

## **Valley Park Parish Council Response to the revised Regulation 18 of the draft Local Plan 2042**

Valley Park Parish Council welcomes the opportunity to comment to the revised Regulation 18 of the draft Local Plan 2042. There are two proposed sites which will impact upon Valley Park (Velmore Farm and Flexford Road).

- The Regulation 18 Plan identifies that Andover and Romsey stand out as the most sustainable settlements and are given Tier 1 status. It is acknowledged that Tier 2 is the next sustainable location. However, it is not as good as Tier 1. Despite this, **Velmore Farm** takes the brunt of housing with 1,070 houses allocated on the site which is only equalled by an allocation of this amount in Halterworth, Romsey, Tier 1. The amount of housing allocated on the site should be reduced to allow for its less sustainable location, otherwise the settlement hierarchy is of no value in expressing where best to put development.
- Part of the **Velmore Farm** site is affected by flooding and identified as falling within Flood Zones 2 and 3. It is also subject to surface water flooding. No strategic flood risk assessment appears to have been undertaken. Alternative development options should be considered, and a Sequential Test should be applied.
- Severe surface water flooding highly impacts areas of **Flexford Road**, close to the Flexford Bridge.
- **Velmore Farm** and **Flexford Road** proposed sites affect the River Itchen Special Area of Conservation, which is vulnerable to both nitrogen and phosphorous concentrations from foul water. Phosphorous is more difficult and expensive to remove from wastewater than nitrates. The Habitats Regulations Assessment should acknowledge this when screening the development. Furthermore, it is not clear whether a development of the magnitude proposed is deliverable given this constraint.
- The area suffers from significant traffic congestion at peak times and especially when the M3/M27 is congested. No proper evaluation has been made of the effect of this development in combination with other developments on the transport network. This should have been assessed. This is all the more when it will also have a strong bearing on air quality which in turn can affect human health and sensitive ecological habitats.
- The **Velmore Farm** site allocation acknowledges that there are constraints affecting this site e.g., woodland ecology, archaeology, pylons and pipelines all of which will affect the quantum of development and deliverability. This should have been properly assessed before the land was allocated. The requirement of Biodiversity Net Gain may also impact on the quantum of development. No analysis has been provided.

- The **Velmore Farm** site falls within a Local Gap which was originally allocated to prevent the coalescence of Valley Park, Chilworth and North Baddeley. This has strong public support which has been ignored by the allocation.
- Currently, the Local Gap is between Chilworth and Eastleigh and includes Hut Wood and the fields of **Velmore Farm** up to Templars Way. If the local gap is kept at the Chilworth end of the site, South, then it is between Chilworth and the Chilworth new housing. It must be between Chilworth and Eastleigh that is Valley Park School Lane. This also allows the open green space if at the North/North East end to contribute to the Local Gap and is more accessible by the majority of the population.
- The policy refers to development set back along Templars Way and Castle Lane, which is supported but the policy should be more specific and should provide for substantial open space and vegetative screening to enhance the setting of the proposed development and allow it to better integrate into the landscape.
- The **Flexford Road** site also breaches the Ampfield and Valley Park Local Gap.
- Currently, **Flexford Road** has no footpath and cycle way. There is very limited public transport along this road. Infrastructure would need to be implemented to gain safe routes for pedestrians and cyclists to access schooling and leisure facilities.
- Valley Park suffers from a deficit of public open space. There are no allotments nor is there a burial ground. This deficit should be compensated through the development.