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Planning Policy Team
Test Valley Borough Council
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Weyhill Road
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SP10 3AJ

5TH September 2018

Dear Sir

Our Future – How do we plan for it? The Next LOCAL PLAN

Please find attached my personal views on the issues raised in your consultation document with the above heading.

Yours faithfully

A.R. Whiting

Test Valley

OUR FUTURE - HOW DO WE PLAN FOR IT?

Issues and options consultation for the next local plan covering period up to 2036.

Comments

Introduction.

This response is the writer's view on issues regarded as important, set out as responses to the various questions TVBC have set out on their consultation document.

This document highlights the importance of "sustainability". We are able to see what is meant by this term on the Planning Aid website, which lists 13 land use and development objectives which are readily understandable but not, in my view, necessarily helped by parts of the current planning system. The 13 objectives can surely be summarised by the objective to maximise the total net internal and external benefit from the use of land resources. This is the approach the writer has taken in commenting on the questions raised.

The point ought to be made that most if not all the issues raised in the individual questions are linked in some way to other issues similarly raised .

Comments on specific questions posed

1. Q1 There are several factors which make living/working in Test Valley attractive. These include a pleasant attractive environment, a high level of prosperity, easy access to London and other local cities, good access to local airports, and a historic element which gives the area character. Dangers to this attraction include poor highway maintenance, a point referred to again in Item 8 below.
2. Q2. Life particularly in rural villages could be improved by giving to village communities a greater role in deciding what is built in or done to their villages, together with an improvement of the standard of architecture in any new development in these areas. Reasonable and efficient parish boundaries and gaps between settlements are important to this issue.
3. Q3 The area's aspiration should be to absorb the expected uplift in population with no detriment to the character of the area and as much local net benefit as possible from the increased population. Evidence in other parts of the country suggests this might be better achieved by smaller schemes of sympathetically designed houses.
4. Q4 and Q5 If every borough resists further inflow of residents the effect on the welfare of the country would not be good. There are currently over 800,000 UK job vacancies which suggests a need to both expand and educate the workforce. This tends to justify the application of the Government's methodology on this topic.

5. Paragraphs 5.12 and 5.13 are well crafted points which go to the heart of the exercise. For rural settlements to flourish there is a need to avoid them just becoming centres of ageing population. It may be that encouraging younger people into villages selected for development is helped more by the availability of high quality housing in the middle and upper price bands, thereby attracting younger people who, for example, might be residents of London or nearby cities.
6. Paragraph 5.17 and 5.20 also contain critical points. The mention of the word "sustainable" in the former should be challenged. Housing in villages complies with six of the 13 items comprising sustainable development, rather more I suspect than small unit houses in town centres.
7. Q7 In rural settlements selected for development in the Local Plan, any development should be more community led within strict numerical limits (rather than Local Plan led development) in order to exploit all suitable development opportunities whatever their size. Consideration should be given to making TVBC funds available to Parish councils to help bring the best architectural talent to their villages.
8. Q7 New housing distribution is surely affected by the current appalling state of some of Test Valley's roads. This must be a factor in the choices developers make about where to invest, unless the point is covered by specific highway improvement agreements relating to individual sites. Access means value. In the light of what are said to be massive unfenced Council financial reserves, I believe the local plan must include a commitment by TVBC and HCC to repair all Borough highways to a safe and acceptable standard in accordance with the requirements of the Highways Act 1980. This will help maintain the attractiveness of Test Valley as a place in which to live and work.
9. Q9, para 5.38, Q12 and Q14. The present approach to settlement boundaries should be maintained but with the exceptions and flexibilities mentioned elsewhere in these answers. Settlement boundaries ought not to stand in the way of good quality very small scale non infill development if it has the support of local residents and the relevant local Parish Council in locations selected for development in the Local Plan. Measures to deter unwise development could include a strict limit on the number of new dwellings in rural settlements during the local plan life, and limiting new rural dwellings to a maximum distance from existing building whilst deterring infill development. I feel that infill development can distort the appearance of rural settlements as gaps between dwellings often helps to maintain the character of these areas. The current Local plan point in para 5.28 contains an alternative suggestion which might deal with this issue if infill can be deterred.
10. Q10 Affordable housing. Given that this takes a substantial percentage of housing from the total available, thereby making the rest a smaller number and presumably increasing values as a consequence, an economic analysis is surely needed to see if affordable housing is justified. Recent reports suggest that direct Government help is providing the greatest help to first time buyers. Para.5.35 refers to national planning policy and affordable housing on

the edge of rural areas. This is likely to attract a hostile local reaction and, as mentioned above, I feel that before the 40% principle is adopted, an analysis of the affordable housing issue is needed, taking in the recent evidence mentioned.

