

In the Chair: Cllr I Culley

**ATTENDANCE:**

A	Cllr A Goddard	A	Cllr J Critchley
P	Cllr C Burgess	P	Cllr I Culley
P	Cllr M G Cooper	A	Cllr S Gidley
P	Cllr J Parker	A	Cllr J Ray
A	Cllr R Theron		

In attendance: Nicqui Chatterley – Planning Clerk

**146. Apologies**

Cllr J Critchley, Cllr A Goddard, Cllr J Ray, Cllr S Gidley. Cllr R Theron

**147. Public Participation**

Mr D Faria

**148. Declarations of Interest**

**149. Planning Applications**

To consider Test Valley Borough Council Local Plan 2040.

**RTC comments on Local Plan 2040 Policies attached**

Cllr Ian Cully asked for a public acknowledgment and gratitude for the work Cllr Critchley, Cllr Cooper & Cllr Parker have done on the Local Plan 2040.

Meeting ended at: 9.45 pm

Next meeting: Tuesday 26th March 2024 at 7.30 pm  
**Extraordinary Full Council**

## ROMSEY TOWN COUNCIL COMMENTS ON DRAFT LOCAL PLAN 2040 REGULATION 18 STAGE 2

### POLICY BY POLICY COMMENTS

POLICY CODE	DESCRIPTION	COMMENT
SS1	Settlement hierarchy	Wellow and King's Somborne should be in Tier 2. Tier 3 settlements should be given strategic allocations unless constraints make this impracticable. <b>Parish Councils have been invited to allocate housing by way of a Neighbourhood Plan</b> <b>TVBC have employees to assist Parish Councils with the Dispersal Policy.</b>
SS2	Development in the countryside	The settlement boundary proposed for Romsey is perverse in that certain areas that are clearly associated with the settlement are excluded whilst certain SINC areas are included. The Mountbatten School's playing fields are outside the settlement boundary while the school is within it. The Scout Hall, associated land and cemetery on Braishfield Road are outside the settlement boundary whilst obviously part of the settlement. The Beggars Path Wood, which is a SINC and adjoins Mountbatten School playing fields, is curiously in the settlement boundary. The dwellings on the north side of Crampmoor Lane are included within the settlement boundary whilst those on the south side are excluded. The boundary and the rationale behind it needs to be further reviewed.
SS3	Housing requirement	The Housing Market Areas and their housing requirements are accepted <b>SS3 will need to be amended to show that all settlements in Tier 3 should have a neighbourhood plan.</b>
SS4	Rural housing requirement	Rather than relying on Neighbourhood Plans to deliver rural housing, there should be a positive policy of allocation to the rural area. This would serve two purposes. It would make a positive contribution to maintain the vitality of villages or to help recover it for those areas that are already depleted. It would also make the housing allocation fairer, so the allocation followed the current population pattern. Around 20% of Test Valley is rural but only 5% of the housing is planned for rural areas.
SS5	NDP housing requirements	While the requirement for housing allocation in the designated areas is welcome, the scheme is flawed inasmuch as settlements that do not have a designated area or choose not to produce neighbourhood plans have no specific minimum housing requirement.
Table 3.3	Housing requirement and supply	If an extra row showing the balance required to meet the minimum housing requirement were added it would clarify the extent to which the allocations

