

Objection to the Regulation 18 Draft Test Valley Local Plan Review 2042 on Behalf of Amport Parish Council in Relation to the Proposed Allocation of 1034 Dwellings on Land at Weyhill, Policy NA16

Bluestone Planning have been commissioned on behalf of Amport Parish Council to submit an objection to Policy Northern Area 16 (NA16): Expansion of Weyhill.

It should be noted that any reference to Weyhill in this document refers to Weyhill within Amport Parish. The area of Weyhill within Penton Grafton Parish is visibly and effectively separate in nature along the parish boundary. The pedestrian connectivity between the two parishes is also lacking and described in more detail below.

This objection relates to a number of different grounds and topic areas as described by the following headings.

Community Consultation

- **Could Test Valley Borough Council (TVBC) respond as to why best practice as set out in the NPPG was not followed with regard to consulting with the Parish Council and Steering Committee in relation to the potential conflict between the submitted Neighbourhood Plan (March 2025) and the emerging Local Plan?**

The Parish Council would like to raise how disappointing it is that Test Valley Borough Council have not sought to engage with the Parish Council and in particular, the Neighbourhood Plan steering committee, prior to the publication of this draft of the Local Plan.

As the Policy team are aware, the Neighbourhood Plan (NP) has been in preparation since designation in February 2022 and officers have had sight of the Pre-Submission Draft Plan at the end of 2024, as well as the Submission Draft since March 2025.

From the initial stages of preparation, the Steering Committee have asked TVBC for a housing figure as set out in the NPPF paragraph 69¹. This was latterly set at 20 dwellings and the entire NP was based around this figure.

At the numerous public consultation events, officers from TVBC confirmed this figure and that no major development was proposed for the area. This was directly questioned when the SHELAA sites were originally published.

¹ <https://www.gov.uk/guidance/national-planning-policy-framework/5-delivering-a-sufficient-supply-of-homes#para69>

Even when it was known after the publication of the NPPF in December 2024, there was no consultation with the community or the NP Steering Committee. At this stage there would have still been time to change the nature and scope of the NP and include details relevant to a potential large-scale development in the area. Instead, time, money and energy has been put into a NP, which if this policy is adopted, will ignore the wishes of the community and their desire to shape development in their area.

The approach by TVBC is contrary to the advice set out in the NPPF²:

“The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination.

The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because [section 38\(5\) of the Planning and Compulsory Purchase Act 2004](#) requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan.”

Delivery Within the Plan Period

Could TVBC respond as to:

- **Why the NA16 sites are considered to be available, achievable and deliverable within the Plan Period given the complex nature of the site assembly, difficulties in a comprehensive masterplan approach, amount of infrastructure required, the level of mitigation needed etc. as set out in detail below?**
- **Why the NA16 sites which were considered in the previous Call for Sites as inappropriate are now considered appropriate for development within the same criteria for assessment?**
- **If they have confirmed the availability of all of the sites with the relevant landowners?**

² Paragraph: 009 Reference ID: 41-009-20190509 <https://www.gov.uk/guidance/neighbourhood-planning-2>

- **If not all of the sites are available, can TVBC confirm whether the site would be considered appropriate with a smaller number, given the extensive nature of infrastructure required in this location?**

It is not envisaged that the sites can be effectively delivered within the Plan Period and is contrary to the NPPF on delivery of strategic matters³.

This is a complex allocation, where not all sites and landowners have confirmed that they are willing to put forward their land for development. It is understood that some of the largest landowners in particular have not agreed. There are 10/11 separate parcels of land together which will make up the proposed allocation sites. These range in size and are not necessarily interconnected.

The NPPF glossary sets out that for a site to be deliverable:

“To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within 5 years”.

With numerous owners, this will lead to land assembly issues and the requirement for an equalisation agreement to ensure that a new primary school and other essential facilities will be provided and costs shared fairly. This takes considerable time to agree and complete the necessary legal paperwork, before any collaboration can effectively begin. It is understood from experience that the greater the number of owners, the longer it will take to agree on such matters.

There would need to be a comprehensive masterplan to pull together the fragmented parcels of land, otherwise there is a risk of piecemeal areas of development which has no relationship with each other element, with the likely risk that essential facilities and infrastructure would not be delivered. A detailed analysis of masterplan issues is included below.

The National Design Guide⁴ sets out the importance of well-designed places and an integrated design process.

Paragraph 14 states:

“At an early stage of the design process, the relative priority for different characteristics may be discussed and agreed. The most relevant characteristics will be determined by a number of considerations:

- *locally identified priorities and concerns;*

³ <https://www.gov.uk/guidance/plan-making#delivery-of-strategic-matters> Paragraph: 059 Reference ID: 61-059-20190315, Paragraph: 060 Reference ID: 61-060-20190315

⁴ https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf

- *the strategic priorities of the local authority;*
- *the priorities of a particular user group;*
- *the scale of proposal;*
- *its site and location; and/or*
- *the design process, including whether it is at a strategic or detailed stage”.*

Paragraph 17 of the Design Guide sets out that:

“Local communities can play a vital role in achieving well-designed places and buildings and making sure there is a relationship between the built environment and quality of life. Communities can be involved in design processes through approaches such as co-design, design workshops and other engagement techniques, so that places and buildings reflect local community preferences, improve their quality of life and fit well into their surroundings. The design-related chapters of the planning practice guidance explain these and other design processes”.

The Local Plan policy makes no mention of the Neighbourhood Plan, which has been with TVBC since March 2025. The detailed Character Appraisal and Design Code work for the NP specifically looks at Weyhill and its priorities and concerns. The Design Code specifically does not cover major development of the nature proposed. This could have been included within the NP, had the Steering Committee been advised. Matters which affect the allocation sites are included in the NP, these have not been taken into account within the Policy, nor have any of the policies within the Plan itself. Further details are included in the section on the NP below.

The lack of community engagement is deeply concerning, particularly when TVBC knew and even attended events within the parish relating to the NP.

There are so many missed opportunities here to involve residents and stakeholders and it is likely that as a result, there will be no integrated masterplan approach which would be supported by the community.

