

Thursday, 03 March 2022

Mike Dean

Ref: Regulation 18 Stage 1 of Draft Local Plan 2040

Dear Test Valley Borough Council (TVBC),

You asked for comments on Regulation 18 Stage 1 of the Draft Local Plan 2040. In general I agree with the thrust of the document although some parts look like 'consultant-speak' and are very vague.

My comments on specific aspects are given below in the order they appear in the original document.

Chapter 2 (Vision, Key Challenges and Objectives)

Para 2.32 - More needs to be said on the role of Neighbourhood Plans, etc and on the role they will have in the overall planning process. If such plans are regularly overruled in favour of more general development plans or initiatives then the value of the plans will be diminished.

Para 2.34 - Online shopping and home deliveries are increasing the amount of traffic in residential areas and organisations are now generally using larger vans in order to make multiple deliveries in an area. This is increasing the demand for residential road space and manoeuvring areas in cul-de-sacs.

Para 2.35 - Encouraging 'Click & Collect' services in town centres might reduce the number of delivery vehicles and would also encourage people to come into town.

Para 2.41 - Rising groundwater is not the only cause of local flooding - the other is inadequate drainage or blocked existing drains. This needs to be dealt with now and not left until 2040.

Para 2.53 - Design codes are all very well, but fashions change and TVBC will need to be wary of imposing a design structure which is inflexible and which might look very dated in future years. TVBC needs to have the freedom to take the best of what might emerge in future years.

Para 2.58 - Home working might alter residential demands through a need for larger properties which can provide a separate 'office' space, or a larger garden which can accommodate a shed for an office.

Para 2.64 - (Transport and Movement section) - Electric cars are increasingly being promoted as environmentally better, plus they are a stepping-stone to self-drive and autonomous vehicles. Electric charging infrastructure is therefore likely to feature more strongly than mentioned in this section. For example TVBC will need to consider whether it should be operating electric council vehicles and what changes this might require at depots. Houses with no drive or garage will need charging infrastructure on the street. This is a more pressing issue than the Plan acknowledges.

The Government is intending that the balance between petrol/diesel and electric vehicles should be changing considerably by 2040. Petrol stations currently do not need to provide much parking space for cars filling up with petrol or diesel, but an electric car will need much more space - what will be the future for petrol stations ?

If petrol stations become unviable in an 'all-electric' future then the land would become available for development.

Chapter 3 (Spatial Strategy)

Para 3.36 - The Settlement Hierarchy seems valid - access to public transport may be a key factor if reduced car use is the long term aim. This is relevant also in terms of access to services - if the only practical access is by car then this may not reduce car journeys.

Chapter 4 (Strategic Policy Framework)

Para 4.17 - Thought also needs to be given to the cost-effectiveness of measures. The best solution for the environment might make new developments unaffordable and Developers might resist.

Paras 4.20 & 4.21 - Safe walking & cycling measures might require infrastructure improvements to provide a consistent standard across existing and new developments.

Paras 4.26 & 4.28 - TVBC will need to consider how to deal with conflicts between development space for green infrastructure and development space for housing, particularly given the linkage that is built into this strategy.

Strategic Policy1: The cost or supply of Affordable Housing is likely to be affected by the proposed environmental standards strategy. If Developers have to pay then they are likely to want to recoup some of the cost in higher prices, as implied in Para 4.34.

General comment - Where environmental mitigations are offered as part of new developments, Developers are likely to propose mitigations that are based on activities outside the Test Valley area, such as planting a new forest elsewhere in England. Mitigations should be effective at the same time as the new development and TVBC should verify that the mitigations are delivering the stated effect over the quoted timescale. TVBC should also check that the same mitigation is not being used for developments elsewhere.

Para 4.39 - Biodiversity Net Gain (BNG) should be delivered locally otherwise Developers might offer BNG as part of a development elsewhere in England. TVBC will need to verify that one BNG is not being used to satisfy multiple local authorities at the same time.

Para 4.57 - TVBC will need to be careful that proposals favoured by the community are in fact the best ones for the circumstances. There could also be situations where community proposals are valid but overlap or clash with a neighbouring community's proposals, such that the combined effect is not appropriate. TVBC will need to act as arbitrator in these situations.

Para 4.58 - Public art should reflect the values, heritage and aspirations of Test Valley and consideration should be given to 'short-term' art installations, not just permanent features. This would allow a range of works to be presented and would generate more interest. Where artwork is proposed as part of a new development then the artwork should reflect the area or the history of the area, rather than being purely abstract.

Para 4.61 - The idea that "our town centres have evolved primarily as meeting places for people" is self-evidently not true as the commonest complaint pre-pandemic was the lack of large shops in Andover which was resulting in people doing their shopping in Basingstoke, Salisbury, Winchester or wherever. The trend for home shopping was accelerated by the COVID lockdowns, but the idea that residents won't want to go shopping in town in future is misguided. People may not want, or be able to afford, high-speed broadband and if Andover town is re-aligned purely towards entertainment then there is a danger that people will go where they can get shopping and entertainment in one place.

Para 4.72 - I am concerned that the Andover masterplan as outlined here seems to be a collection of generalities whereas the Romsey one in Para 4.74 seems to have more specific targets. The Andover masterplan needs to have a greater focus on what is going to change, particularly in terms of the redevelopment of the Chantry Centre.

Para 4.86 - The historic parts of Andover must be integrated effectively into any new developments such that the whole town remains as one community. Historic Andover must not be treated as an outdoor museum exhibit which can never adapt to changing circumstances. For example Andover Museum might thrive better if it was re-located to be part of the Chantry Centre redevelopment scheme.

Strategic Policy 4(e) - "Well-connected, functional and high-quality public realm" developments are not a substitute for effective policing. The causes of anti-social behaviour are not simply down to the state of the buildings - the human causes also need to be tackled.

4.110 - Where the Council receives Developer contributions in lieu of infrastructure then the Council should deliver the infrastructure in the same timescales as the rest of the development, and not use the funds for an unrelated project, or in a different timescale.

Para 4.133 - Electric vehicle charging points will be needed in car parks and, probably, on-street. Many car drivers are likely to switch initially to hybrid or full electric cars rather than walking/cycling/etc. This needs to be planned for as a series of steps, rather than simply focussing on an assumed single switchover from Car to Alternatives.

regards,

Mike Dean