# **Appleshaw Parish Council**

### TVBC Draft Local Plan (DLP) - June 2025

## Revised Regulation 18 Public Consultation Response (para 32 added 1 Sep 2025)

We object to the inclusion of **NA19** (35 houses at Eastville) and **NA16** (SHELAA reference 464 for 60 houses at Fyfield Lane and generally) in the latest Borough Plan for the following reasons, especially the lack of evidence on TVBC's part that these areas have been properly assessed for suitability for development. We do not reject all development by any means but want to ensure this parish grows proportionately and that any growth is well-supported.

Unless specified, all the comments below relate to both NA16 and NA19.

## TVBC Infrastructure Delivery Plan (IDP) - June 2025

**IDP page 5**: five evidence-based documents to inform the Site Selection Process are discussed. No links to them are provided in the document, so the following are the latest versions we can find. All are dated early 2024, i.e. before it was decided to include NA16 and NA19 in the DLP, and a, b, and c exclude the sites specifically:

- a. <u>Habitats Regulations Assessment</u> January 2024 report by AECOM Infrastructure & Environment UK Limited
- b. Water Cycle Study February 2024 report by Royal Haskoning DHV
- c. Viability Study January 2024 report by BNP Paribas Real Estate
- d. Transport Assessment and Modelling January 2024 report by Ridge & Partners LLP
- e. <u>Strategic Flood Risk Assessment</u> August 2023 report 'Partnership for South Hampshire Level 1, Part 2 TVBC' report by AECOM Limited

To be credible, TVBC evidence-based documents must include an up-to-date assessment of all proposed sites. We cannot find evidence to support the inclusion of NA16 and NA19.

#### National Planning Policy Framework, December 2024:

82. In rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs . . .

With no recent housing needs survey in place, what information is relied on to inform the decision to add a potential 400 people to the parish in the next 15 years?

Appleshaw's population is set to be 595 in 2026 (TVBC Parish Profile 2024) and this decision would nearly double that, putting huge strain on our limited and ageing infrastructure which is struggling to support the dwellings we have now, as under.

#### Para 3.29 of the DLP states

'A local housing need assessment should be undertaken . . . to inform the housing requirement figure for the plan area'.

Is this a mistake? Should that not have been done before the draft was circulated for consultation?

**Appleshaw and Redenham's Village Design Statement** is published by TVBC as a supplementary planning document and includes:

Appleshaw Parish Council response
TVBC Draft Local Plan – Revised Regulation 18 Consultation July 2025
(Para 32 added 1 Sep 25)

New development should be of a scale in keeping with the character of the villages. Future planning proposals for the area should respect the features of the surrounding landscape and retain views from local rights of way.

Outside of the settlement boundary line is defined as 'countryside' where development is restricted by planning policies to development for which a countryside location is essential or as an exception to the general policy of restraint.

The rural and unspoilt landscape within the parish should be respected.

These principles are current and we will fight to retain them. Rural areas are disproportionately affected in this update of the Local Plan with little evidence to back up the proposals.

## WATER:

TVBC evidence is based on the <u>Water Cycle Study</u> - February 2024 report by Royal Haskoning DHV. This report specifically does not cover sites NA16 and NA19 so there is no evidence on this subject to support their inclusion.

- This important subject is not mentioned at all in the IDP for NA19, and hardly so in NA16.
   This should be corrected in the light of para 3 below, and the response to para 2 when it is received.
- 2. Does Southern Water (SW) believe it can supply enough water to service a lot more housing in this area? According to SW's Management Plan, all our water is sourced from groundwater and although the aspiration is to pipe it in from other areas if needed (i.e. Thames), there is only ever a finite amount if it doesn't rain. For more evidence of how seriously this subject should be taken, see the recent National Drought Group meeting outputs and the Water Minister's comment

'We face a growing water shortage in the next decade.'

- 3. Janet Wright's paper 'Concerns relating to the Pillhill Brook Catchment' is our evidence that the sites should be taken out of the Plan on the Water issue alone. We are very close to the Pillhill Brook communities. It sets out the scientific facts and consequences of extracting large amounts of groundwater from the area to the detriment of the aquifers and other underground sources, and we fully support the paper.
- 4. IDP page 30:
  - 'The Water Company Area for Southern Water (SW) is designated by the Environment Agency as an area of 'serious water stress'. This means that demand can outstrip supply, especially during a drought.'
- 5. The current daily water allowance per person is an average of 130 litres. **That means an extra 4,200 litres a day for NA19 and 7,200 a** <u>day for the 60 houses in NA16</u>. That is a lot to find for an area of *serious water stress* with little present evidence that it is a viable proposition.
- 6. The Environment Agency's response to Regulation 18 consultation stage 2 (April 2024) was as below were the suggestions taken up?
  - ... WCSs should clearly outline how the proposed plan may affect the water environment and start to suggest what measures will be needed. Whilst this report may contain a lot of information the conclusions don't really address if the plan is likely to have an impact on the water environment or not.