		exceed the minimum. For Southern Test Valley it would show an initial requirement of 1562 against an allocation of 1644 and, after inclusion of rural and windfall forecasts, an oversupply of 757 houses or 16 %.
SS6	Meeting the housing need	Comments are given for each of the strategic allocations where they are relevant to Romsey.
SS7	Employment land requirement	See comments below on Table 3.5
Table 3.5	Employment supply	The demand for B8 space in Southern Test Valley seems very high given that there appears to be empty units on some of the industrial sites. However, if the B8 requirement is correct how is the shortfall to be resolved?
SS8	Meeting employment land requirement	Comments are given for each of the strategic allocations where they are relevant to Romsey.
SS9	Delivery, monitoring and contingency	What contingency measures are envisaged? Would it be appropriate to have some reserve sites identified?
NA1 to NA10	Northern area specific sites	No comment as these are not in Romsey Town and do not impinge on Romsey.
SA1	Romsey Town Centre	Concur but query whether the 30 homes are included in the earlier calculations.
SA2	Delivering high quality development in Romsey Town Centre	Whilst concurring with the detail it is noted that the policy is poorly phrased in that it should say something like: "Development in Romsey Town Centre will only be permitted if..." The current wording is too loose. <b>What is high quality development?</b>
SA3	Romsey Town Centre uses	Again, the phrasing is poor in that it does not direct what the developer must do. It is also not clear if the policy can be enforced given the ever-widening scope of use classes including the recent introduction of Class E. <b>New use of Class E encompasses a whole range with the potential of switching without planning permission.</b>
SA4	Land south of Ganger Farm, Romsey	There is a current undetermined planning application for this land to which Romsey Town Council has objected. See 23/00964/OUTS. In particular, channelling all the traffic through the existing entrance at Jermyn's Lane then through the existing estate and finally through Scoreys Crescent which was designed as a terminating close is unacceptable. There must, at least, be a second vehicular access for emergencies and to preserve the amenity of the existing estate. Ideally an access from Braishfield Road along Ganger Farm Lane would help. <b>Object to the allocation south of Ganger Farm. Damage to the ecology of the intended path/cycleway. Allocation at the Hilliers site would be preferable. Cllr Cooper / Cllr Burgess</b>

SA5	Land south of the Bypass, Romsey	The only additional requirement is that the layout should preserve the amenity of the existing dwellings in Burma Road. <b>Look after the amenity of the current residents. The character of the cottages at Burma Road is an indicative heritage buffer (partially object) should be protected to the south and east of the boundary in order to preserve the historic character of the 6 dwellings.</b>
SA6	Land at Velmore Farm	No comment as this is not in Romsey Town and does not impinge on Romsey.
SA7	Land at King Edward Park, Ampfield	No comment as this is not in Romsey Town and does not impinge on Romsey.
SA8	Land at Upton Lane	No comment as this is not in Romsey Town and does not impinge on Romsey.
SA9	Land adjacent to Abbey Park Industrial Estate, Romsey	There is a current undetermined planning application for this development, 22/03069/OUTS. RTC commented on this in November 2022. While it is in a local gap, its location and intent to dedicated open space would minimise the harm. The dedication of open space must be part of the policy. <b>Preserve the local gap.</b> <b>Object to the extension of Abbey Park Industrial Estate</b>
SA10	Land south of Botley Road, Romsey	There is a current undetermined planning application for this development, 23/03214. RTC objected to this in January 2024. The site is in the local gap between Romsey and North Baddesley and, as such, would diminish the gap as observed from the A27 at its the narrowest point by around 50%. This is unacceptable. <b>Re-enforce the perception of the gap from the main road is a priority</b>
SA11	Land east of Test Valley Business Park	No comment as this is not in Romsey Town and does not impinge on Romsey.
SA12	Kennels Farm, University of Southampton Science Park, Chilworth	No comment as this is not in Romsey Town and does not impinge on Romsey except inasmuch as it is an important positive plan to increase the high-tech employment in the south of Test Valley.
SA13	University of Southampton Science Park, Chilworth	No comment as this is not in Romsey Town and does not impinge on Romsey except inasmuch as it is an important positive plan to increase the high-tech employment in the south of Test Valley.
SA14	Land at Adanac Park, Nursling	No comment as this is not in Romsey Town and does not impinge on Romsey.
SA15	Nursling Estate, Nursling	No comment as this is not in Romsey Town and does not impinge on Romsey.
SA16	Forest Park	An interesting idea that has carried forward from the current local plan. However, it is likely to be undeliverable unless e relevant landowners gain some alternative benefit. What is the trade off?
SA17	Stockbridge local centre	No comment as this is not in Romsey Town and does not impinge on Romsey.

