

# 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 6<sup>th</sup> February to noon on Tuesday 2<sup>nd</sup> 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](http://www.testvalley.gov.uk/localplan2040)

Once the form has been completed, please send to [planningpolicy@testvalley.gov.uk](mailto:planningpolicy@testvalley.gov.uk) below by **noon on Tuesday 2<sup>nd</sup> 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

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## 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:

Orchard(Highwood Lane )Ltd
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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.

<b>General</b>

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
	<p><b>Sustainability Appraisal and site selection Process Objection</b></p> <p><b>See separate e-mail for detailed comments</b></p>
<b>Policy S1</b>	<p><b>Support</b></p> <p><b>See separate e-mail for detailed comments</b></p>
<b>Policy SS6</b>	<p><b>Objection</b></p> <p><b>See separate e-mail for detailed comments</b></p>
<b>Policy SA4</b>	<p><b>Objection</b></p> <p><b>See separate e-mail for detailed comments</b></p>
<b>SA6</b>	<p><b>Objection</b></p> <p><b>See separate e-mail for detailed comments</b></p>
<b>Policy ENV4</b>	<p><b>Objection</b></p> <p><b>See separate e-mail for detailed comments</b></p>

## 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 PART2,SUBMISSION ON BEHALF  
OF ORCHARD (HIGHWOOD LANE) LTD

LAND SOUTH OF HIGHWOOD LANE, ROMSEY

SUSTAINABILITY APPRAISAL

POLICY SS1 SETTLEMENT HIERARCHY

POLICY SS6 MEETING THE HOUSING REQUIREMENT

POLICY SA4 LAND AT GANGER FARM

POLICY SA6 LAND AT VELMORE FARM

POLICY ENV4 LOCAL GAPS

March 2024

## Summary

### Sustainability Appraisal

- Objection. There is a lack of consistency in the application of the Sustainability Appraisal methodology
- Objection. The Sustainability Appraisal has incorrectly assessed the impact of development of the land south of Highwood Lane. SHELAA site 370
- Objection. The Sustainability Appraisal for the land south of Highwood Lane should be revisited and updated with the information submitted with this submission and its performance against the criteria re-assessed
- The selection process 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. Romsey is placed in Tier 1 where the scale of development acceptable in principle includes strategic housing allocations.

### Housing Distribution

- Policy SS6 Meeting the Housing Requirement. Objection The limiting of development at Romsey to existing commitments and two proposed housing allocations, has not been justified.
- Policy SS6 Meeting the Housing Requirement. Objection. The Plan should be amended to include land south of Highwood Lane for housing. See plan attached.
- Policy SA4 Land at Ganger Farm. Objection. The proposed allocation is in a less sustainable location than the land south of Halterworth lane.
- Policy SA6 Land at Velmore Farm. Objection. The proposed allocation is in a less sustainable location than land at Romsey.
- Policy ENV4 Local Gaps. Objection. The western boundary of the Romsey-North Baddesley Local Gap should be redrawn to follow Highwood Lane from Stroud School to its junction with Botley Rd

## Introduction

1. This submission is made on behalf of Orchard (Highwood Lane) Ltd. It sets out its response to the Regulation 18 Part 2 Consultation on the Test Valley Local Plan published on the 6<sup>th</sup> February 2024.

## **Background**

2. The site has little recent planning history. There was an application for residential development on part of the site which was dismissed at appeal in 2011. However, the circumstances have changed significantly and the appeal decision is of limited relevance to the consideration of the current requirement to allocate land for housing. The site has been the subject of a submission for inclusion in the Council's Strategic Housing and Employment Land Availability Assessment (SHELAA). Site ref 370.

## **Sustainability Appraisal(SA) 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 local plan being prepared. In preparing a SA there are a number of requirements which should be satisfied including: identifying reasonable alternatives and explaining why chosen a preferred option 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, that 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. 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 being relied upon.