There is no mention of the current issues Southern Water have had with high Ground Water levels resulting in infiltration into the sewer network, the study should explore if new developments will contribute to that problem or not.

#### Will TVBC source a Water Cycle Study which includes NA16 and NA19?

## SEWAGE (NA19):

- 7. Adding 35 houses at Eastville to a Victorian sewer network is counter-intuitive given Appleshaw and Redenham's history of groundwater leaking into the pipeline when under stress. The pipework needs replacing, which has been acknowledged to be too expensive, and SW's workaround of relining pipes and private laterals has yet to be completed and tested in these villages.
- 8. From the past 30 years' experience, SW would only want to do a work around rather than invest enough to make everything work properly, so it is likely that a block of 35 extra houses would overwhelm the fragile pipework and tankers would have to be employed once again to ferry away the excess water. This is highly disruptive for parishioners and the infrastructure of the villages: we are so close to becoming tanker-free now. SW has therefore been asked for an assessment of the effect on their system of this development.

## **SEWAGE (NA16):**

9. Deep 12ft circumference soakaways were buried in the field in 1994 for the small development of five properties at the old Pinehurst Kennels in Fyfield Lane when the original sewage arrangement became untenable. There would be huge costs to the householders should any development take place in this area to compromise the soakaways with no current mains sewage arrangements.

## **ROADS, HIGHWAYS AND TRANSPORT:**

TVBC evidence is based on <u>Transport Assessment and Modelling</u> – January 2024 report by Ridge & Partners LLP. **This report was published before the decision to include NA16 and NA19.** IDP page 20 states

'The outcomes of the transport modelling work showed no significant issues in terms of impact on the transport network'.

10. We disagree with this statement based on current traffic movements.

Will TVBC source a Transport Assessment and Modelling report with up-to-date data on the use of the A342 between Ludgershall and Weyhill?

#### IDP page 136 - NA19 Highways:

- 11. The proposed entrance and exit to the site is not viable. It is over a footpath which is used morning and afternoon in term times by primary school children at Appleshaw St Peter's School. Parents use the lane to park their cars whilst waiting and the sight line for emerging vehicles from the proposed access is compromised at those times of the day.
- 12. HGVs and shop customers come and go at all times to the Pilgrim's Europe meat factory which is just above the school. Negotiating the parked cars and pedestrians during these periods can be challenging.
- 13. The proposed access is right next to the school's playing field.
- 14. There is also a working farm just beyond with large farm machinery using the road regularly.
- 15. The lane can be used only in one direction at a time when large vehicles are on the road.
- 16. The addition of a block of 35 houses with say 4 people in each could mean the addition of 70 cars to the village totals.

# The infrastructure requirements (IDP page 136 Highways and Education) for NA19 are deficient:

- 17. Work will not be confined to 'new access will be required off Eastville' as stated to make this comparatively large development a viable proposition. The lane would have to be transformed, altering its rural nature.
- 18. There is no mention of the water, sewage or power infrastructure which would have to be enhanced to support the development.
- 19. Have the Governors of Appleshaw St Peter's Primary School been approached to confirm the proximity of the access to the school is not a problem for them?
- 20. **IDP page 10**:

'Several site allocations are proposed at rural settlements, where facilities exist to support daily needs'.

What information has been relied upon to include NA19 in this statement?

### IDP page 87 - NA16 Highways:

- 21. **Dauntsey Drove**: the lane is single track, and the staggered crossroads under the railway bridge at the bottom of Dauntsey Drove has steep banks with part brick walling: the lane cannot be widened without significant impact on the rural nature of the area. The area under the bridge is prone to significant flooding after heavy rain with unsuccessful attempts over the years to correct this.
- 22. **Fyfield Lane:** similarly, this lane is narrow at its approach to the railway bridge on the east side. As for Dauntsey Drove, the area under the bridge collects a huge amount of water after heavy rain making both impassable on occasions.
- 23. The proposal as stated is woolly for this particular site we assume it is covered by 'Other site-specific improvements to the local highway network . . .' An additional 60 houses and a potential 120 cars extra cars will add a significantly higher risk to the entry and access point(s) and we would like to see more detail in the IDP, including on the sewage arrangements at serial 8 above. The addition of this site would involve considerably more change to infrastructure than is forecast, not least to rectify the drainage problems under the two bridges.

