

# Draft Test Valley Local Plan 2040 – Regulation 18 Stage 2 Consultation

## Response of the Nursling and Rownhams Parish Council

### Background

Test Valley Borough Council (TVBC) is consulting on its proposed Local Plan for Test Valley to 2040. The consultation period ends at noon on 2<sup>nd</sup> April 2024. The Parish Council met to discuss the Draft Local Plan at its meeting on Tuesday 5<sup>th</sup> March and agreed to endorse this response.

### Parish Council Response to the Consultation

The Draft Local Plan sets out the following vision for Test Valley in 2040:

*By 2040, Test Valley Borough's communities will be prosperous and resilient by:*

*Providing access to good quality homes that will meet a range of needs and aspirations, including affordable housing. Countering our changing climate through mitigation and adaptation and delivering well designed developments to a high standard that encourage inclusivity, health and security. High quality of life will be experienced by our communities, and they will enjoy a strong sense of identity. Development will take place in sustainable locations and support the delivery of infrastructure.*

*The Borough's economy will be thriving and supported by a skilled workforce. The economy will experience sustainable growth across a range of sectors, including the high technology and green industries and the visitor economy. Residents will have access to training, education and work opportunities and enjoy well-connected working environments. The Borough will continue to be known for its varied, green and distinctive landscapes, heritage and rich ecology.*

*Our diverse natural, built and cultural resources will be safeguarded for future generations to enjoy including access to our outstanding countryside. The character of our individual settlements will be maintained and their sense of place enhanced. The market towns of Andover and Romsey will have thriving town centres, offering high quality connected green and public spaces and a mix of leisure, shopping and cultural facilities and homes, with sustainable transport connections.*

*Communities will be empowered to plan to meet the varying needs and priorities of their communities to help support their sustainability and vibrancy.*

It is a vision the Parish Council supports . The Parish Council also supports the key objectives of the Draft Local Plan including the following:

*Our Communities* - Deliver and strengthen sustainable, cohesive and healthy communities in our towns and villages. Secure lasting benefits for our communities, including enhancements to social, green, health, educational and other local infrastructure through new development in sustainable locations. Support the viability of the Borough's town and local village centres in meeting many of the daily needs of our communities and residents.

*Built, Historic and Natural Environment*- Conserve and enhance the built, historic and natural environment, including local character, identity, cultural heritage, the variety of local landscapes and the special landscape character of the Borough for everyone to enjoy.

*Ecology and Biodiversity* - Conserve and enhance biodiversity, by taking opportunities to promote, and secure clear and measurable improvements to habitats and biodiversity. Enhance the connectivity, quantity and quality of ecological and green infrastructure networks, to help maintain and enhance the condition of protected nature conservation sites, protected species and the resilience of biodiverse environments to the changing climate

*Health, Wellbeing, and Recreation* - Encourage active lifestyles and enhance health and wellbeing, by providing opportunities for recreational, and community activities, through the provision of accessible open spaces, access to the countryside, sports, leisure and other community facilities and services. Work with the Council's partners to secure access to healthcare for all, including the Borough's most vulnerable residents.

*Design* - Deliver safe, attractive, integrated and well-designed environments that take account of and respond positively to local context and character. Strengthen the sense of belonging and identity within Test Valley by supporting enhancements to the distinctive towns and villages of the Borough. Place-making will be integral to our design approach, helping to strengthen our connections between people and place.

*Housing* - Provide a range of homes that are fit for purpose and designed to meet the needs and aspirations of different groups within the community, including a range of affordable housing and homes that meet the needs of an ageing population.

*Economy, Prosperity and Skills* - Promote a vibrant and resilient local economy, including the visitor economy, where future sustainable growth and innovation in green, high technology and other sectors can provide for a range of job opportunities and where businesses and individuals can thrive. Support a skilled and diverse workforce so that local people can access learning opportunities and jobs and benefit from greater prosperity.

*Transport and Movement* - Encourage active and sustainable modes of transport, that are accessible, safe and attractive to use, whilst also seeking to reduce the impact of travel in

*particular by private car. Ensure new development facilitates improvements to accessibility, safety and connectivity in our transport infrastructure.*

We have used these key objectives and the draft policies they have informed, as a reference framework for our response to the Draft Local Plan and tested what is being proposed in our Parish and across the wider borough, against these key objectives.

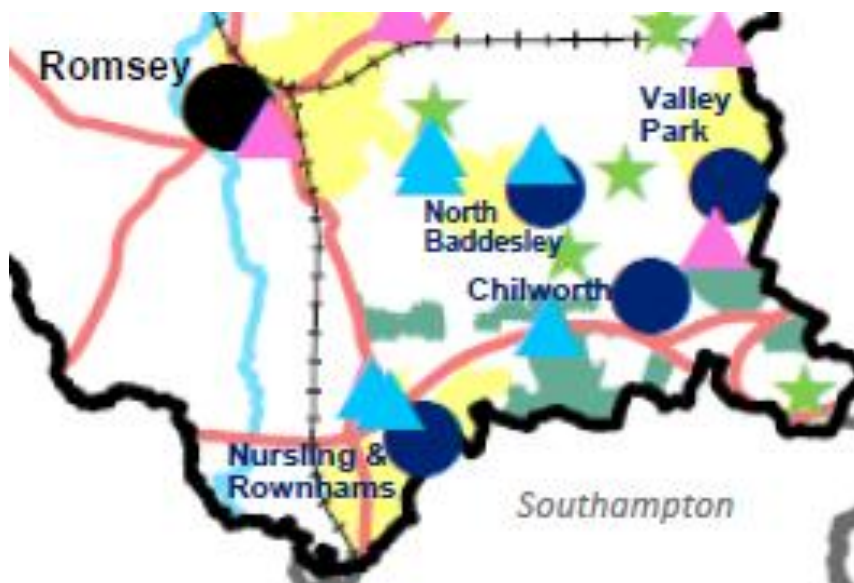
### **Issue 1- Significant disconnect between planning policy and the spatial strategy**

Chapter 3 describes the approach to the spatial strategy as:

*3.1 We are committed to ensuring the borough's growth is delivered in the most sustainable way which benefits our communities. The Local Plan's Objectives set out the overarching sustainable priorities to guide the Plan's policies. The spatial strategy sits alongside this by identifying how much, where and what sustainable development looks like for our communities in Test Valley.*

The over-riding opinion of the Parish Council, is that the high ideals and praiseworthy key objectives of the Draft Local Plan are not reflected in the actual spatial development proposals. Indeed, it seems to us there is a significant disconnect between the policy wording and what is actually being proposed on the ground over the next 16 years. There is a familiar 'business as usual' approach to the plan with the same few localities – including Nursling and Rownhams - across the borough being expected to take the vast majority of the proposed new development as in the current and previous Local Plans . This is illustrated in Figure 1 an extract from the Draft Local Plan showing the main spatial allocations in southern Test Valley.