5. A SA is intended to inform the decision-making process the outcome of which would be the delivery of sustainable development. It is not a precise process and involves a considerable amount of subjective judgement. However, if it is to perform its intended role, the judgements made and the outcome of the SA, need to be based on accurate information and the subjective assessments, ones which can be reasonably attributed to the base information. Where that is not the case the value of the SA and the decisions based upon it are significantly diminished. For the reasons set out below the site assessment for land south of Highwood Lane is considered to be flawed.

## **Objective 1A**

6. Commentary. The SHELAA submission referred to the potential for the inclusion of self-build and custom-build plots but this is not reflected in the performance of 'no effect'. The commentary refers to the site not being actively promoted as a self-build site. This is not part



of the assessment criteria ref the Site Assessment Framework methodology. The commentary should be reviewed to reflect the SHELAA submission.

7. Policy HOU7 Self-Build and Custom Build Housing proposes a percentage of homes to be provided as self-build and custom build. Sites above the threshold should all have the same 'score'

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

Objective 2A)

8. Commentary. The SHELAA submission did not include employment uses but it is close to a range of employment sites at Romsey including the existing at Abbey Park and the proposed employment allocations ref Policies SA9 and SA10. That position should be reflected in the commentary.

The commentary should be revised

Objective 2B)

9. Commentary. The site is considered to be within 1.2km of the Abbey Park Industrial Estate

The commentary should be reviewed.

Objective 2D)

10. Commentary. The site is within 400m of a bus stop, on the A3057 Winchester Road which provides a frequent bus service to Romsey and Winchester. The bus service is the same one referred to in the site assessment for Ganger Farm South. That site is given a double positive 'score'. Highwood lane South should receive the same 'score'.

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

Objective 3A)

11. Commentary. The site is approximately 500m from the Pre- School on Halterworth Lane.

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

Objective 3B)

12. Commentary. The distance to Halterworth Primary School is approximately 500m. The commentary should be reviewed to more accurately record the accessibility of the site to the nearest primary school. The site assessment for Velmore Farm has not been based on the existing position rather it has assumed that a new school would be provided resulting in a more favourable score. The on-site provision reflects the size of the site which results in an unbalanced comparison with sites which fall below the threshold for a new school. The benefits of a development being able to make use of existing school infrastructure rather than

be dependent on new provision at some point in the future should be part of the assessment process.

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

Objective 3C)

13. Commentary. The site is within 1.5km walking distance to the nearest secondary school. Velmore Farm is further away from the secondary school within whose catchment it is located yet it receives a more favourable 'score'.

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

Objective 3D)

14. Commentary. The site is approximately 600m from the convenience store on Saxon Way.

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

Objective 3E)

15. Commentary. The site is over 1.6km from a health facility as is the case with Ganger Farm South. However, the 'score' for that site is more favourable as a result of taking into account the availability of a regular bus service. The availability of a bus service is not included within the methodology. If it is to be a factor then as the same service is within 400m of the Highwood Lane site then it should have the same 'score'.

The commentary should be reviewed and either the Ganger Farm South 'score' being assessed on the basis of the SAF or Highwood Lane South 'score' should be revised.

Objective 3F)

16. Commentary. The site is approximately 750m from the Montfort Community Hall, the nearest community facility. The site assessment for Velmore Farm has not been based on the existing position rather it has assumed that a new community facility would be provided resulting in a more favourable 'score'. The distance from Velmore Farm to an existing facility is relatively similar to that for the land at Halterworth. The SA methodology should be applied consistently and be based on the relationship of sites to existing facilities.

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

Objective 3H)

17. Commentary. The site is approximately 400m from a regular bus service on Winchester Road in addition to the less frequent service on Halterworth Lane.

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

Objective 3I)

18. Commentary. Potential access constraints are recorded without any explanation of what they are. The site has direct access to the highway network. The impact of development on the highway network would need to be considered in detail as with any potential site. The criteria have not been applied consistently. Ganger Farm South is assessed more favourably although access is via an un-adopted highway which the Highway Authority had expressed concerns regarding its suitability. See HCC response of 27<sup>th</sup> July 2023. Velmore Farm also is assessed more favourably than land at Halterworth even though the position is the same i.e. the site has access to the highway.