#### IDP page 19 - Highways NA16 and NA19

'Andover is identified as a Primary Destination within the Primary Road Network (the only town in the Borough to be identified as such)', and 'Network Rail identify Andover as being a Priority 1 station for improvements . . .', both of which indicate Andover is a significant destination.

- 24. Much of the traffic entering and leaving the town is via the A342 past the C77 crossroads and a small crossroads at Privet Lane, which is close to the accident black spot at the Perham Down junction. We believe this road is not given enough attention in your delivery plan. The road is significant for all our rural villages and yet because it is not termed a trunk road, it is missing from the statement:
  - 'Within Test Valley, the A303, A34, M3 and M27 contribute to the strategic road network (SRN)'. We believe the A342 does contribute to the SRN.
- 25. Appleshaw and Redenham are regularly used as 'rat runs': the long, straight village road and the Ragged Appleshaw road can become overwhelmed with speeding traffic when the A342 is blocked by an accident or road works. The road is the footpath in most of the villages, with near-misses reported frequently. More traffic is to be discouraged. The

- Appleshaw Road Safety Group has worked hard on this subject and are contributing their expertise to these objections.
- 26. Urgent work is already required to make the journey safer for our walking parishioners to negotiate the A342 and C77 crossroads, and for motorists entering and leaving the junction from both sides.
- 27. The A342 carries a massive amount of traffic from the M4 via the Chippenham and Marlborough junctions on to Andover and eastwards, and obviously the other way around. Penton Grafton Parish Council has recorded an HCC traffic survey carried out in 2024 showing

'an average of over 1,000 vehicles per hour travelling through Weyhill at peak times, and a daily average of over 14,000 vehicles.'

Does this not show enough significant usage to warrant a proper assessment of the portion between Weyhill and Ludgershall?

An A342 Working Group has been set up and will be reporting to you separately.

## **Public Transport**

- **28.** Parishioners face a 1 mile walk up a hill with no footpath to the A342 to pick up the Activ8 bus. Walking along the village road can be hazardous at the best of times with the mix of vehicles, including HGVs coming and going to the local farms and Pilgrim's Europe at Tilly Down, and speeding and bad driving is already an issue.
- 29. The Community First minibus service has operated since April 2025 to replace the local bus and taxi service. It is a bookable service so not quite the same as truly 'public' transport. The service is therefore not used as much as it might be. We understand it is central government funded through Hampshire County Council for 2 years from April, with its future unknown.
- 30. **Summary:** public transport for the villages is not very good, faces an uncertain future and its existence should not be relied upon.

## **ECOLOGY**

TVBC evidence is based on the <u>Habitats Regulations Assessment</u> – January 2024 report by AECOM Infrastructure & Environment UK Limited. **This report specifically does not cover sites NA16** and **NA19** so there is no evidence on this subject to support their inclusion.

31. Appleshaw is a rural village and this subject is as important to us as any of the above. We are surprised that TVBC has not sourced an up-to-date planning assessment given its importance as evidenced, for example, in Ben Kite's excellent Biodiversity Action Plan for Appleshaw Churchyard and Cemetery - <a href="https://www.appleshawchurch.com/wp-content/uploads/2020/05/200403-1\_Appleshaw-Churchyard-BAP-030420\_Ben-Kite.pdf">https://www.appleshawchurch.com/wp-content/uploads/2020/05/200403-1\_Appleshaw-Churchyard-BAP-030420\_Ben-Kite.pdf</a>.

Will TVBC source a Habitats Regulations Assessment which includes NA16 and NA19?

# [Added 1 Sep 2025] VIABILITY AND AN ALTERNATIVE SUGGESTION

TVBC evidence is based on the <u>Viability Study</u> – January 2024 report by BNP Paribas Real Estate. This report specifically does not cover sites NA16 and NA19 so there is no evidence on this subject to support their inclusion.

32. We suggest the total of 1,069 dwellings is transferred to an area which has been properly assessed and which already has the infrastructure to support a large new town, for example the land at Velmore Farm and Castle Lane which is 75% developed. That would save our rural villages from merging into another Valley Park without a cold professional look at the consequences.

## **Appleshaw Parish Council**

Jenny Hopkins, Chairman Barry Hodgson, Vice-Chairman Tony Burden, Councillor Denise Hodgson, Councillor Carole Wootton, Councillor