When considering the constraints as highlighted below, the density of development within the developable areas would need to be much higher than the surrounding character of the area as identified in the Neighbourhood Plan Character Appraisal. This would be contrary to the Neighbourhood Plan policies.

Finally, on this topic, the Local Plan highlights that no new settlements are being proposed, effectively however, the Weyhill sites would equate to delivering a new settlement. Delivering such a large-scale development where infrastructure requirements are significant and constraints numerous would raise questions over how much background work has been undertaken to reach this stage.

Spatial Strategy

Could TVBC confirm:

- **How the allocation of the NA16 sites is consistent with the Spatial Strategy given the scale of the development?**
- **What evidence base work has been undertaken to date to support the allocation?**
- **How it is compatible with the findings of the supporting evidence base documents for the Local Plan (including those documents brought forward from the previous Regulation 19 Plan).**
- **How it is consistent with the TVBC Corporate Plan?**

It is understood that there has been a significant change in housing numbers since the introduction of the revised NPPF in December 2024, but the work undertaken to find a suitable location for what is effectively a new settlement is contrary to all of the background work undertaken to date.

The relevant objectives for a spatial strategy have been to:

- *“Focus development on sustainable locations taking account of infrastructure, community facilities and public transport accessibility.*
- *Minimise reliance on private car and maximise alternatives”.*⁵

For the Regulation 18 Stage 1 the preferred strategy at this point considered a hybrid approach combining 3 of the above options including:

1. Focus of growth in Andover and Romsey.
2. Settlement hierarchy led distribution (including growth in the main settlements and rural settlements).
3. Concentrating development at key economic hubs.

It was noted that a new settlement option was considered but discounted when fewer houses were required. What is of interest is that the Spatial Strategy did mention in paragraph 5.12:

“The option of concentrating development primarily at key transport hubs would in practice involve concentrating development both in the main settlements and at one or both of the rural train stations in the district. Concentrating development around the rural train stations would only be sustainable as part of a new settlement”.

⁵ Paragraph 5.9 of Spatial Strategy Topic Paper Draft Local Plan 2040 – Regulation 18 Stage 2 - February 2024

It is considered that this would be a sensible and sustainable approach to housing delivery. Weyhill no longer benefits from a train station and there is no potential to reinstate this, particularly for the number of dwellings proposed. Whilst it is acknowledged that the A342 to the north of Weyhill currently offers a good bus route, this is not accessible and is described in more detail in the sustainability section below.

The Test Valley Borough Council's Corporate Plan⁶, was approved in 2023. It sets out a vision and strategic priorities which are:

- a) **Sustainability** – delivering lasting benefits for our communities.
- b) **Connection** – building upon the identity, strengths and ambitions of our communities.
- c) **Environment** – a greener borough for our communities.
- d) **Inclusion** – working together to create opportunities for our communities.
- e) **Prosperity** – economic growth that impacts positively on our communities.

This is quoted in the Spatial Strategy as being embedded in the Draft Local Plan.

It is not agreed that the Weyhill allocation sites meet these priorities. In response:

- a) As set out in the detailed objection below, the site is not sustainable and contrary to paragraphs 8 and 11⁷, 109 and 110 of the NPPF⁸.
- b) The allocations are not supported by the community. The parish has been undertaking considerable community consultation in relation to its Neighbourhood Plan. It has rejected these sites in favour of a much smaller housing number for the parish and the delivery of a much-needed recreation and play area in Weyhill instead.
- c) It will not result in a 'green borough', instead it will remove a potential Local Green Space and a number of Important Views, which have been consulted upon. In terms of impact on the environment, development in this location would have significant adverse impacts on the Pillhill Brook and in turn the River Test as detailed below.
- d) It would create a larger community which is dependent on the private motor vehicle for everyday needs. As detailed below, it would not be a suitable location for those who cannot afford a car, who have limited mobility, young children or those persons whereby walking long distances or crossing busy

⁶ <https://www.testvalley.gov.uk/aboutyourcouncil/corporate-plan-2023-2027>

⁷ <https://www.gov.uk/guidance/national-planning-policy-framework/2-achieving-sustainable-development>

⁸ <https://www.gov.uk/guidance/national-planning-policy-framework/9-promoting-sustainable-transport>

roads would be problematic. It would not be an inclusive community and contrary to paragraph 96 of the NPPF⁹.

- e) Other than building the housing itself, it would not lead to further economic growth. Whilst it is noted that the development would include the construction of a new primary school, it is argued that this is not currently necessary and, with a falling birth rate, not likely to be required in the future. Hatherden Primary School, close to Weyhill, has closed in the past couple of years due to lack of demand, and there are also existing primary schools in Appleshaw and one serving Kimpton, Fyfield and Thruxton. The only reason for the building of a new school is to meet the demand of a housing development of this scale, which could equally be accommodated elsewhere.

As such it does not meet the strategic priorities.

The Settlement Hierarchy evidence base document¹⁰ sets out that the primary focus of growth is to be focused on:

“...In the northern area, growth is focussed primarily at Andover and adjacent to the market town of Ludgershall where there is good access to services, facilities, employment and public transport...”

Whilst the need to support growth in the Rural Area is referred to, it is very much on the basis that another location other than the larger settlements of Andover and Romsey will need to be found.

Of particular relevance is paragraph 7.9 which states:

“Smaller scale growth is appropriate in the rural area, which is of an appropriate scale relative to the scale and sustainability of the settlements, in order to support their sustainability and help sustain their existing local facilities and services”.

It is questioned as to how an allocation of over 1000 homes in Weyhill can be considered an appropriate scale which is relative to the sustainability of the settlement?

Furthermore paragraph 7.12 sets out that:

“The option of a new village was not preferred, given the extensive infrastructure requirements and timescales associated with this option and due to environmental and other sensitivities, weighed against the potential benefits. This was not considered appropriate for our spatial strategy and a wider strategic approach to distribution

⁹ <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-and-safe-communities>

¹⁰ Settlement Hierarchy Topic Paper 2022 Regulation 18 Stage 1 Local Plan

across the Borough is the preferred strategy. Nevertheless, a reasonable alternative option for housing growth, through substantial settlements extensions, was considered through the Interim SA (2025)”.