CL1	Countering climate change	Poorly worded. Should be in the form: "Development will only be permitted if..." The requirements are very vague and unquantified and, therefore, may not be helpful to planning decisions.
CL2	Flood risk	Good.
CL3	Sustainable buildings and energy use	Poorly worded. Should be in the form: "Development will only be permitted if..." Avoid the use of "should" but use "must". The principles are welcomed. <b>Putting specific numbers in risks the becoming out of date – should comply with legislation and enforcement subsequent to update requirements – these should be live documents to be kept up to date and applicable at the time.</b>
CL4	Water use and management	Poorly worded. Should be in the form: "Development will only be permitted if..." Avoid the use of "should" but use "must". The principles are welcomed.
CL5	Renewable and low carbon energy	Poorly worded. Should be in the form: "Development will only be permitted if..." Avoid the use of "should" but use "must". The principles are welcomed.
COM1	Delivering infrastructure	Good words but does not clearly indicate what constitutes infrastructure. In the public's mind this includes GPs, dentists, assured water supply and sewage systems and public transport. This policy does nothing to rectify existing infrastructure shortfalls albeit that these are probably beyond the ability of the local plan to provide. A site-specific approach is needed to avoid the formulaic specification of local infrastructure such as requiring a pub at Abbotswood when there were already three in the vicinity. No wonder it was not viable. Having specified the infrastructure there needs to be a more rigorous approach to getting it implemented.
COM2	Community services and facilities	Content with this policy.
TC1	Main town centre uses	Content with this policy.
ENV1	Historic environment	Content with this policy especially non-designated heritage assets.
ENV2	Development affecting heritage assets	Content with this policy especially non-designated heritage assets. <b>Permit development which reduces carbon foot print such as solar panels, air source and ground source pumps so long as there is no substantial harm to listed buildings or heritage assets.</b>
ENV3	Landscape character	Content with this policy.
ENV4	Local gaps	RTC objects to the proposal to reduce the local gap between Romsey and North Baddesley along the length of the A27. This is the narrowest part of the local gap and one that is most observable from the public realm. <b>Numbers or letter designation – not bullet points for lists in policies</b>
ENV5	Pollution	Content with this policy.
ENV6	Lighting	Content with this policy.

ENV7	Amenity	Content with this policy.
BIO1	Conservation and enhancement of biodiversity and geological interest	Content with this policy.
BIO2	International nature conservation designations	Content with this policy.
BIO3	Biodiversity net gain	Content with this policy but it may be difficult to enforce and, indeed, difficult to implement on small developments.
BIO4	Green infrastructure	Poorly worded. Should be in the form: "Development will only be permitted if..."
BIO5	Trees and hedgerows	This policy is welcomed. <b>Every opportunity should be taken to ensure hedgerow and tree groups are linked together to create and maintain wildlife corridors.</b>
HE1	Open space and recreation	The principles are good, but the policy must allow for the consolidation of open space and recreation facilities across several developments to avoid isolated and under used areas and play parks. The implementation must avoid the current S106 problems of money for pocket work in areas with no available space. <b>Maintain Rapids space as a public amenity.</b> <b>Recreation space accessible from the town for young people.</b> <b>Cllr Burgess/Cllr Cullery to draft wording regarding missing policy on preserving existing and provision of space for young people to kick a ball around.</b>
HE2	Existing open space	Content with this policy.
HE3	Access to the countryside	A good policy but it would be useful to have some policy that encourages joining up of existing bits of footpaths, cycleways and other PROWs.
DES1	Deliver of sustainable and high-quality design	Poorly worded. Should be in the form: "Development will only be permitted if..." There is no apparent mention of designing developments to minimise crime and maximise householder security. <b>So long as the safety and security of the neighbourhood is not compromised.</b>
DES2	Design details and considerations	Content with this policy.
DES3	Residential areas of special character	Content with this policy.
DES4	Public art	Content with this policy but would like to see the encouragement of public art that incorporates water and/or fountains to reflect the Boroughs tie to the River Test.
HOU1	Affordable housing	A good policy but it still requires the building of unaffordable housing at a ratio of 60:40. It also does nothing to ensure affordable housing can actually be afforded by young residents and less well-off families. It would be useful to explain what is meant by affordable housing and even better if the costs could be tied to local salaries rather than local housing prices. Should the Council start building council houses again?