**Figure 1 – The Draft Local Plan proposes that the great majority of new development is located in the south east corner of the borough between Romsey, Eastleigh and Southampton**



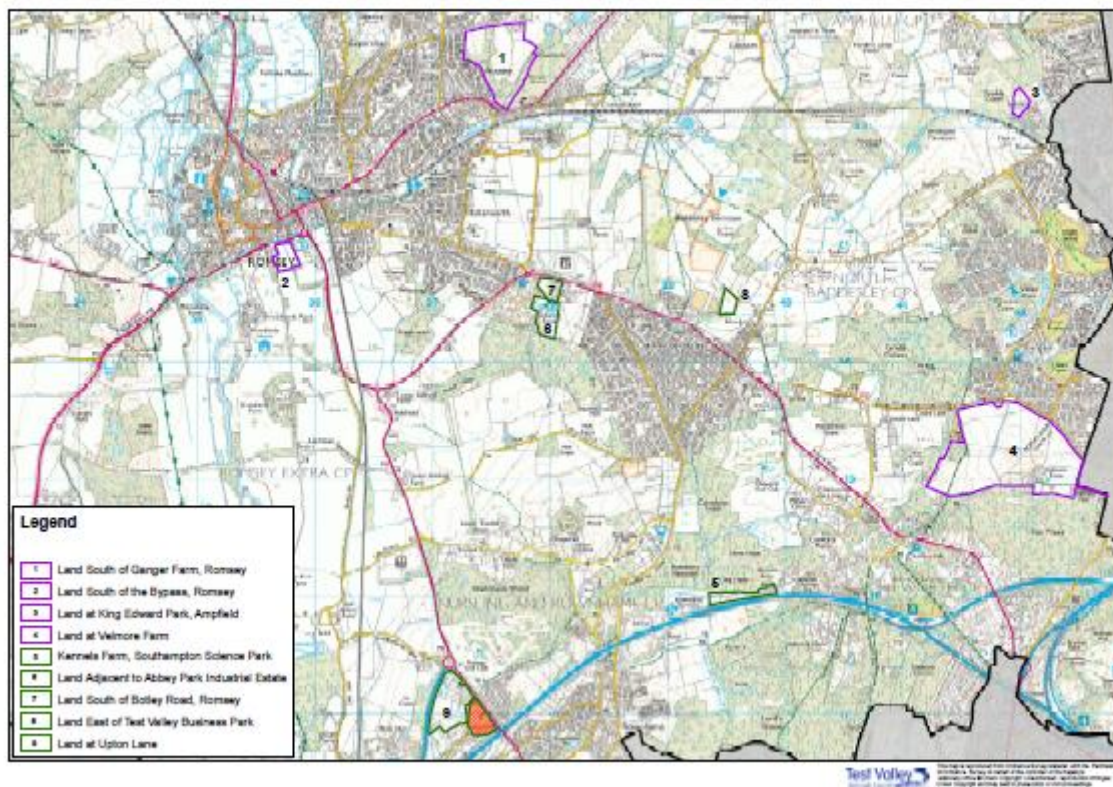
Far too little assessment has been made as to:

- whether these locations can support the scale of the proposed additional development and whether they have the necessary infrastructure especially as no significant new infrastructure seems to be proposed ;
- what the impacts of these allocations of land for new built development will have on local communities and the local environment.

For these reasons, it is our view that the proposed spatial strategy ultimately fails to deliver sustainable development because the scale of development in the locations proposed is not sustainable. Below we set out why we have come to this conclusion.

**Figure 2 – Proposed development site allocations in Southern Test Valley**

**FIGURE 4.12: PROPOSED SITE ALLOCATIONS AND STRATEGIC EMPLOYMENT SITES**



## **Issue 2 – Settlement hierarchy and proposed concentration of development is not sustainable**

Paragraph 2.68 says that development will be focussed in the most sustainable locations as using the 20-minute neighbourhood principles can help to reduce the need for travel and therefore its impacts, helping to make places more attractive for people to live in. This is a laudable aim, however viewed in a different perspective it amounts to cramming more

development and more people into places where there is already a high development density and significant stress on existing local services and infrastructure. We consider this issue in more detail in relation to our parish later.

Paragraph 3.14 says that the focus is to support an appropriate level of development at the largest range of sustainable settlements where there are key facilities. However, there are two corollaries of this approach. First, without any new services such as health and facilities such as shops and schools and infrastructure such as transport, more pressure is placed on already stressed services and infrastructure in the key settlements. Second, focussing most new development in key settlements will result in services and facilities in other settlements decline (if they haven't done so already).

However, this strategic approach doesn't seem to have been applied consistently across the borough. For example, development in the market town of Stockbridge although in tier 2 and with a full range of services and facilities is limited to being permitted provided that its size is appropriate to the scale and function of the local centre, it respects the local character of the town and it would not have a significant adverse impact on the vitality and viability of the local centre. No allocation for new development has been made for the next 16 years.

Paragraph 3.21 says that policies and decisions should support development that reflect local needs and identify opportunities for villages to grow and thrive. It goes on to say that national guidance recognises that people in rural areas face challenges in terms of housing supply and affordability and that new housing can be important for the sustainability of rural communities. There is some required development in rural villages, but this varies between a minimum requirement of 10 with the upper amount being 50 in one case only. Meanwhile, the vast bulk of new housing is being proposed in already congested areas.