An allocation of this scale and nature will effectively create a new settlement in all but name. There are extensive infrastructure requirements needed in this location, the issue of timescales and constraints versus the benefits are the same as a new village and are explained in detail in the relevant sections below.

Finally, paragraph 7.13 puts forward the case for the development at Weyhill:

“The strategy does however bring forward a focussed expansion at one rural settlement, at Weyhill in the north of the Borough, to deliver over 1000 homes. The expansion of this village, which already has a reasonable range of amenities, employment opportunities and services, will enable delivery of a local primary school whilst supporting sustainability of the settlement. This approach recognises that service provision within villages will only improve if there is a population sufficient to support such services. Weyhill has a greater range of services, commercial and employment sites than many of the Tier 3 settlements, at Weyhill Fairground and to the east and south of the settlement. It also benefits from reasonable proximity and accessibility to Andover and Ludgershall via sustainable means with a regular bus route, and with potential for enhanced cycling and walking links”.

As set out below, the area does not have a ‘reasonable’ range of facilities and services. It does not ‘need’ a primary school and even with enhanced cycling and walking links, the issues as highlighted are unlikely to be overcome.

Sustainability of the Site in Context

Could TVBC confirm:

- **How the sustainability of the site was assessed in terms of which facilities were counted and whether these are still in operation presently?**
- **How accessibility is taken into account, considering realistic walking or cycling distances, obstacles and constraints, whether or not facilities are easily accessible to all members of the community including those with any mobility or other impairments (as detailed below)?**
- **Where were the measuring points taken from and how does this relate to each of the individual parcels of land allocated, given these are dispersed and walking distance from one site will be very different to another?**

The Settlement Hierarchy Assessment published originally for the Regulation 18 Stage 1 plan (2022) was then updated for this Regulation 18 Stage 2 draft in 2024. The updated methodology used is very clear when it comes to access to services. In paragraph 3.4 it states that:

“A community’s ability to access services such as shopping, education, good transport links and community facilities is important for maintaining their quality of life. Long distance travel to access these services is undesirable as this inevitably involves increased car use and reduces a settlement’s sustainability...”

Given the above, the Weyhill allocations do not accord with these objectives.

There are few facilities.

These key facilities considered are:

- Primary School;
- Food Store such as a village shop;
- Outdoor sports facility, such as a playground or sports pitch; and
- Community facility including Village or Community Hall, Public house or Social club, Place of Worship.

On this basis, Weyhill was given the following score.

Village	Key Facility: Primary school	Key Facility: Shop	Key Facility: Sports facility	Key Facility: Community facility (including a pub, hall or church)	Total Key Facilities	Other facilities Total	Draft Settlement Hierarchy Tier
Weyhill	0	1	0	1	2	6	3

- Weyhill does not have a primary school.
- It has a garden centre, with a café, which under current management does have a deli/ food hall, but because of the nature and price of goods, this is not somewhere local people can reasonably undertake a shopping trip. It should not be classed as a community facility, but instead as a shop for specialist goods. The Hillier website specifically says in relation to their site at Weyhill that they supply “... *carefully curated luxury items, as well as quality fresh produce, speciality snacks, craft beverages and handmade treats*”. This therefore is not a ‘convenience store’
- It is not clear whether the garden centre is counted in a number of different categories due to the uses within or just once.
- There are no sports facilities or playgrounds.

- There are no community facilities – no village hall, no public house, no social club, no place of worship (there is St Michael and All Angels Church in Penton Grafton Parish, but again this is beyond a 15 minute walk for the majority of existing and future residents in Amport Parish and difficult to access on foot as shown below).
- Whilst there are more facilities found within the adjacent Parish of Penton Grafton, this does not cover the area around the proposed housing designation, nor are the facilities easily accessible by the majority of existing or future residents. The isochrone maps below highlight 5, 15 and 30 minute walking distances from the allocated sites. As you can see, there are few facilities within a 15 minute walk, this does not accord with the assessment of sustainability in the Local Plan and the topic papers.
- Equally, pedestrian footways are intermittent, narrow or non-existent from many areas. There are no pedestrian crossings along the busy A342, which effectively acts as a barrier between the two. In fact, roads would need to be crossed more than once and potentially three times, to access any community facilities to the east.
- To access the bus service to Andover along the A342, you would need to cross the A342, there is currently no provision for this and works to the pavements to enable safe access would also require significant upgrading. Unfortunately given the nature of rural lanes, existing dwellings and land ownership constraints, this is unlikely to be adequately resolved. Even with potential compulsory purchase and a comprehensive masterplan approach, there would be little possibility for a north-south route and no ability to upgrade pedestrian connectivity for many of the land parcels.

It was noted that the other facilities noted as scoring a '6' included:

Shop with Post Office	None in Weyhill.
Post Office Only	None in Weyhill.
Other Shop	None in Weyhill, but petrol station shop and butchers in Penton Grafton Parish. Over 15 minutes walk for majority of residents and requires crossing of major roads).
Café/Restaurant	Weyhill only possesses one café, which is located within Hillier Garden Centre. There is also a café at The Fairground in Penton Grafton Parish and within the building of the Butchers at Penton Parish. (Over 15 minutes walk for majority of residents and requires crossing of major roads).
Takeaway	None in Weyhill.
Early Years	None in Weyhill.

Secondary School	None in Weyhill.
Further Education	None in Weyhill.
Other Education Facility	None in Weyhill.
Doctors	None in Weyhill.
Dentist	None in Weyhill.
Chemist	None in Weyhill.
Other Medical Facility	None in Weyhill.
Allotment	None in Weyhill.
Parks and Open Space	None in Weyhill.
Indoor Sport	None in Weyhill.
Bank	None in Weyhill.
Cashpoint	(None in Weyhill, but at petrol station in Penton Grafton Parish over 15 minutes walk for majority of residents and requires crossing of major roads).
Superfast Broadband (<i>Superfast broadband is more than 24mbps within the town or village</i>)	None in Weyhill.

Given the above consideration, the score of 6 for 'other facilities' does not reflect the actual situation in reality.