HOU2	Community led development	A good policy but would it be better to actively encourage rather than just permit? The wording seems a bit discouraging.
HOU3	Rural exception affordable housing	A good policy but would it be better to actively encourage rather than just permit? The wording seems a bit discouraging.
HOU4	First homes exception affordable housing	A good policy but would it be better to actively encourage rather than just permit? The wording seems a bit discouraging.
HOU5	Provision of housing to meet our needs	A good policy but is it enforceable with developers adept at claiming viability problems?
HOU6	Residential space standards	Poorly worded. Should be in the form: "Development will only be permitted if..."
HOU7	Self-build and custom build housing	A good policy but is it enforceable with developers adept at claiming viability problems?
HOU8	Meeting the needs of gypsies, travellers and travelling showpeople	A necessary policy but with little indication how, even over the period to 2040, the required number of pitches will be met. Presumably, based on local case law and guidance, there is no longer a possibility to tie the need to people who have a strong connection with the Borough.
HOU9	Gypsies, travellers and travelling showpeople	A corollary to policy HOU8 and, indeed, could be combined with it. Neither policy makes provision for temporary sites to accommodate groups on their travels which has been a major issue in the Borough with occasional invasions of recreation grounds and open spaces.
HOU10	Occupational accommodation for rural workers in the countryside	Content with this policy but it would be helpful to strengthen it to avoid such applications been used as a Trojan Horse to get a non-agricultural dwelling in the countryside contrary to the settlement policy.
HOU11	Existing dwellings and ancillary residential development in the countryside	Content with this policy.
HOU12	Replacement dwellings in the countryside	Content with this policy.
EC1	Retention of employment land and strategic employment sites	Content with this policy.
EC2	Re-use of buildings in the countryside	Content with this policy. However, it does not seem to be strong enough to cover the conversion of redundant agricultural buildings into dwellings under real or fictitious Class Q interpretations. At the moment we are at the mercy of Class Q policies which would appear to be regularly abused.
EC3	Rural diversification and employment in the countryside	Content with this policy.
EC4	Tourism	Content with this policy but would like to see the encouragement of rather than just the permission of tourist developments. This policy may need to be amplified when the new tourism strategy gets promulgated.

EC5	Skills and training	Whilst the policies in this plan must be tied to development, there is a need to support a wider range of skills training including in the newer green industries and in hospitality, the latter going hand in hand with our tourism objectives.
TR1	Active and sustainable travel	A good policy but frustrated by the lack of public transport and the potential loss of some community transport initiatives due to spending cuts. <i>Design cycleways which are dedicated rights of way (additional wording here)</i>
TR2	Assessing transport impacts	A good policy provided that it is deemed reasonable to require developers to fund travel improvements that are not immediately adjacent to the development site but can reasonably be impacted by the development.
TR3	Parking	The policy seems to lack direction as to where parking provision is to be located. Recent developments have shown parking courts to be unpopular with most residents parking close to their front door for ease of access and for security. It is also not clear what the parking standards are without referencing other material and what is different for developments in the town centres. <i>Parking courts should be discouraged.</i> <i>Parking should be overlooked as a primary security measure.</i> <i>Missing policy on charging points (latest technology).</i> <i>Housing developers should provide provision for electric charging.</i>

Explore viability of renewable energy policy – hydrogeneration of the water system????

**Cllr John Parker**  
**14 March 2024**