Therefore the other obvious consequence of this spatial strategy approach of concentrated development is that little or no development is proposed in the rural villages which will exacerbate the current decline and closure of schools, post offices, village shops and pubs in those villages as houses are unaffordable to young families and there is little choice of housing. Residents in these villages will therefore have to transport their children to distant schools and travel to shop and for other services and amenities – hardly a sustainable 20-minute principle for them. It's a laudable aim for people to live so close to their work or other amenities, that they walk or cycle to them, but it's not at all realistic and the vast majority of people will still use their vehicles on an already very busy (and sometimes gridlocked) road system.

### Issue 3 - The spatial strategy for Nursling and Rownhams is not sustainable

Based on the latest 2021 census data, our parish currently has a population of 6,113<sup>1</sup> and a mean population density of 5.22/ha. Between 1951 and 1971, there were less than 700 people resident in the parish<sup>2</sup>. And so in the last 50 years the population has grown by 873%.

More recently, in 2011 at the previous census, our parish had a population of 5,137 in 2,181 households and a mean population density of 4.4/ha. There has therefore been a 19% increase in population between the two most recent census periods. And prior to the publication of the current Draft Local Plan, the population was predicted to increase to 6,950 by 2027<sup>3</sup> – a further increase of 14%.

In addition to the significant growth in homes, the parish has experienced major commercial and employment growth at Nursling Estate and Adanac Park and the major Aldi distribution centre off Brownhill Way.

All of this growth has occurred in a parish that covers just 1.86% of the total land area of the borough of Test Valley which has led to one of the highest populations densities in the borough at 5.22/ha compared to the borough-wide average of 2.10/ha.

Further growth is being proposed because Nursling and Rownhams is regarded as a Tier 2 settlement with key services and facilities. However, the reality is quite different as the following headlines illustrate:

- Health Facilities – There are no health centres, no GP surgeries and no dental practices located in the parish. Parish residents rely on having to travel to either Southampton or Romsey for health services and furthermore the health centre and NHS dental practice in Lordshill Southampton are both full and not accepting any new patients. Therefore, existing residents and all new residents are having to travel considerable distances to access basic health facilities.
- Schools – There are no secondary schools in the parish and our young people therefore travel to Romsey or Southampton for their secondary education. There are 2 primary schools but both are over-subscribed and cannot accommodate many existing children within catchment and therefore again our children have to travel to Romsey for education.

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<sup>1</sup> <https://nursling-and-rownhams.parish.uk>

<sup>2</sup> GB Historical GIS / University of Portsmouth, Nursling and Rownhams CP through time | Census tables with data for the Parish-level Unit, *A Vision of Britain through Time*. URL: <https://www.visionofbritain.org.uk/unit/10124438>

<sup>3</sup> <https://nursling-and-rownhams.parish.uk>

- Shops – There is only a single convenience store to serve an existing population of over 6,000 residents. There are no superstores within the parish but there are 2 superstores in adjacent Southampton but both are more than a 20 minute walk for many parish residents.
- Open Spaces – As of 2018, the Parish had an overall deficit in open space of 6.68ha with actual open space totalling 8.76ha against a requirement of 15.44ha. In other words there was a deficit of 43%. Since 2018, the parish population has grown to 6,113 from a 2018 population estimated at 5,147. Therefore the shortfall in open space provision has increased significantly.
- Public Transport – There are no railway stations in the parish and the nearest are in Romsey or Southampton. There is only one regular bus service that caters for this parish.

Therefore, despite being classified as a Tier 2 settlement the parish and its residents are seriously underserved in terms of the facilities and services that a community needs and relies on the proximity of Southampton City facilities, which are oversubscribed.

This then is the backcloth to our comments on the proposals for further development in the parish of Nursling and Rownhams in the Draft Local Plan. We have a local population growth of 19% and predicted to grow by another 14% and meanwhile no new facilities have been provided to support this massive population increase and therefore current facilities are oversubscribed and unavailable.

#### **Issue 4 - Unsustainable development proposals**

Against this backcloth, any new development proposed for the parish is going to result in still greater stresses and pressures on our already over-stretched services and facilities. The Sustainability Appraisals for the Strategic Housing and Employment Land Allocation Assessment (SHELAA)<sup>4</sup> states that for sites 385 and 394 land at Upton Lane: *“The site is relatively accessible to Nursling, which has a range of facilities, services, a regular bus service”*. Clearly there is a significant lack of understanding of the availability of services and facilities in the parish.

However this statement is then contradicted by another statement in the SHELAA that states that: *“The site is not well connected by public transport and is some distance from local services and amenities”*. This is one of many contradictory statements that we found between the Sustainability Appraisals for employment and housing for land at Upton Lane and between these and those for the adjacent Upton Triangle.

#### **Issue 4a - Proposed development is unsustainable as it is in the countryside**

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<sup>4</sup> Sustainability Appraisal Appendix IV Housing Site Appraisals and Appendix V Employment Site Appraisals

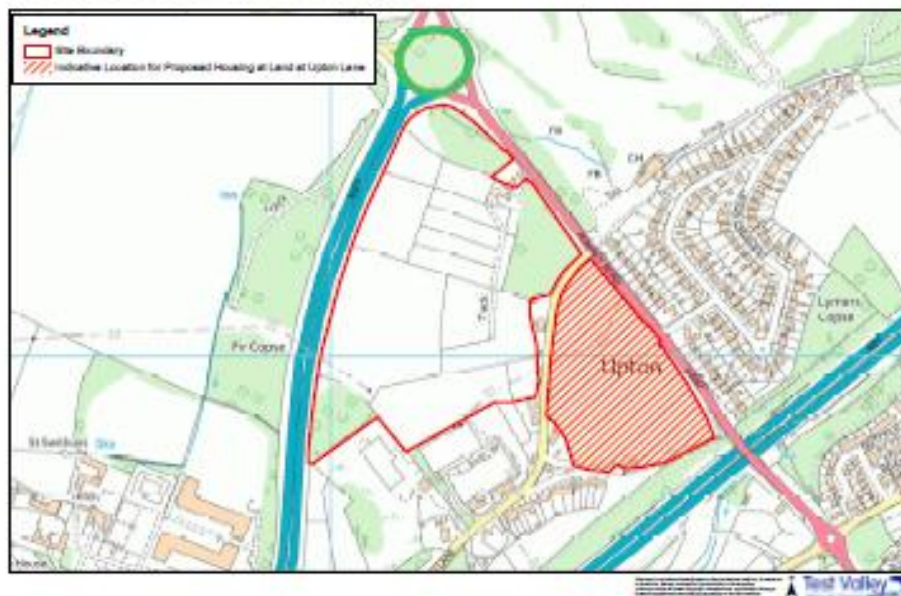


The two major proposals are both proposed to be located in the countryside on agricultural land off Upton Lane a narrow country lane linking Romsey Road and Station Road. Figure 3 illustrates the proposals and their locations.