The supporting text of the Settlement Hierarchy Assessment in paragraph 4.5 sets out:

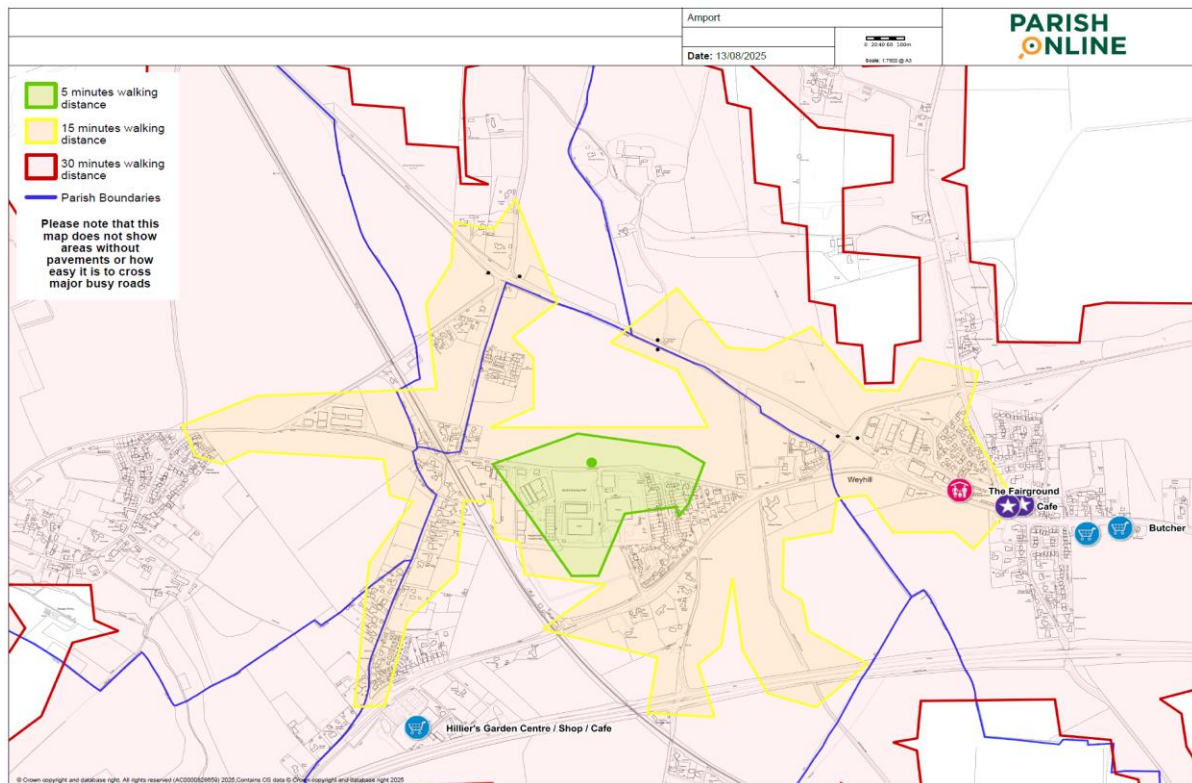
"In determining whether a settlement falls within Tier 3, the starting point has been settlements that have these key facilities as they comprise those key facilities which make a rural village sufficiently sustainable to support proportionate growth. Primary schools have been given more weight in the updated assessment, as villages with primary schools are usually served by the other key facilities as well as a range of other facilities. There may be some settlements where shared facilities exist and this will be considered accordingly. Also there may be some settlements where other factors may need to be considered to determine whether they are in Tier 3".

Therefore, whilst the area of Weyhill in Penton Grafton Parish may contain more facilities, this should not be confused with the area within Amport Parish and where the housing sites are allocated. As detailed below in the traffic and road network section, the lack of footways, paths or crossings highlights a severe safety issue. The barriers to accessing these facilities are considerable for those in Amport Parish. The levels of HGV movements in this area from the industrial and commercial units also make it difficult for cyclists, particularly when combined with narrow lane widths.

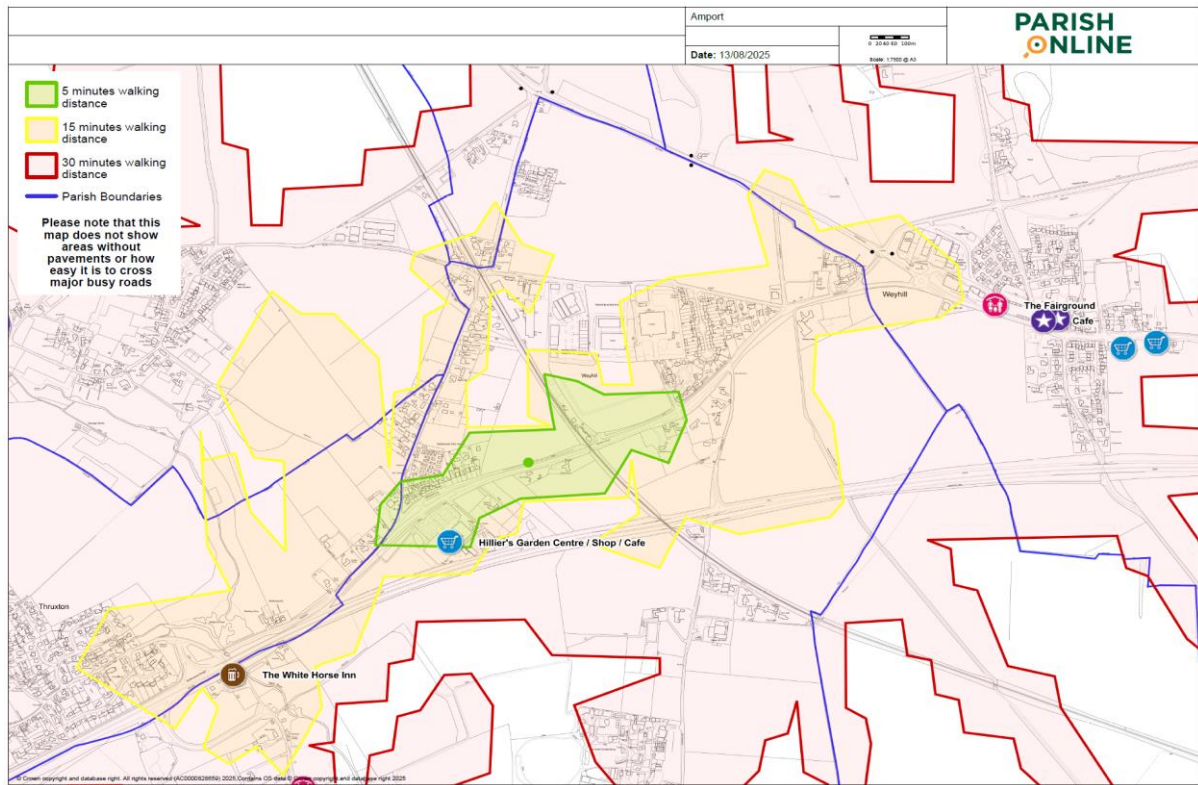
The following isochrones represent how far you can walk in set amount of time from the green circled areas on the plan. These represent just two locations of the potential access into allocated sites. This is a more accurate way of showing how far someone can travel compared to using concentric circles that don't take into account the road and path network.