11. Q15 I do not support the special needs point in this question. I do support the notion of mixed communities which adds to the quality of life in Test Valley.
12. Q16 The market can determine the size of new dwellings up to a point but there must, I feel be greater control over the degree to which new build compliments existing buildings, particularly where historic buildings and buildings of interest in villages are involved. We should not be afraid of pastiche design if it is well executed. Some areas of East Anglia have recently managed to achieve this and so it is not an unachievable objective.
13. Q17 The suggested rigidity implied in this question seems to deny the point that villages and settlements in Test Valley vary greatly in their character and requirements .The idea that the same rigid policy should be applied on this topic to all of them seems ridiculous. Listed buildings in these areas have to continue to offer practical attractive accommodation to those with the resources to maintain and repair them. A dual objective of preservation and practical adaption for modern living should prevail over, for example, attempts to undo consented works to reflect those in the planning department at any one time. Maintaining old and listed buildings adds greatly to the attractiveness of Test Valley and it should be a policy objective to make owning and living in these buildings as attractive as possible.
14. Q18 see comment above re Q3. I am frequently alarmed at the high densities of some of our new residential development schemes and feel that TVBC should identify the ideal density level in each site, thereby maximising external benefit from schemes and the long term benefit of their dwellings.
15. Q19 Having recently seen a local new dwelling with inadequate headroom in on one floor I believe the Council should establish internal space standards to maximise appeal of new housing.
16. Q21. It seems to me that rural worker housing has rarely if ever resulted in rural building which enhances the appearance of rural settlements. Housing provided for workers in a particular industry seems to me an outdated concept.
17. Q26, Q27 and Q28. Knowing someone who has recently started a business Andover in an industrial unit, I feel that this issue has to incorporate the level of business rates which seem to me to be punitive. There is no point in providing more land for workspace units if the units attract a level of business rates which deter start-ups and make business success too difficult. Re Q28, I certainly do not believe it is practicable or reasonable to try and control business use in new residential property unless the use is inconsistent with residential use, thereby requiring a change of use planning consent. The suggested controls would be oppressive, impossible to police and would probably reduce the attractiveness and value of the relevant housing. Developers may look elsewhere to build.

18. Q22 Gypsy /traveller campsites is a controversial issue – it is a use which can adversely affect existing communities and I do think it is acceptable to propose them without the agreement of the communities they are likely to affect.
19. Q29 In my view car park charges in Andover are making the town centre uncompetitive by comparison with out of town centres where parking is free and by comparison with nearby city shopping centres . I support the encouragement of retail uses in primary frontages as the critical mass factor makes the centre attractive for shoppers. Retail use, however, has to be seen as part of leisure activity and planning flexibility coupled with good judgement is needed to keep shopping areas vibrant . This issue links in with encouraging those with high spending power into the area with the right type of rural housing policy.
20. Q33 I favour the retention of local gaps which serve to preserve the identity of settlements and villages to maximise general benefit.
21. Q36.and Q37 Gaps between settlements and farmland generally should not be compromised and certainly not by the introduction of solar panels on farmland, surely one of the most unsightly of land uses and located often in areas where there is an embargo against all other forms of development. How is local net benefit maximised by these panels? Where is the public endorsement for such a land use? The grant of planning consent for such schemes without a requirement to provide a performance bond in each case to cover eventual dismantling and removal is in my view highly irresponsible, bearing in mind, inter alia, the dangerous fluid and other substances that some panels contain. Once the panels are life expired, such sites could become incapable of reasonably beneficial use and TVBC might find itself having to bear dismantling costs. Such sites should eventually be returned to agriculture and I am worried that, in effect, the solar panels are a stepping stone to permanent commercial development to fund this dismantling work, compromising gaps between settlements and the rural attractiveness of parts of the borough.
22. Para 7.6 This paragraph deals with measures connected with air quality. There is no detail given regarding the 2015 data on which the concern is based. Who concluded that domestic wood burning stoves have a link to health issues? To me the whole idea that burning wood on a domestic fire and alleged attempts at burning of wet wood can be harmful to health is quite ridiculous. There have been wood burning fires in use in England since before Tudor times. I believe that the Council should resist the incorporation of this requirement into policy until further stringent research is carried out on the air quality issue to see if the concern is valid or merely a political notion.
23. Q35 Whist I support water efficiency, this should not be at the expense of public health issues and care should be taken always to have this as a priority.
24. Para 7.20 and Q39 It is my experience that TVBC planning officer reaction to village design statements is not encouraging, in that the will of those consulted does not seem to be respected. A declaration of policy to the contrary would be a help in this area.

25. Q39 There is a need for more architectural excellence in Test Valley. The traditional approach to this issue, ie. let the market decide, has not been universally successful in the borough, particularly in smaller schemes. Perhaps a local architectural forum with contributions from outside the borough and including newly qualified architects would raise this issue to greater importance.
26. Q44 and 45; Parking in new development. I do not support the council preaching to residents about how they get about, from the viewpoint of health improving activity . I do not think we elect councils to do this. There are enough gyms in Andover for those who want to keep fit, an industry not helped by the high levels of business rates levied on the premises they occupy. If TVBC want to help the keep fit factor of Test Valley, a special rate reduction here would help keep these gyms going. I am also critical of inadequate parking in new residential development. Each house should have two parking spaces to offer practical living conditions, probably with two people working in different locations. On road parking for visitors is also an essential consideration.

A.R.Whiting

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