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

Objective 6A)

19. Commentary. The whole site in flood zone 1 and is at low/no risk of surface water flooding and groundwater flooding.

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

Objective 7

20. Commentary. The site for 400 dwellings is given an uncertain 'score, compared with a no effect score for Ganger Farm South. Given the similar scale of development and location on the edge of Romsey one would have expected a very similar commentary and the same score. A significant proportion of the vehicle movements from Ganger Farm will travel west and south through Romsey, this is not reflected in the commentary. It is not clear why they have been assessed differently.

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

Objective 8B)

21. Commentary. The commentary does not fairly reflect the relationship of the site with Romsey. The western boundary of the site adjoins the existing development at Halterworth, the northern boundary adjoins the cluster of houses and Stroud School on Highwood Lane. To the east there are some properties along Highwood Lane.

The commentary should be revised

Objective 8C)

22. Commentary. The assessment is that development could have an impact on the local gap. The Local Gaps Study commissioned by TVBC and the recommendations made in relation the

site suggest that the separation of Romsey and North Baddesley could be maintained with a revised boundary along Highwood Lane.

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

Objective 10B)

23. Commentary. The site has the potential to conserve the existing ecological interest and provide the required net gain. The lack of elements of the local ecological network on which to build improvements should not been seen a negative factor, rather it could be regarded positively in the context of not creating potential harm. The assessment of Ganger Farm is more favourable despite the presence of areas of ecological interest including Ancient Woodland and a SINC.

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

Objective 10C)

24. Commentary. The local plan includes Policy BIO4 which seeks to enhance existing provision or create new opportunities for green Infrastructure. It would be reasonable to assess sites in that context which would result in a consistent approach and a more positive 'score'

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

Objective 11

25. Commentary. The assessment is arrived at by bringing together those of other criteria, in effect a subjective judgement of a number of other such judgements. The value of such an approach is questionable. The negative 'score' is based on the site performing negatively in the majority of cases i.e. objectives 3,4,5,6 and 10. A review of the site SA suggests that is not the case and when the SA is reviewed it is likely that a different conclusion would be arrived at.

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

Commentary/Summary

26. The commentary/summary concluded that the site is in a sustainable location with reasonable accessibility to essential services and amenities and is relatively unconstrained. The reason for its non-allocation is that there are better sites available in terms of accessibility to services and facilities and are better related to the settlement of Romsey. For the reasons set out above that conclusion is not founded on a sound assessment and comparison of the merits of the site.

## **Site Selection**

27. The approach taken by TVBC to arrive at a preferred option for meeting the housing requirement is set out in paragraphs 3.8-3.11 of the Regulation 18 Stage 2 local plan. The six broad distribution options identified in the Regulation Part 1 consultation were revisited applying a top down and bottom up approach. The top down approach covered strategic factors and the bottom up process included the assessment of the merits of individual site options in delivering the top down factors. The outcome of the process was to confirm the proposed spatial strategy outlines in the option Regulation 18 Part 1 consultation remained the preferred approach.

28. That spatial strategy comprised a focus on supporting regeneration of Andover and Romsey town centres, supporting growth at key employment areas along with supporting growth at larger urban and rural communities throughout the Borough ref para 3.11 of the Regulation 18 Part 2 Local Plan.

29. The preferred spatial strategy provides the context for the site selection process which followed the SA. At the conclusion of stage 5 the land south of Highwood Lane was one of the sites taken forward for further consideration.

30. Following stage 5 a preferred pool of sites was identified ref paragraph 5.70, Table 3 and Figure 6 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 land south of Highwood Lane which made it to stage 5 was not included? There is no explanation why land which had very similar site assessments were included.

31. 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 overall process rather than the actual process which to selection of the preferred pool of sites.

32. 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 the land south of Highwood Lane and the creation of the two-tier category of constants and variables for which there is no published methodology.

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

34. The analysis of the 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.

35. 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.