The walking distances are calculated on GIS software Parish Online. The algorithm takes mapping data from OpenStreetMap to determine the walking and cycling infrastructure and applies an average speed for the travel methods. This is in the region of 5 kph (3.1mph) for walking. The maps highlight the lack of sustainability for the allocated sites, notwithstanding the lack of pavements and crossing points which act as further barriers.

The NA16 sites are in not in a sustainable location and even with improvements, this would not overcome some of the fundamental issues.



Isochrone 1 – Fyfield Road



Isochrone 2 – Amesbury Road

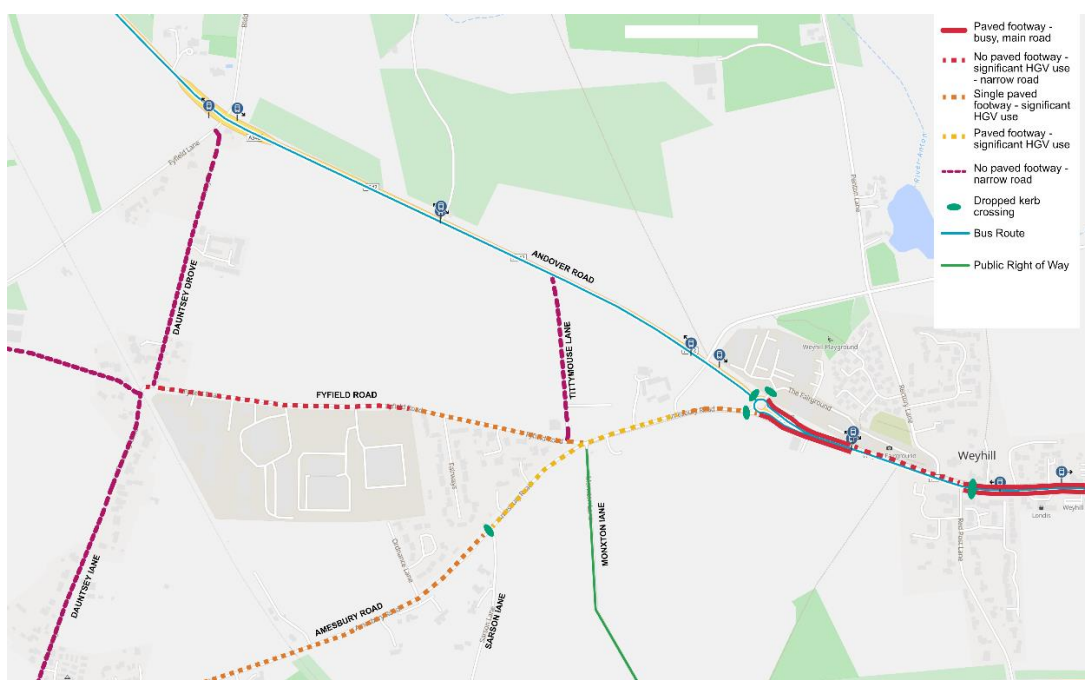
Traffic and Road Network and Public Transport

Could TVBC confirm:

- Whether modelling has been undertaken to look at the cumulative impact of the NA16 development with the land to the north around Ludgershall and at Thruxton on the A342.
- Has further collaborative work been undertaken with Wiltshire Council for to look at the additional impacts of the sites adjacent to the Test Valley boundary?
- Has modelling been undertaken with regard to the impact of the additional traffic onto the A303 and whether the junctions will need to be altered as a result?
- How will rural lanes be modified to accommodate mitigation measures required such as pavements, crossings and other safety improvements?
- Has a cohesive movement network been planned across all of the development sites in NA16?

- Will bus routes be brought into the allocated sites or remain solely on the A342? If the latter, how will residents be able to safely access the bus stops?

The maps below highlight the existing lack of pavements within this area, particularly on the narrow rural lanes. As stated above, many of these lanes are used by HGVs and there is continual conflict between road users. HGV drivers themselves have commented during community consultation that the roads are too narrow for vehicles to pass and this is made more difficult by cyclists and pedestrians in the road. With additional traffic (from over 1000 houses in Weyhill and the others around Ludgershall and Thruxton) the problems will be exacerbated considerably. How will the A342 and feeder roads be adapted to accommodate this traffic flow?