**Figure 3 – Extract from the Draft Local Plan showing the proposals for development at Upton Lane**



**FIGURE 4.18: LAND AT UPTON LANE**



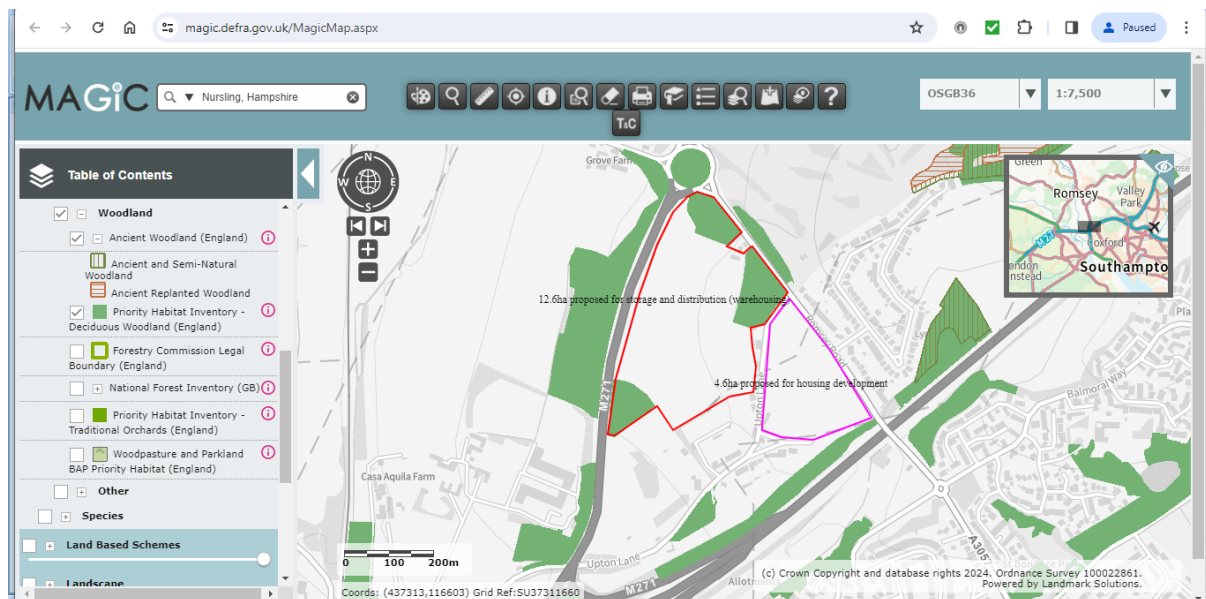
The Policy SA8 refers to a development of 8.5ha. However the combined areas of the two sites (12.6ha for land west of Upton Lane and 4.6ha for the land east of Upton Lane) is significantly greater than this at 17.2ha as can be seen from Figure 4 below as measured from Defra Magic mapping<sup>5</sup>. Therefore, we want to know why the Draft Local Plan is

<sup>5</sup> <https://magic.defra.gov.uk/MagicMap.aspx>



describing 8.5 ha of proposed development when in fact the allocated sites are over twice that size?

**Figure 4 – Location of the proposed development land allocations at Upton Lane**



The area proposed for this major development is currently outside of the settlement boundaries within the current Adopted Local Plan as shown in Figure 5. That means that the Council has effectively moved the settlement boundary to include the proposed development allocations and has therefore effectively massively shifted the policy goalposts. Indeed the Sustainability Appraisal for the site allocations acknowledges the poor location stating that: *“The site also relates poorly to the settlement boundary of Nursling and begins to sprawl development into the open countryside”*.

The land at Upton Lane is currently designated as countryside and therefore development at Upton Lane is currently restricted by Policy COM2 of the adopted Local Plan which states that:

***Policy COM2: Settlement Hierarchy***

*Within the boundaries of the settlements identified in the hierarchy (Table 7) and identified on inset maps 1 - 55 the principle of development and redevelopment will be permitted provided that it is appropriate to the other policies of the Revised Local Plan.*

