

## **ROMSEY TOWN COUNCIL RESPONSE TO THE TEST VALLEY BOROUGH LOCAL PLAN 2040 REGULATION 18 STAGE 2 CONSULTATION**

This response is in two parts. The first part highlights matters that are of greatest concern to Romsey Town Council (RTC); the second part is RTC's detailed comments on all the proposed policies.

### **PART 1 – MATTERS OF GREATEST CONCERN**

#### Settlement Hierarchy

RTC has concerns about the methodology used for establishing the **settlement hierarchies** and the conclusions reached. RTC believes that Wellow and King's Somborne should be in tier 2.

#### Housing Allocation

RTC believes that rural settlements should take their share of new housing rather than no housing at all. (SS1, SS3, SS4, SS5, & table 3.3). This is in the interest of ensuring vitality of the villages and fairness of allocation. Currently 20% of TVBC by population is rural but only 5% of the housing is allocated there.

**RTC objects** to the current policy in that it does not specifically allocate housing to the tier 3 settlements.

#### Employment Sites and Local Gap

RTC, while recognising the need for **employment sites**, objects to proposals that extend Abbey Business Park immediately south of the A27 as this will dramatically reduce the perceived local gap between Romsey and North Baddesley. (SA10).

**RTC objects** to the SA10 allocation.

#### Romsey Settlement Boundary

The **settlement boundary** proposal for Romsey has perversities that we question, for example separating Mountbatten School playing fields from the school and designating Woodley cemetery as countryside. We query why the north side of Crampmoor Lane is within the settlement boundary, but the southern side is countryside.

Designating 'land north of Oxlease' as countryside is welcomed as long as it really does preserve that site from development. (SS2). RTC enquires if any special status could be given to the land given its proximity to Fishlake Meadow nature reserve.

We note that land between Southampton Road and the railway is included within the settlement boundary.

## Local Gap

**Local gap:** the current local gap between Romsey and North Baddesley is sacrosanct and must be preserved. (ENV4). In particular, the gap as observed from the A27 is vital to preserve as it is the key public viewpoint.

**RTC objects** to the proposed reduction in the Romsey – North Baddesley local gap.

## Land south of Ganger Farm, Romsey

RTC is strongly opposed to the current undetermined application for outline planning permission at **land south of Ganger Farm** and hence its allocation in the draft local plan. In particular RTC objects to the only access being down through the existing Kings Chase estate and ultimately through Scorey's Crescent. Consideration must be given to another access point. (SA4).

**RTC objects** to the allocation of Ganger Farm phase 2 (SA4). Would Hillier's Brentry Nursery be preferable? We accept that if we object to the development of a site, then another will have to be found within Romsey.

## Further Sites

There is still the matter of the Brewery brownfield site that Romsey is desperate to have developed.

We also believe that there should be agreed reserved housing allocations to action should the housing land supply fall below 5 years.

## Delivering High Quality Development

**Delivering high quality development** is subjective; needs more definition, including what is actually possible considering central government rules. (General, SA2 & DES1).

## Open Space Provision

There is a need to look at **open space** provision in Romsey. (HE1) possibly including informal (kick about) recreation area(s) in easy reach of the town centre.

## Infrastructure

The delivery of infrastructure is a matter that exercises councils and residents alike although some are not local planning matters. Consideration needs to be given to the strategic planning of infrastructure. Many housing developments happen in isolation and with little thought about overall infrastructure needs, especially roads.

The suggestion that primary care GPs should only be about extending existing sites is perverse in an expanding town and will encourage unnecessary traffic movements because these are all in the centre of Romsey. (COM1)

## Wording

A general comment: a considerable amount of the language in the policies is vague and needs to be more precise. It also must relate to HMG regulations and what is actually possible (e.g. solar panels on properties in new developments).

