfaces within the new development increases the risk of flooding for existing residents in Valley Park by reducing the ability of the land to absorb heavy rainfall. The rating on this objective should be Negative.

Objective 8 A) Would the development affect landscape character and protected landscapes?

The answer to this is “Yes” as is detailed in the site assessment commentary. The score should therefore be Negative not Mixed Performance.

Objective 8 B) Does the site relate well to the existing settlement?

There has already been massive development in Valley Park. It is time to consider other areas.

Objective 10 B) Will the development conserve habitats and species?

The score should be Negative on this objective. The submission claims that the site would obtain a 10% biodiversity net gain. How can a housing development conserve habitats and species and how can biodiversity be enhanced? Who will monitor this and if it is not achieved what action will be taken?

Objective 10 C) Would development conserve and enhance quality local green infrastructure provision?

It is difficult to see how the development of a housing estate can conserve and enhance local green infrastructure. It must surely reduce local green infrastructure. The score should be Negative not Positive.

Objective 11 A) Will the site contribute towards reducing our impact on the climate?

The commentary states: “The site performs well in relation to accessibility considerations given the proximity to existing services and facilities”. These claims have been shown to be false or at best misleading. It also states: “The submission indicates the intention to provide zero carbon ready homes”. Surely any modern house is “zero carbon ready” so this is not a reason to select this development over any other.

Objective 12 A) Is the site accessible to open space?

The commentary states that “There are a number of public open spaces located to the north of the site”. There are, but these were provided by the developers of the existing estates in Valley Park. These provisions are already heavily used; the development of Velmore Farm will mean that these facilities will now be overused. This will be a loss to existing residents. The commentary goes on to say that “It would be expected that additional open space provisions would need to be provided”. As the adequacy of this provision is not clear at the moment, owing to the increase in the number of dwellings, the score of Strongly Positive must be questioned. A score Mixed Performance would be more appropriate.

Commentary/Summary

The scores rated at Positive or Strongly Positive do not seem to be based on any kind of scientific method but rather confirmation bias.

The scheme may provide the “opportunity to deliver key community facilities” but there is no proof that it will actually do so.

The site assessment is based on 850 houses when the Local Plan now assumes 1070. The SA should be revised in line with the latest development proposal.

The site is located within a local gap so it reduces the local gap – it does not “maintain the integrity of the gap”.

The site is affected by local surface water flooding and will increase the likelihood of flooding in the existing Valley Park area.

Parts of the site are designated as SINC's. The development will be to the detriment of these areas.

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