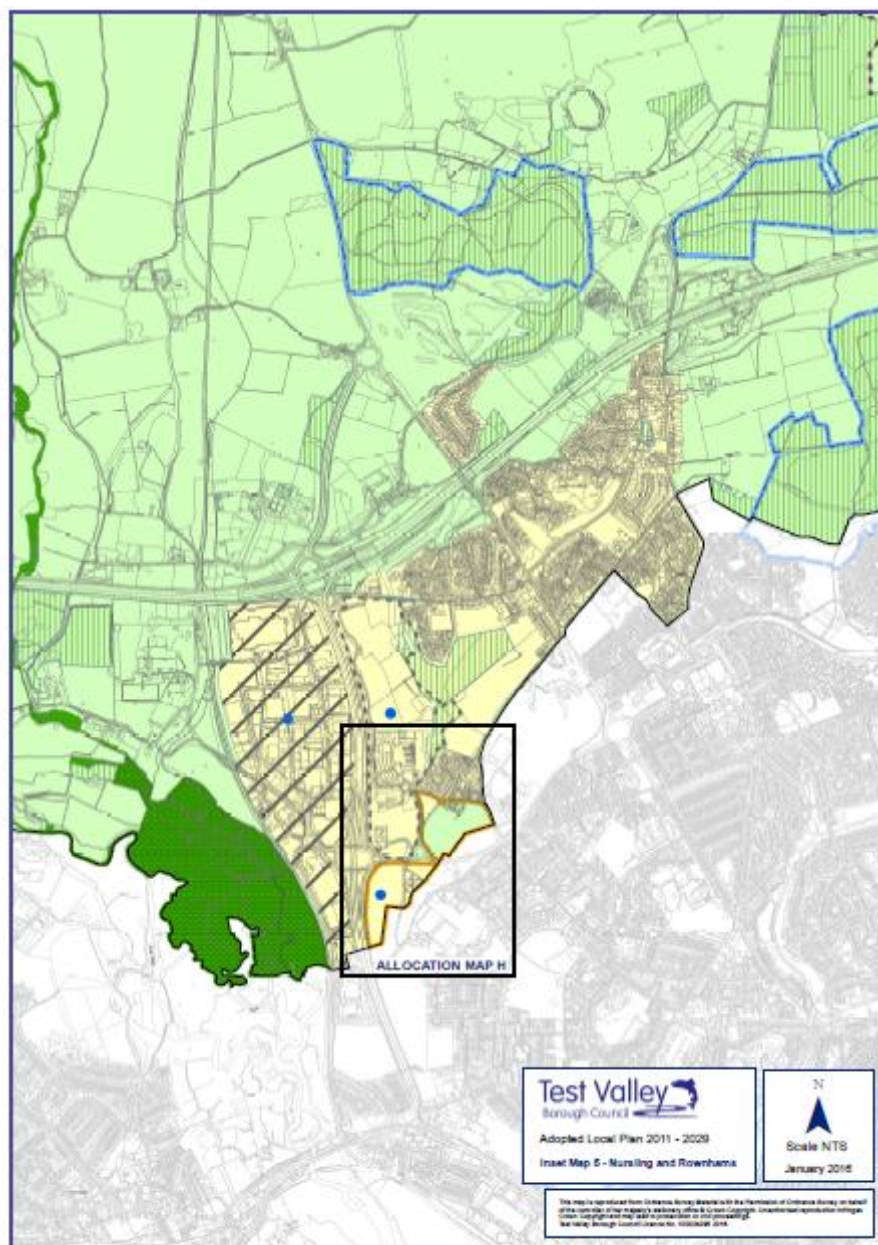
*Development outside the boundaries of settlements in the hierarchy (as identified on map 1 - 55) will only be permitted if:*

- a) it is appropriate in the countryside as set out in Revised Local Plan policy COM8-COM14, LE10, LE16- LE18; or*
- b) it is essential for the proposal to be located in the countryside.*

Based on the current adopted Local Plan therefore, any development proposals for land at Upton Lane would be outside the settlement and would only be considered for approval under exceptional circumstances. The character of this land has not changed – it is still countryside used for agriculture. And the land has not changed location – it must still therefore be considered to be outside the settlement boundary. So we need the Borough Council to tell us:

- what justification is there for moving the settlement boundary?
- what makes the proposed development acceptable in the countryside in future when it isn't currently acceptable?

**Figure 5 – Extract from the current adopted Local Plan showing land at Upton Lane is outside the settlement boundaries and in the wider countryside**



#### **Issue 4b - Proposed development is unsustainable because the access is unsuitable for the proposed scale of development**

The description of the proposed development is as follows:

*4.215 Land at Upton Lane comprises two land parcels located north of the M27 and the settlement of Nursling and Rownhams. A single allocation is proposed that will be comprehensively master planned to deliver a high-quality mixed-use development.*

*4.216 The site will be employment led providing the opportunity to deliver high quality employment development well located adjacent to the motorway network and the urban areas of Southampton and Eastleigh. The site has the potential to deliver approximately 8.5ha (30,000sqm) of employment land.*

*4.217 The location of the site makes it suitable for all range of employment uses with being adjacent to the M27 attractive for B8 storage and distribution employment uses. The site has potential to support some ancillary uses to support the main employment function including non-employment facilities to support on site businesses and employees.*

*4.218 The southern-eastern parcel is adjacent to Romsey Road and the existing residential development at Upton Crescent. Employment uses will be more sensitive in this location due to the relationship with adjacent properties in terms of character and amenity impact. A small amount of housing (of approximately 80 homes) could be appropriate on this part of the site to provide a comprehensive site-wide approach to ensure a well-planned and integrated development served by the necessary infrastructure.*

*4.219 The site is therefore primarily appropriate for employment development and ancillary uses serving the main employment use. However, subject to noise constraints a small proportion of residential development on the eastern site boundary may be appropriate. A noise assessment will be required to assess the potential suitability for residential development in this location.*

*4.221 The site access is proposed off the Romsey Road and Upton Lane. There may be the need for offsite junction improvements that will be confirmed through site-specific transport assessment.*

It is difficult to think of a proposed employment site on the scale of that proposed (17.2ha in total) that has to be accessed by a country lane and via a residential area. No other major employment site in Nursling and Rownhams has to be accessed via a country lane through a residential area. The Nursling Estate and Adanac Park can both be accessed directly from Junction 1 of the M271. However, despite its location between the M27 and the M271, the proposed allocations at Upton Lane cannot be accessed directly from either motorway and the chances of National Highways agreeing to new access junctions from the motorway



network are virtually zero given the relevant current guidance<sup>6</sup>. Therefore, vehicles will need to leave the motorway network and travel on the local road network through the villages of Nursling and Rownhams to access the site. Figures 6a to 6d Show the current access to Upton Lane from Romsey Road, immediately opposite residential properties on Romsey Road and immediately opposite the entrance to the Romsey Golf Club.

**Figure 6a – The approach to the junction with Upton Lane from Romsey Road. The entrance to Romsey Golf Course is on the right.**



**Figure 6b – The entrance to Upton Lane from Romsey Road showing important deciduous woodland Priority Habitat.**



<sup>6</sup> **Planning for the future**. A guide to working with National Highways on planning matters October 2023. National Highways.