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**PART 2 - POLICY BY POLICY COMMENTS**

<b>POLICY CODE</b>	<b>DESCRIPTION</b>	<b>COMMENT</b>
SS1	Settlement hierarchy	<p>Wellow and King's Somborne should be in Tier 2. Tier 3 settlements should be given strategic allocations unless constraints make this impracticable. RTC notes that parish councils have been invited to allocate housing by way of a Neighbourhood Plan and while TVBC has employees to assist parish councils with this it is feared that this will be inadequate to achieve a policy of dispersal that maintains or improves village vitality and a fairness of housing allocation.</p>
SS2	Development in the countryside	<p>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.</p>
SS3	Housing requirement	<p>The Housing Market Areas and their housing requirements are accepted. SS3 will need to be amended to show that all settlements in Tier 3 should have a neighbourhood plan which seeks to allocate housing unless constraints prevent it.</p>

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's population is rural but only 5% of the housing is planned for rural areas.
SS5	NDP housing requirements	<b>RTC OBJECTS</b> to the current policy for housing allocation. 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. What exactly is meant by high quality development?
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. The new use Class E encompasses a whole range of uses with the potential of switching between them without the requirement for planning permission.
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. In addition, the development would cause and, in particular the footpath/cycleway would cause damage to important ecology of the area.
SA5	Land south of the Bypass, Romsey	As this policy stands <b>RTC OBJECTS</b> to it. The only additional requirements are that the layout should preserve the amenity of the existing residents of the dwellings in Burma Road and seek to protect heritage character of the cottages at Burma Road. The indicative heritage buffer needs to be extended to the south and east of the boundary of Burma Road in order to preserve the historic character of the six dwellings.
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 dedicate open space would minimise the harm. The dedication of open space must be part of the policy.

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 narrowest point by around 50%. This is unacceptable as the preservation of the perceived gap between the settlements as viewed from the A27 is vital.
SA11	Land east of Test Valley Business Park	<b>RTC OBJECTS</b> to this allocation.
SA12	Kennels Farm, University of Southampton Science Park, Chilworth	No comment as this is not in Romsey Town and does not impinge on Romsey.
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 the relevant landowners gain some alternative benefit. What is the proposed 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. Putting specific numbers in risks the policy becoming out of date. It would be better to say must comply with current legislation and policies in the associated Supplementary Planning Documents. It is easier to update SPDs and, therefore, keep them up to date than change the local plan.
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 Abbotswold 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. However, RTC believes that development should be permitted which reduces the carbon footprint of heritage and non-designated heritage assets such as solar panels, air source and ground source heat pumps so long as there is no substantial harm to listed buildings, heritage assets or non-designated heritage assets or significant aspects of their settings.
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. Numbers or letters should be used to label list items to aid reference.
ENV5	Pollution	<b>RTC OBJECTS</b> to this policy in respect of the Romsey – North Baddesley gap. 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.
BIO4	Green infrastructure	Poorly worded. Should be in the form: "Development will only be permitted if..."
BIO5	Trees and hedgerows	This policy is welcomed. Every opportunity should be taken to ensure hedgerow and tree groups are linked together to create and maintain wildlife corridors.
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 allocation for areas with no available space.  The land around the Rapids must be preserved for sports, recreation and open space use and any land not designated for those specific purposes must be made available as kick-about areas. This would provide an informal recreation area within easy reach of the town centre.
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. The words "so long as the safety and security of the neighbourhood is not compromised" should be added.
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 being 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. Cycleways must be designed as dedicated rights of way with priority over vehicular access at junctions and must be maintained in good condition. Fragmented cycleways must be joined up.
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. Parking courts should be discouraged. Parking should be such that vehicles are overlooked as a primary security measure. It is also not clear what the parking standards are without referencing other material and what is different for developments in the town centres.
Missing 1	Electric vehicle charging points	There needs to be clear policy guidance on the provision of electric vehicle charging points with a requirement on developers to provide such facilities. There also needs to be one or more allocations of land for public EV charging parks.
Missing 2	Renewable energy	There needs to be a policy encouraging renewable energy generation including, as Test Valley is primarily an area brought together by the river, the use of hydroelectric generation subject to preserving the vital ecology.