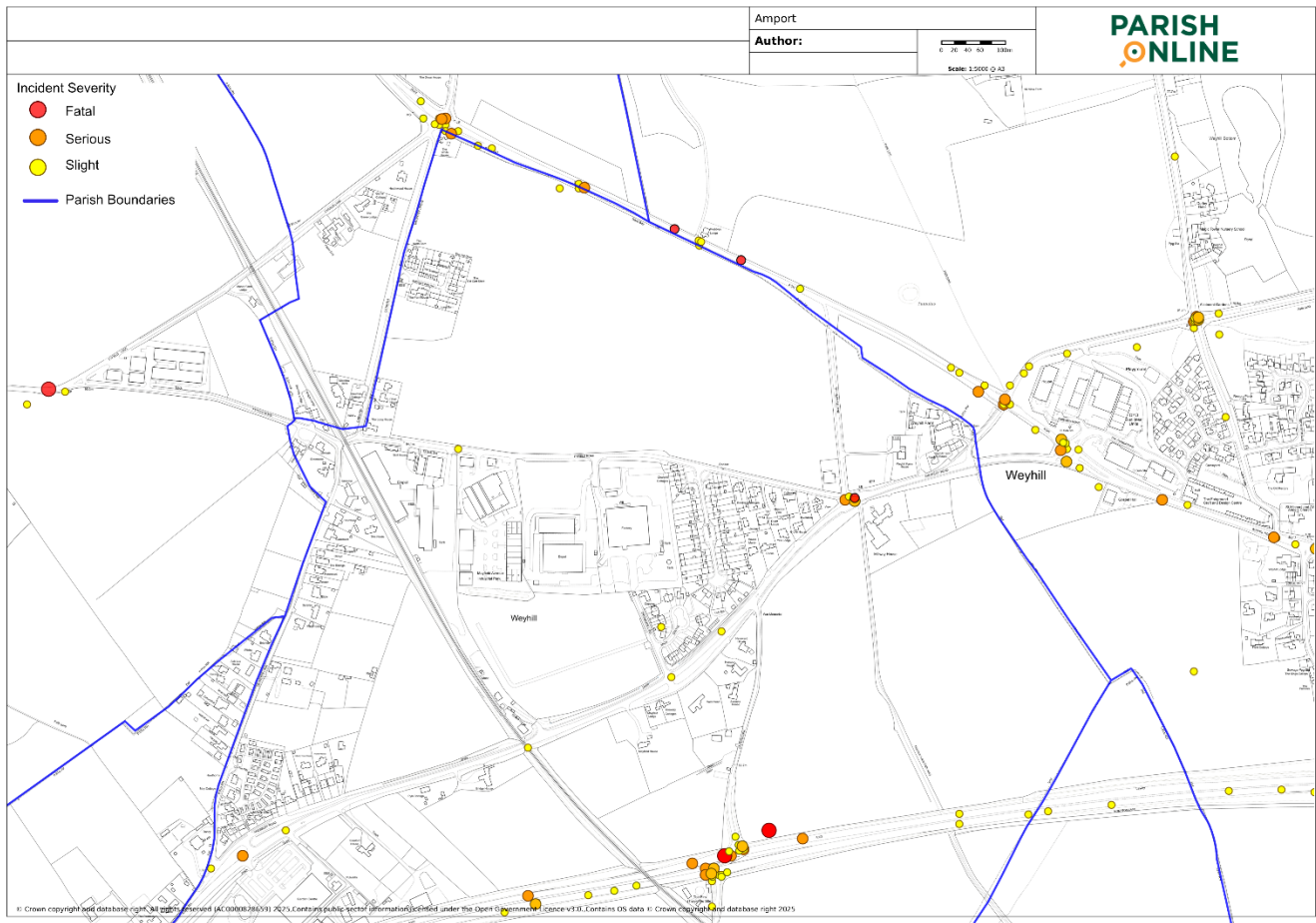
Accessibility for Pedestrians

With so many different parcels of land making up this allocation, it is difficult to understand how it will be possible to make accessible connections between sites and allow users access to improved pavements and paths.

There is currently poor access to bus routes, which is unsafe for pedestrians because of the lack of pavements and use of narrow lanes, limiting use for many people. Even if buses are rerouted further south, how will these connect to other sites without significant works and considerable costs?

The incident data maps as highlighted in the Neighbourhood Plan and below are taken from reported Department of Transport incidents up to mid 2024 (this does not include unreported incidents). The plan shows a number of areas in this part of the parish where accidents numbers are high and the nature of the incident is serious /

fatal. Many problems are focused on the access on and off of the A303 as well as the A342. Have improvement works been considered as part of the proposed allocations and costed into any viability assessment?



Road Traffic Incidents Over the Last 15 Years (Source: Department of Transport)

Lack of Facilities and Infrastructure

Could TVBC confirm:

- How healthcare provision for residents has been factored into the proposals?
- How wastewater will be dealt with given the significant constraints?

The lack of facilities has been discussed above in the accessibility section, but the level of infrastructure improvements required are considerable on this site. We would like to understand how this has been factored into the viability and deliverability of this allocation.

The NPPF looks at demonstrating whether a site can reasonably come forward¹¹:

“In order to demonstrate that there is a reasonable prospect these large scale developments can come forward, strategic policy-making authorities are expected to make a realistic assessment about the prospect of sites being developed (and associated delivery rates). Strategic policy-making authorities will need to demonstrate they have engaged with infrastructure providers, ensuring that they are aware of the nature and scale of such the proposals, and work collaboratively to ensure that the infrastructure requirements are not beyond what could reasonably be considered to be achievable within the planned timescales”.

A key concern is the lack of healthcare provision and access to it. With the construction of over 1000 houses, what additional provision will be made for GP surgeries, dental care and other health services? How will these be accessible to residents who cannot afford a car or do not drive?

There are considerable issues around wastewater and the infrastructure required. This is set out in a separate topic paper, but again has this been costed in delivering these sites?