**Figure 6c – The first of many residential properties on Upton Lane. The proposed major employment site can be viewed through the garden of these homes and any access to this land will therefore directly impact these residents.**



**Figure 6d – The triangle of land between Upton lane, Romsey Road and the M27 proposed for either employment or residential use. How will this be accessed from Upton Lane and how will that access relate to the access for the wider employment site on the opposite side of the lane?**



How are large Heavy Goods Vehicles (HGV's) required to service the proposed storage and distribution proposed for this major employment site, going to be able to access the site? This is very unclear. They would currently need to either:

- come off the M271 north and go right around the roundabout with Romsey Road and then take a sharp right turn across oncoming traffic on Romsey Road before turning into Upton Lane (whose junction isn't wide enough to accommodate a HGV turning right);
- come south down the A3057 from Romsey and turn left at the roundabout before taking a sharp right turn across oncoming traffic on Romsey Road before turning into Upton Lane (whose junction isn't wide enough to accommodate a HGV turning right);
- come off the M271 motorway at Junction 1 and via Brownhill Way and the Romsey Road through the centre of Rownhams and Nursling and then turn left into Upton Lane (whose junction isn't wide enough to accommodate a HGV turning left).

But once HGV vehicles get into Upton Lane, how will they then access the proposed employment and land either side of the lane? Would there need to be a second new major junction/roundabout only a matter of a few metres from that which will be needed at the Romsey Road/Upton Lane access? And what additional levels of noise and vibration and air pollution will these junctions result in?

Traffic already queues extensively at peak times at the Upton Lane/Romsey Road junction. Adding significantly more traffic to this junction will result in increasing the tailbacks of traffic on both Romsey Road and Upton Lane. This will also result in increased air pollution which is considered further below.

DfT Policy paper<sup>7</sup> Strategic road network and the delivery of sustainable development Updated 23 December 2022, states that:

*26. The NPPF prescribes that transport issues should be considered from the earliest stages of plan-making and in development proposals so that sustainable transport can be promoted. In relation to the preparation of local plans and spatial development strategies, the government expects that the relevant authorities will engage with the company<sup>8</sup> from the outset of this process, to understand the interaction between land use designations and the impacts on road safety and future performance of the SRN. The involvement of the company will ensure that the strategic transport evidence base will provide a robust assessment of any positive and negative impacts on the SRN and inform a transport strategy and the Strategic Environmental Assessment (SEA) for the study area that aligns with the safe operation and long-term integrity of the SRN.*

National Highways planning guidance states that

<sup>7</sup> <https://www.gov.uk/government/publications/strategic-road-network-and-the-delivery-of-sustainable-development/strategic-road-network-and-the-delivery-of-sustainable-development>

<sup>8</sup> <https://nationalhighways.co.uk/our-roads/planning-and-the-strategic-road-network-in-england/>



63. When a local plan or spatial development strategy proposes site-specific allocations, we will want to ensure that all relevant transport impacts and requirements are considered. To this end, we will work with plan-making authorities to:

- identify the impact that the proposed allocations are likely to have on the SRN on an individual and, insofar as is necessary, a cumulative basis, factoring in the demands arising from development planned in adjacent authorities where appropriate
- assess the impact of the SRN on the development potential of sites that are proposed to be allocated (for example, vehicle emissions, light pollution and noise)
- consider travel plan, travel demand and off-network improvements
- as necessary, identify the infrastructure requirements and delivery of strategic infrastructure for the proposed allocations

64. Whilst allocating land for particular uses is a matter ultimately for plan-making authorities, we will provide comment on the suitability of locations where there is potential impact on the SRN, including from a safety, congestion, amenity and carbon emissions perspective. Certain allocations should also recognise the importance of providing and retaining adequate provision of lorry parking facilities, particularly in relation to proposals for new or expanded goods distribution centres and roadside facilities.

We can see no consultation responses from National Highways in relation to the proposed development allocations at Upton Lane, Nursling and we do not know therefore whether it has been consulted about the proposed land allocations at Upton Lane.

#### **Issue 4c - Proposed development is unsustainable due to likely pollution impacts**

Pollution from light, noise and vibration and disturbance and to air quality – The draft Local Plan identifies the need for new development to avoid causing pollution and states that:

*Pollution 5.190 This policy aims to protect existing and future residents, businesses, biodiversity and the environment from the effects of pollution. This includes from existing sources of pollution and/or from pollution associated with new development. To be environmentally sustainable, development should be designed to prevent, or if not practical, minimise pollution and will incorporate measures to mitigate pollution impacts to an acceptable level. Wherever possible, proposals should also seek to enhance the local environment and environmental conditions, including air and water quality.*

Given the modern 24 hour a day 7 day week economy, and based on observations of the patterns of use of the Nursling Estate with its predominantly B8 storage and distribution use, HGV's can be expected to be requiring access to the proposed employment land all through each day (including weekends) and all through each night. The impacts of these lorry movements would therefore be to totally disturb this current peaceful residential hamlet resulting in residents in Upton Lane and on Romsey Road having no respite.

Furthermore, all the additional vehicular traffic generated by development of this scale with associated new road junctions resulting in motor vehicles being stacked waiting to enter those junctions, will inevitably increase local concentrations of air pollutants with adverse effects for local residents. This is indeed recognised in the site Sustainability Appraisal that states that: *“There is potential for additional traffic associated with development to have an impact on air quality at AQMA outside the Borough, specifically, at the junction of the A3057 and A35, south of Nursling. The effect on air quality would need to be explored further in terms of potential cumulative effects”*.

Finally, Upton Lane is a country lane with no street lighting. The use of this lane as the sole access into and out of the proposed allocations both sides of Upton Lane implies that significant artificial lighting will be required on Upton Lane itself and on the access roads from Upton Lane to serve the proposed development. Judging by the high levels of lighting required in connection with the Nursling Estate and Adanac Park this will turn an area of dark countryside into a brightly lit urbanised area totally changing the character and quality of the area at night as well as during the daytime. The Draft Local Plan states that:

*Lighting - 5.204 This policy aims to prevent and minimise light spillage, light pollution, glare and sky glow, in order to maintain and enhance the intrinsic darkness of the skies and landscape, for environmental, visual amenity and biodiversity reasons. The policy sets out principles that will be applied to development and lighting proposals across the Borough, with specific provisions for the North Wessex Downs National Landscape and its setting.*

#### **Issue 4d - Proposed development is unsustainable due to likely impacts on landscape character, biodiversity and residential amenity**

Harm to landscape character and biodiversity and overall loss of residential amenity – Taken together, the scale of the development proposed, the way in which it is proposed to be accessed and the polluting effects of the proposed development and loss of and damage to landscape features such as woodland and trees, will have a significant adverse effect on the amenity of existing local residents on Upton Lane and Romsey Road in particular.