36. The assessment of growth options and reasonable alternatives is further constrained by the assumption that there is an issue with the scale of development which can be accommodated at Romsey. Paragraph 7.4 of the ISAR refers to less pressure on the infrastructure capacity of Romsey as a reason why growth scenario 1 is the preferred option.

37. There is no clear justification as to why Romsey can only accommodate the scale of development proposed in the plan in addition to existing commitments. There is no evidence in the ISAR or in the supporting published material which supports TVBC's assertion that there is an issue of capacity with Romsey's existing infrastructure being unable to support development over and above that proposed in the local plan or that further investment via development contributions would not address any specific issues.

38. Another reason given in paragraph 7.4 for the selection of growth option 1 is that it achieves more proportionate growth and infrastructure improvements across the main southern settlements.

39. There does not appear to be any evidence or discussion of what would comprise a balanced distribution which would best meet the housing needs of STV and how each scenario performs. There is one Tier 1 settlement (Romsey) and four Tier 2 settlements (Chilworth, North Baddesley, Nursling and Rownhams and Valley Park). Housing is proposed in the form of site allocations only at Romsey and Valley Park, none at Chilworth and North Baddesley and a possible small allocation at Nursling. It is difficult to understand how the proposed housing allocations achieves a balanced distribution.

40. There is also no analysis of what infrastructure improvements are needed in the south of the borough and how those needs compare with what could be delivered via the preferred growth option.

## **Conclusion**

41. The SA and the process of site selection on which Policy SS6 does not form a sound basis for the justification for the proposed allocations. The methodology is unclear and both should be reviewed.

## **Policy SS1 Settlement Hierarchy**

42. The proposed settlement hierarchy is the cornerstone of TVBC's approach to delivering its spatial strategy and sustainable development. Romsey is placed in Tier 1 where the scale of development acceptable in principle includes strategic housing allocations, ref Spatial Strategy Policy1 (SS1) Settlement Hierarchy. Locating development at Romsey is supported.

## **Housing Distribution**

### **Policy SS6 Meeting the Housing Requirement**

43. The SA and site selection process has resulted in the non-allocation of land south of Highwood Lane a site adjoining a Tier 1 settlement with no over-riding constraints. The principle reason for its non-allocation is the preference for Ganger Farm and having made that decision TVBC have applied a capacity constraint to justify no further allocations.

44. The site at Highwood Lane is capable of delivering sustainable development at a Tier 1 settlement and is preferable to Ganger Farm

### **Conclusion**

45. Development of land at Highwood Lane South would be consistent with the Test Valley Sustainable Spatial Strategy of focussing development at Tier 1 and Tier 2 settlements.

46. The Local Plan should be amended to include land south of Highwood Lane for housing. See plan attached.

### **Policy SA4 Land at Ganger Farm. Objection**

47. Objection. The proposed allocation is in a less sustainable location then the land south of Halterworth Lane. The criteria of the SA have not been applied consistently the result of which is that the site appears to perform better when compared with other sites, e.g. criteria 10B) has a mixed score but elsewhere a site with similar characteristics receives a strongly negative score and similarly 10D) has a negative score but elsewhere a strongly negative score is given.

48. The site SA has assumed access via Ganger Farm Lane, yet the current planning application shows a vehicle access to Jermyns Lane which the Highway Authority has expressed concerns.

49. The site is located on the north-east edge of Romsey which would mean traffic heading to the town centre, south or west would use the Winchester Road and Southampton Road experience congestion at peak times. The assessment that there are no air quality issues which is surprising and needs to be justified.

50. There is no justification why the site is placed in the 'constant' category and is included within all the growth scenarios and why other sites of very similar/same merits in terms of the spatial strategy are excluded. When comparisons are made ref paragraph 5.99 they are done so with sites similar in scale, and in respect of Romsey are ruled out because of the implied capacity constraint.

### **Policy SA6 Land at Velmore Farm. Objection**

51. The proposed allocation is in a less sustainable location than land at Romsey. The selection of the site is based on a site assessment which has not been the subject of the consistent application of the methodology. It has taken into account a submitted master plan rather than

the existing position which has resulted in it having a more favourable assessment than sites where a masterplan has not been submitted.