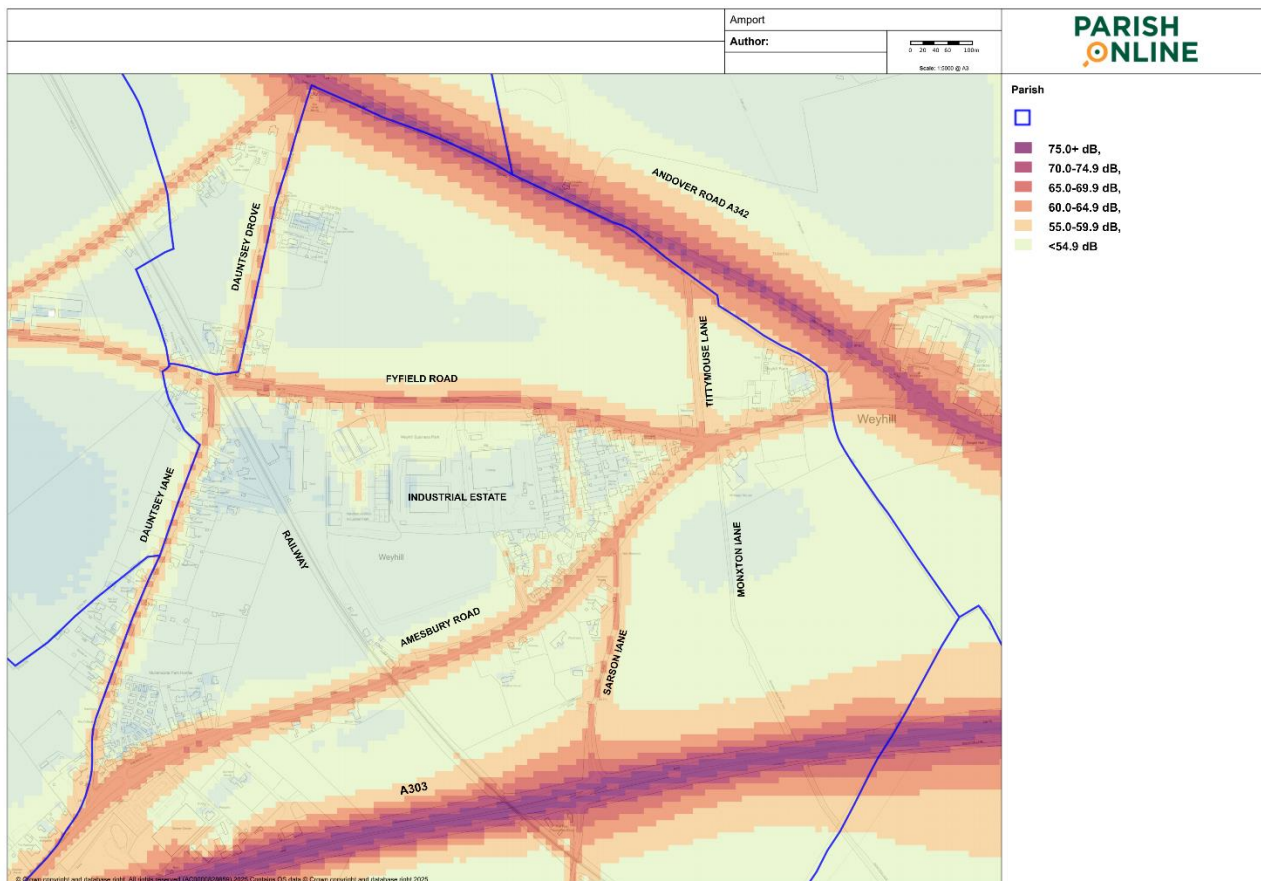
Noise and Air Pollution

Could TVBC confirm:

- **How much of the proposed allocation sites will be suitable for residential development given the noise and air pollution impacts from the A303, A342 and railway?**
- **How much of the proposed allocation sites will be suitable for residential development given the noise and air pollution impacts from industrial developments?**

The map below highlights the impacts from road noise on the potential housing sites. Please note that this does not include any rail noise. The map below highlights that there are extensive areas which will be adversely affected by noise, which will require mitigation and potentially the overall amount of land which may be suitable for development. Clearly this would be worsened by rail noise and that from the industrial estates. Has this been factored into the numbers of dwellings proposed?

¹¹ <https://www.gov.uk/guidance/plan-making> Paragraph: 060 Reference ID: 61-060-20190315



Road Noise Levels¹²

Equally, the Local Plan also allows for the expansion of the employment area at the centre of this allocation, this is likely to be in direct conflict with a housing allocation with additional pollution issues and complaints from residents.

The World Health Organization's (WHO) recommended background noise level is 40–45 dB, or where it leads to a decrease in the quality of life for residents due to constant loud background noise.

Environment | Ecology / Pillhill Brook / River Test / Solent

- See [Janet Wright's separate topic paper](#).

¹² The noise levels are modelled on a 10m grid at a receptor height of 4m above ground, polygons are then produced by merging neighboring cells within the following noise classes: 75.0+ dB, 70.0-74.9 dB, 65.0-69.9 dB, 60.0-64.9 dB, 55.0-59.9 dB, <54.9 dB This data is a product of the strategic noise mapping analysis undertaken in 2017 to meet the requirements of the Environmental Noise Directive (Directive 2002/49/EC) and the Environmental Noise (England) Regulations 2006 (as amended).

Neighbourhood Plan

Could TVBC confirm:

- **How they have taken the Submission Draft of the Amport Neighbourhood Plan into account when preparing the Local Plan?**
- **How is it envisaged that these proposals will be compatible with the identified important views, Biodiversity Opportunity Areas, Non-Designated Heritage Assets and Local Green Spaces in and around these sites?**

The Parish Council are extremely concerned that although TVBC have had close consultation with the Steering Group throughout the preparation of the Neighbourhood Plan, at no time has any concern been raised over the designations within the Neighbourhood Plan. Clearly there is a direct conflict between the policies in the Neighbourhood Plan and the emerging Local Plan (see plan overleaf).

The Neighbourhood Plan has been prepared through considerable community engagement in addition to independent consultant support. In particular Important Views, NDHAs and Local Green Spaces in Weyhill will all be impacted by the allocation sites (see plan below).

Many important views cover the sites within NA16, these areas cannot be developed to the degree required without adversely impacting upon these.

There are Local Green Space designations (Policy AM4) and Biodiversity Opportunity Areas (Policy AM6) which are either adjacent to or cross what would become access points into the sites.