The Draft Local Plan states that:

*Amenity - 5.212 This policy seeks to protect the amenity of residents and occupiers and the amenity of neighbouring or nearby uses. Development will be assessed in terms of any impact or potential future impact on residential amenity. This includes the amenity of existing residents living on site or near to an application site and the amenity of potential future occupiers.*

*5.213 The NPPF requires that planning policies and decisions ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.*

Loss of amenity is inextricably linked to landscape and visual impact and to the effects of the proposed development in the context of current character of the area. The Draft Local Plan states that:

*5.181 Landscape quality and specific landscape features should be maintained and enhanced, including views, historic and other landscape features or topography, watercourses, water meadows, distinctive skylines, trees and hedges. Many smaller, individual landscape features can combine to establish the character and identity of an area. These elements may provide recognisable boundaries to settlements and help establish the identity of an area, contributing to landscape character and value. They should be protected and enhanced, as their loss, either individually or cumulatively, could have a potential impact on the immediate and wider character of the landscape.*

We cannot see how development of the scale and extent proposed and within what is currently an area of open countryside, could possibly be accommodated without significant adverse effects on local landscape character and consequently on residential amenity.

The proposed land allocation to the west of Upton Lane includes extensive areas of important lowland deciduous woodland – a Priority Habitat under the (recently strengthened) Natural Environment and Rural Communities (NERC) Act, 2016 (as amended). These woodlands (which can be seen clearly in Figure 4 above) are likely to have once been a part of the larger Nightingale Woods to the north. They are renowned locally for their profusion of bluebells each spring. We are very concerned that the proposed land allocation will result in loss of or damage to these important woodlands and further isolation and fragmentation of these habitats and their animal communities.

Overhead power lines – The proposed land allocation to the west of Upton Lane has overhead power cable bisecting it. It is not clear how proposed development could be accommodated without having an effect on the safety zone of the power lines – especially if this is to be employment related development that results in large warehouse type buildings or the stacking of containers.

#### **Issue 5 - Overall the development allocations are contrary to policy**

Based on our above observations and assessments, when considered in the context of the policy framework set out in the Draft Local Plan itself, it is our view that the proposed development allocations on land west and east of Upton Lane as proposed in draft policy SA8 are contrary to many of the draft policies in the Draft Local Plan. It is for this basic reason that we believe that there is a significant disconnect between the policy wording and what is actually being proposed on the ground in our Parish over the next 16 years. Table 1 below summarises the draft policies that we believe the allocations in Draft Policy does not or cannot comply with given its extent scale and location. This is not sustainable development. Nor is it in accordance with the key objectives of the Draft Local Plan. The

impact on our community would be more buildings, more residents, more traffic , even less countryside and even less available amenities relative to population .The proposed allocations at Upton Lane do not pass the test of the Councils own Draft Local Policies.

Indeed the Councils own assessment of the proposed allocation of land east of Upton Lane for housing development in the Sustainability Appraisal concluded that it was unacceptable : *The site is relatively accessible to Nursling, which has a range of facilities, services, a regular bus service. The site is bounded by the M27 and A3057 and is significantly affected by road noise which makes this location inappropriate for residential development. Mitigation would need to be considered. The site also relates poorly to the settlement boundary of Nursling and begins to sprawl development into the open countryside.*

**Table 1 – Summary of the Parish Councils reasons for objecting to Draft Policy SA8 Land at Upton Lane**

Summary reasons for our objection	Relevant Draft Local Plan policies
The proposed development allocations are in land that is currently designated as countryside and is outside of the currently defined settlement boundaries	The Council has effectively moved the goalposts to stretch the settlement boundary to include land at Upton Lane
Unacceptable access and lack of appropriate and necessary transport infrastructure and significant adverse effects on local roads and existing traffic patterns and existing road users.	Policy TR1: Active and Sustainable Travel Policy TR2: Assessing Transport Impacts
Significant and unacceptable pollution from extensive artificial lighting, traffic and operational noise and vibration and disturbance and adverse effects on air quality	Policy ENV5: Pollution Policy ENV6: Lighting
Significant loss of countryside and trees and consequential harm to landscape character and overall loss of residential amenity	Policy ENV3: Landscape Character Policy BIO1: Conservation and Enhancement of Biodiversity and Geological Interest Policy BIO5: Trees and Hedgerows Policy ENV7: Amenity Policy DES1: Delivery of Sustainable and High-Quality Design

## Issue 6 - No cumulative impact assessment

Cursory assessments of the potential effects of the two proposed land allocations at Upton Lane Nursling have been made through the Strategic Housing and Employment Land

Allocation Assessments (SHELAA) and the related site allocation Sustainability Appraisals 385 (Land at Upton Lane) and 394 (Upton Triangle). However, no cumulative impact assessment of the two allocations in combination has ever been made and therefore the combined effects have not been considered in putting forward the Draft Local Plan. There will clearly be significant cumulative impacts from traffic, noise, air pollution, loss of countryside, loss of landscape character and ecology and yet in advancing these two land allocations side by side, the Council has not considered these cumulative impacts.

### **Issue 7 - No Local Gaps**

The Parish Council wishes to register its significant disappointment that yet again no Local Gaps have been proposed around our parish. Policy ENV4 identifies Local Gaps in southern Test Valley as follows:

- Ampfield – Valley Park (see inset maps 1, 8 and 9);
- North Baddesley – Chilworth (see inset maps 3 and 6);
- North Baddesley – Valley Park (see inset map 3);
- Romsey – North Baddesley (see inset map 3); and
- Southampton – Eastleigh (see inset map 6).