52. There is no site assessment for the land at Halterworth which comprises four individual submissions. When such an assessment is undertaken and is on the basis of the relationship with existing facilities it performs much better than the land at Velmore Farm.

53. The assessment in attributing mixed 'score' regarding impact on the landscape and a negative score on the impact on the local gap does not fully reflect the Landscape Sensitivity Study or the Local Gap Study. A strongly negative 'score' would be a more accurate recording of the impact in respect of both criteria.

The consultants advised that

‘Considering the above discussion of landscape value and landscape susceptibility, this is a landscape of **High** overall sensitivity. This is by virtue of the elevated character of the open landscapes which define the western, north-western, south-western and central parts of the site, together with the experience of relative remoteness and sense of place provided by landscape pattern (including the presence of the Roman Road) ref paragraph 1.1.516

54. With regard to the Southampton-Eastleigh Local Gap the consultants conclude that:

‘By virtue of its historic function as planned and managed landed estate (and associated legacy features of this) and the scale and density of the forestry and estate woodland, the Local Gap has a valuable strategic function in defining setting and individual identity of adjacent settlements.’ ref page 58.

55. In proposing development at Velmore Farm TVBC have relied upon it providing a more balanced distribution of development in the south of the Borough. There is no explanation of how and why how the allocation of the site for over 1000 homes achieves a balance of provision across southern Test Valley or what criteria were used to arrive at that judgement.

56. There is also no clear justification why an extension to Eastleigh within Test Valley should be singled out as an issue to be considered when assessing the merits of sites. Having identified that it is a factor which has led to the proposed allocation of Velmore Farm there is no analysis of the impact of the development on the urban area of Eastleigh or what benefits it would bring such that they overcome the short comings of the site in terms of the SA objectives. In terms of comparing sites those which are not close to the urban area of Eastleigh would be assessed less favourably.

#### **Policy ENV4 Local Gaps**

57. The policy proposes a local gap between Romsey and North Baddeley the boundary of the gap is shown in Inset Map 3. It includes the land between Halterworth Lane and Highwood Lane.



58. 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.

59. They concluded that the strategic importance of the gap has been eroded by development of the Abbey Park Industrial Estate and solar farm and that its contribution to settlement identity has been weakened by development within it.

60. One of the key elements of Policy ENV4 is to maintain the physical and, or visual separation of settlements. The consultants advised that the intervisibility between the two settlements was limited by the existing landscape features on the settlement edges and the tree and hedgerow lined A27. In considering what defensible boundary features there were within the current gap the consultants highlighted the 'tree lined Highwood Lane'.

61. The development of land south of Highwood Lane whilst extending the built-up area boundary of Romsey would still mean that in this location it would remain west of the existing boundary of the Abbey Park Industrial Estate and the proposed extension as set in the local plan.

62. The consultant's recommendation was 'Consideration could be given to amending the Local Gap boundary in the west of this gap, where the existing settlement edge has eroded the rural character. Highwood Lane creates a natural boundary within the gap, by virtue of its mature tree/wooded character. Amending this part of the Local Gap would not undermine the strategic intent or purpose underpinning it, as the inter-layered field boundary hedgerow vegetation at and beyond Highwood Lane helps reinforce the perceptual qualities of the gap.' The existing landscape features on Highwood Lane can be enhanced with additional boundary planting further limiting any views of the site from the A27.

63. The analysis of the gap and the recommendations are supported. The development of land south of Highwood Lane would still mean that the edge of Romsey in this location would remain west of the existing boundary of the Abbey Park Industrial Estate and the proposed extension as set in the local plan. The existing landscape features on Highwood Lane can be enhanced with additional boundary planting further limiting any views of the site from the A27.

**Conclusion:**

64. The local gap boundary between Romsey and North Baddesley should be revised to exclude the land between Halterworth Lane and Highwood Lane.

65. The Plan should be amended to include land north of Highwood Lane for housing.