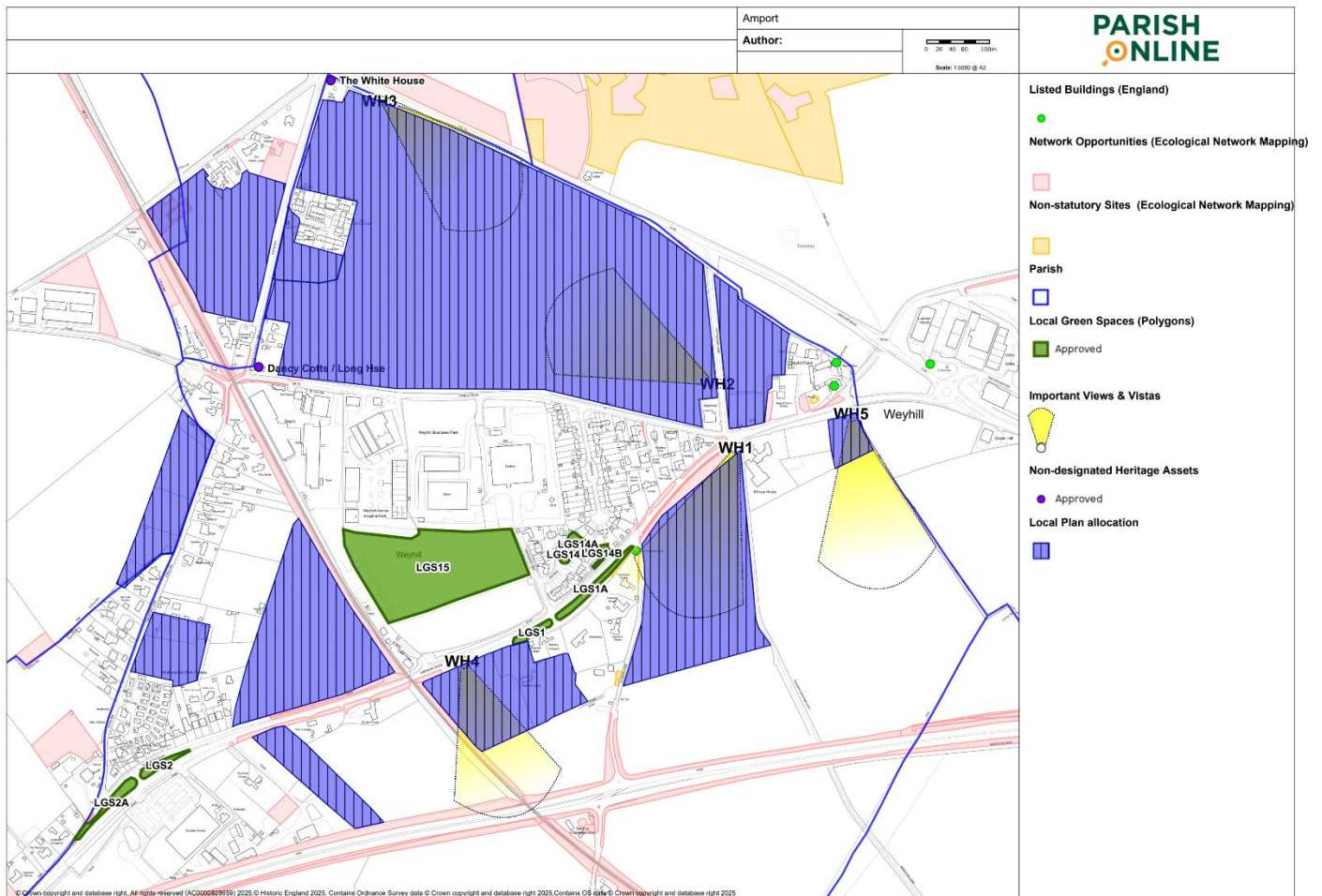
There are two NDHAs (Policy AM8) and a number of listed buildings and structures which would be adversely affected by the nature and scale of the proposals. There are also a number of archaeological sites either within the sites or on the boundaries, which would need to be considered.

The proposed development would need to be at a much higher density than the surrounding area. This would be contrary to the findings of the Character Appraisal where densities are between 10-25 dph with many properties set in large well vegetated plots. Policy AM9 of the Neighbourhood Plan refers to the Design Code which refers in detail to the Settlement Pattern (LB.01), Settlement Edge (LB.02). Preserving and promoting the local vernacular (LB.05) it is considered that given the constraints and high numbers of dwellings proposed, there is no possible solution which would accord with this policy and the Design Code.

In view of this, what steps are being taken to minimise these conflicts and to take our work into account?

What evidence base work exists which nullifies or contradicts the Neighbourhood Plan evidence base?

How has the TVBC commissioned Housing Need Survey been taken into account in this site allocation and our policies to support local people have been considered?



Neighbourhood Plan Policies Overlaid with NA16 Housing Allocation

SEA / HRA Process

Could TVBC confirm:

- How have the reasonable alternatives been arrived at? There appears to be no consideration of the impacts of a proposal which does not include the land at Weyhill to compare against.

From an examination of the SEA, each of the scenarios for growth features the NA16 site allocation. It is therefore impossible to separate out the impact of this proposal alone.

Whilst it is understood that the housing number is required, there is more than one option to accommodate this growth. The options presented are clearly different to those previously considered under the previous draft Local Plan, where an extension to Weyhill was considered inappropriate.

It has not been clearly explained why this approach has been included, particularly when it is not consistent with the spatial strategy.

No specific mitigation measures for the NA16 can be examined in isolation and the impacts of the sites as a whole are not comparable to NA16 given the scale of this rural site, which is not in a sustainable location. It is vastly different to the other large sites included.

The cumulative impact of the sites along the A342 and within Wiltshire should also be considered in more detail as these have a very different impact on this part of the Borough compared to other areas.

Could TVBC provide evidence to highlight what work has been undertaken which looks specifically at the impacts from this site and any cumulative work in this area?

Conclusion

It is considered that insufficient work has been undertaken to support the allocation of sites in policy NA16 and that the constraints and infrastructure requirements are much greater than assessed.

It is understood that not all of the sites are available for development, which would lead to further fragmentation. The nature, number and location of these dispersed sites will not lead to a comprehensive masterplan approach. The development of these parcels will result in sites being poorly accessed by anything other than motor vehicles, with little to no potential for new pedestrian and cycle paths.

As such, the numbers proposed in Policy NA16 do not represent the constraints of this location and a substantially lower figure would be developable.

A smaller development is not justifiable, with no need for major development in this unsustainable location.

It is therefore argued that this allocation as proposed is not realistically achievable and cannot come forward within the Plan period, therefore it should be removed from the Local Plan.