A Local Gaps Study (Stephenson Halliday, 2023) has reviewed the local gaps identified in the adopted Local Plan 2016 (through Policy E3) and policy approach. And yet despite the fact that Nursling and Rownhams is immediately adjacent to the built up areas of Southampton to the east and Totton to the south and west, no Local Gaps have been proposed to seek to retain the character and separation of our parish from becoming part of a wider urban sprawl in this part of South Hampshire. The Local Gaps Study recognises that Local Gaps can also offer potential green infrastructure opportunities and may provide for wildlife corridors, whilst also offering health and wellbeing benefits for communities and access to green spaces and the countryside. Our parish is not set to get any of these benefits.

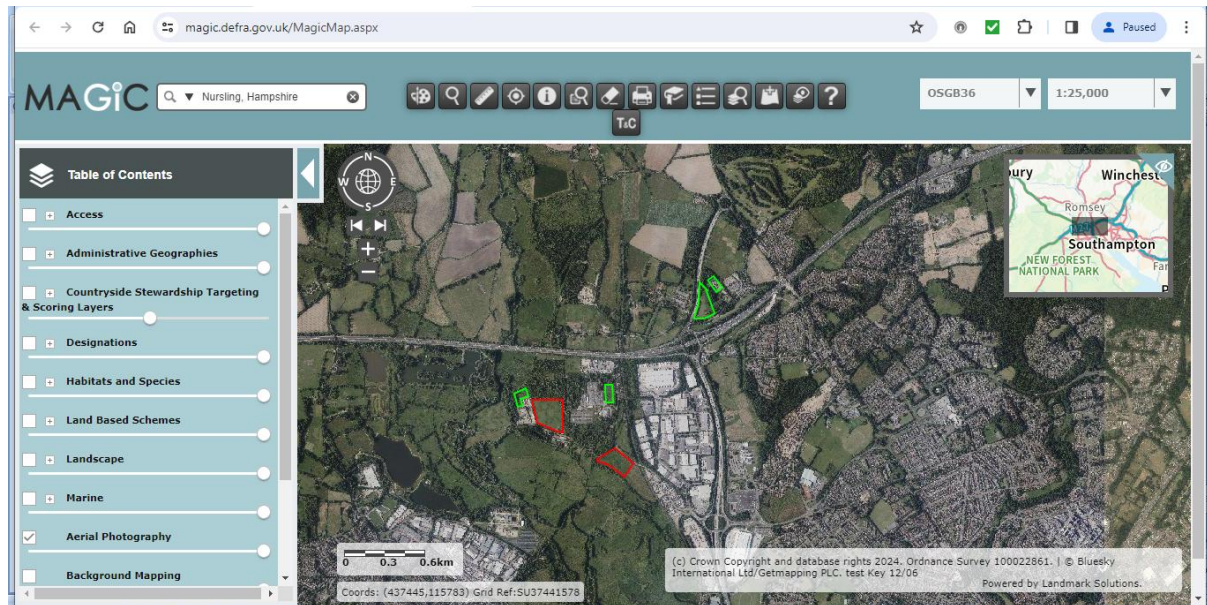
At the same time, the Sustainability Appraisals for the proposed land allocations at Upton Lane states that the: *“Site is adjacent to the settlement boundary of Nursling and Rownhams but north of the M27 and has some impact on reducing the settlement gap between Nursling and Rownhams and Romsey”*. Why have no Local Gaps been proposed for our parish and why simultaneously is development being proposed that is recognised as reducing the gaps between our settlement and those adjacent?

### **Issue 8 - Renewable and low carbon energy**

The Parish Council fully supports the need for greener and more renewable forms of energy both to provide a reliable energy source and to reduce greenhouse gas emissions that are a major factor in climate change. However, we are also concerned about one of the major spin offs from the renewable energy business that is having significant adverse effects in our countryside and our communities. Nursling and Rownhams has more Battery Energy

Storage Sites (BESS) than any other parish in Test Valley and probably more than all the remainder of Test Valley parishes combined. Table 2 summarises the submitted planning applications in Nursling and Rownhams for BESS showing those which have been constructed and are operational and those under construction. Figure 7 shows the location of the approved (green outline) and proposed (red outline) BESS sites.

**Figure 7 – Location of approved (green) and proposed (red) Battery Energy Storage Sites in Nursling and Rownhams**



**Table 2 – Planning Applications for Battery Energy Storage in Nursling**

Planning application reference and location	Number of battery units applied for	No. of battery units installed	Planning decision	Constructed and operating?
16/01654/FULLS Upton Lane, Nursling	4	10	Approved with subsequent amendments	Yes
17/01205/FULLS Mill Lane, Nursling	17	0	Application withdrawn	No
18/01303/FULLS Station Road, Nursling	25	15	Approved and subsequent amendments approved to reduce the number of batteries needed	Yes
19/02772/FULLS Mill Lane, Nursling	20	0	Approved	No – under construction
21/02799/FULLS Upton Lane,	28	0	Approved	No



Nursling				
23/02942/FULLS	48	0	Current Application not yet determined	No
. 23/03055/FULLS	36	0	Current Application not yet determined	No
<b>Total No. of Batteries Applied For</b>	<b>157</b>			
<b>Total No. of Batteries Approved</b>	<b>73</b>			
<b>Total No. of Batteries Installed</b>		<b>25</b>		

A total of 73 battery energy storage facilities have been approved in Nursling – but only 25 built. This tells us that there is already more than enough approvals to meet demand and further batteries are not required and cannot be justified. Yet recent planning applications are seeking permission for a further 36 units (application ref. 23/03055/FULLS) and 48 units (application ref.23/02942/FULLS). At the current rate, Nursling and Rownhams will have to be re-named as ‘Batteryville’ when every open field is full of storage batteries.

Against this background, we totally support Policy CL5: Renewable and Low Carbon Energy that seeks to control and restrict the development of facilities such as BESS. But like any other policy, such a policy can only be effective if the Council has the courage to apply it and to say ‘no’ to the tide of planning applications for such facilities washing across our parish.