# 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

Once the form has been completed, please send to 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

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

Tel: 01264 368000

Website: <a href="www.testvalley.gov.uk/localplan2040">www.testvalley.gov.uk/localplan2040</a> Email: planningpolicy@testvalley.gov.uk



## Part A: Your Details

Title\*

Please fill in all boxes marked with an \*

Mr

Mr/Mrs/Miss/Ms (please state)	/Dr/Other	1411	Name*	Carour
Surname*		Williams		
Organisation* (If responding on behalf of an organisation)				
Please provide y	our email a	address below:		
Email Address*				
Alternatively, if yo	ou don't ha	ve an email address ple	ase provid	e your postal address.
Address*				
		F	Postcode	
•	-	onding on behalf of ano are representing:	ther party,	please give the name/

First

Gareth

## **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

## http://www.testvallev.gov.uk/aboutvourcouncil/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

I wish to object to the Test Valley Draft Local Plan 2040 specifically concerning the development of Velmore Farm, off Templars Way.

Historically, Test Valley has favoured large developments onto the larger settlements and towns, notwithstanding that focussing development onto existing urban areas increases urbanisation and brings a disproportionate effect on the local residents through loss of green space, loss of biodiversity, loss of wildlife corridors, increased Nitrogen run-off (Aecom Report, pg 48) to the Solent Basin, increased traffic, increased pollution and greater demands on critical infrastructure and support services.

The seemingly deliberate policy of avoiding smaller developments throughout the Borough could be regarded as disadvantaging the rural economy within the Valley which TVBC have stated elsewhere is struggling and needs greater support through housing and employment, but this is often seen as the elitist protection of certain villages and parishes, such as Stockbridge, which has not received any allocation.

This proposal has not critically examined the impact of such a development on the residents of Test Valley and has ignored extant policies.

Whilst acknowledging that the Stephenson Halliday December 2023 Local Gaps Assessment suggests that the distinction between the wooded areas and the agricultural area withing the Southampton – Eastleigh Gap could allow development to the latter, the report also states (p.61) that "...By virtue of its historic function ... the Local Gap has a valuable strategic function in defining setting and individual identity of adjacent settlements".

The development on Velmore Farm would harm the local character and integrity of the Strategic Gap and associated physical and visual separation afforded by the Gap, not least because of the difference in elevation, which is c.18 metres, any multistorey development would be visible in Chilworth, but also the loss of valuable biodiversity and wildlife corridors. It would be an error to consider that the loss of arable land would have a minimal effect on biodisversity (see Aecom Report)

The Aecom Report notes (pg.28) that the development would have a significant impact on Nutrient Neutrality, Air Quality, Water quality and quantity. It also states (p.38) that these risks and likely significant effects "... cannot be dismissed..." and would have the largest deleterious impact on nitrogen and phosphorous levels polluting the River Test and basin. The report also notes the impact of the development on the hydrology; the area is already highly susceptible to ground water flooding and a development on the higher elevations on Velmore Farm will exacerbate this.

Traffic and the associated increase in pollution levels would be significant. A traffic management plan has been referred to in various reports but has not been published by TVBC in the Supporting Documents bundle. This needs to be addressed as it is a key consideration. However, it is understood that this report has not taken into consideration the impact of the 1,000+ development by Eastleigh at North Stoneham Park, which is less than 1½ miles from Velmore Farm and which has delivered a significant increase in local traffic congestion and pressure on existing infrastructure and services particularly as several of the S.106 obligations have not been delivered.

There is no discussion on the impact of this development on the New Forest SAC/SPA. TVBC would need to agree the approach to mitigation, but no discussion has been published.

This development on the south-western boundary of TVBC solves a political problem for the Council to deliver development land, but the development itself will bring little, if any, economic benefit to TVBC. There are no businesses in the area, so residents would use Chandlers Ford and Eastleigh. The desired employment zone is very modestly sized and would be in competition with more conveniently located employment zones in Eastleigh and Chandlers Ford where 33% of the industrial space is standing idle.

The Velmore Farm development breaches the Southampton-Eastleigh Local Gap and will have a visual impact on Chilworth; there would be a significant loss of biodiversity, a loss of wildlife corridors, increased local traffic, increased pollution and little, if any, economic benefit to the Council.

Valley Park has had development of over 4,000 houses and this will increase the allocation to over 5,000 with no discernible economic benefit, yet mid-Test Valley has seen no development in the same period despite TVBC commenting publicly that the Valley's rural economy requires investment and development. With over 36% of TVBC population living in rural areas and one of the worst classifications of household depravation in the South-East, the focus should be towards allocations that contribute towards TVBCs stated aim of improving the rural economy.

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

#### 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.