

TVBC LOCAL PLAN 2029-2040: NORTH TEST VALLEY

REGULATION 18 STAGE 2 COMMENTS BY CLAIRE BAILEY, LITTLE SHODDESSEN

(I) INTRODUCTION: SUMMARY OF OBSERVATIONS AND MATTERS FOR FURTHER CONSIDERATION

I have approached the Draft Local Plan on a positive basis, by considering what needs to be done to ensure that the proposals which affect us (both in the Parish of Kimpton, and particularly in Little Shoddesden) can be implemented in order to enhance both our local community and the wider North Test Valley community.

My comments encompass suggestions for further investigation, studies and detailed consultations, as well as matters which I think have not yet been sufficiently taken into consideration.

These comments and observations are made in no particular or significant order.

A GENERAL COMMENTS and MATTERS FOR CONSIDERATION

- The evidence base for the Plan is 2020; why? That was perhaps the least 'normal' year since 1945. Are TVBC confident that the formulation of the Plan based on 2020 presents an accurate picture of the needs of the Borough for 2029-2040?
- The TVBC proposals for residential developments to the East and South-East of Ludgershall must be considered together with the proposals by Wiltshire for development of the site South East of Empress Way
- Wiltshire refer to 'Tidworth and Ludgershall Market Town'; is this a vision shared by TVBC?
- With the addition of 2,720 new homes, the population influx is likely to be 8-11,000; without information as to the mix of houses this cannot yet be quantified
- While the Plan envisages consultation with neighbouring authorities (Wiltshire Council, Ludgershall and Tidworth Town Councils) and 'partners' (e.g. healthcare providers, the Ministry of Defence) there are no clear proposals as to how TVBC will ensure that all essential services and amenities are available to the new residents as soon as they move in
- The Plan acknowledges that there is a greater need for housing in South Test Valley (where there are jobs) than in North Test Valley; why then is there a 57%-43% split with more houses to be built in the South?
- The Authority Monitoring Report (AMR) for 2022-23 indicates a slowing down in housebuilding in TVBC; does this indicate a lessening in demand?
- Neither the TVBC nor the Wiltshire Plan includes either enough space or provision for Section 106 agreements to provide the additional amenities which 8-11,000 people will need, including schools, hospital and A & E facilities, community and leisure facilities
- The development of the new town(s) will significantly change the character of Ludgershall and potentially of Kimpton
- There are no clear proposals in relation to the road bridge access to the site to the South of the railway line, or the new main road passing through the Wiltshire/TVBC town(s) and the A342 junctions

B HEALTH & SOCIAL CARE

- The new residents will need GP services; I understand this is under discussion and that the Castle Practice anticipates being able to serve the increased demand
- There is a general shortage of dentists; what are the proposals?
- We currently have very limited access to nearby A & E (Andover Hospital requires a phone call ahead of arrival) and the distance to A & E is over the NHS recommended travelling time; what is proposed in this regard?
- The Air Ambulance will have moved to Eastleigh (to serve the greater demand in South Test Valley and Hampshire) which will increase the risks to us and the new residents.
- Local care and nursing homes already have waiting lists; will more be built? How will they be staffed and funded?

C CRIME & POLICING

- Tidworth has a new police station but they are still recruiting. They will cover the new town in Wiltshire
- We are served by Hampshire Rural Police; currently a Sergeant and a PC (the other is off sick); they cover 245 square miles and cannot effectively police this area. What are the proposals in this regard?
- The violent crime level in Hampshire is 107% of the national level (in Andover it is 200%)
- Unless there are adequate community facilities for the new town(s) crime will increase; the provision of playgrounds, sports and leisure facilities and/or community centres is vital, but the TVBC Plan does not include these; Wiltshire relies on Ludgershall Town Council and the Ministry of Defence; this could present serious risks to the local community

D EDUCATION & TRAINING

- All the local pre-schools are operating at, or close to capacity; there is insufficient provision in the Plan, even with the Wiltshire proposals
- The same applies to primary schools
- Two local secondary schools (Wellington Academy and Winton) have built extensions just to cover existing demand; there are no proposals by TVBC or Wiltshire to build new secondary schools
- Transport to Colleges (in Andover, Sparsholt or Swindon) is problematic; what is proposed for the new residents?

E COMMUNITY FACILITIES & AMENITIES

- Paragraph 4.87 acknowledges this needs further discussion; what is proposed?
- The existing facilities in Ludgershall and Tidworth are not within walking distance of the new town(s) nor are they sufficient to meet the needs of 8-11,000 new residents
- It is not clear whether either TVBC or Wiltshire intend to provide for playgrounds and open spaces
- There are sports facilities in Tidworth, but these are too far away for the new residents to walk there
- Wiltshire suggest that Ludgershall and the MoD be responsible for sports and leisure facilities; without an enforceable agreement how likely are they to do anything? Where will the funding come from?

- Access to shops is likely to be difficult: there is not enough parking in Ludgershall and the shops are small; in Tidworth at times of increased demand parking and access is already difficult.
- Unless provision is made, with a Section 106 agreement, there will be no scope to add these facilities

F COUNTRYSIDE & ENVIRONMENT

- The Plan recognises the need for sensitivity, consultation and further proposals in relation to the North Wessex Downs and Salisbury Plain Areas of Outstanding Natural Beauty
- This will need to be addressed in the construction phase
- It is acknowledged that important habitats will be affected by the construction and then the additional population, with footpaths having a significant impact
- Careful balancing of nature and access to the countryside is needed
- Some may question the wisdom of covering good arable land with houses, industrial sheds and solar panels; we need food security as well as the ability to enjoy our exceptional natural environment. What mitigation measures will be implemented and enforced?

G FLOODING & BIOSECURITY

- Both the TVBC sites have some standing water
- Most of the local villages suffer from flooding and sewage contamination; there are ongoing works in Kimpton
- We have three pumps keeping our basement dry
- Great Shoddesden and Little Shoddesden rely on private water supplies which are particularly vulnerable
- We would be seriously affected if the additional run-off, drainage and sewage were not properly managed
- Where will the sewage from the new town(s) go? Fullerton is working at full capacity

H ROADS & PUBLIC TRANSPORT

- The Plan envisages linking the new town(s) to one another and to the surrounding road, cycling and pedestrian routes
- Public transport is poor; the bus service is neither frequent nor reliable
- People will need their cars; the additional cars (likely to be 15-20,000) will swamp the existing road network unless there is improvement and management, which needs to be in place before people move into their new homes; what are the proposals?
- The access roads to the site South of the railway line are inadequate for construction traffic
- The proposed new railway bridge will be a difficult, costly, and lengthy civil engineering project but it should of necessity be in place before construction begins
- There are significant challenges to be addressed in relation to the new arterial road from Tidworth/Ludgershall to the A342 through the new town(s) to the South of the railway line
- Access for pedestrians and cyclists from Ludgershall under the Shoddesden Lane bridge should be revisited in the light of the essential vehicular access for the residents
- Unless there are enough jobs, schools, shops, hospitals etc. in North Test Valley, the new residents will be commuting by car to South Test Valley, or maybe to Wiltshire; the existing

road network must be reviewed and a full assessment and plan prepared and put in place in readiness for the extra traffic.

I ARCHAEOLOGY

- There have been significant archaeological finds in the area, from Bronze Age through Roman to Mediaeval
- Some finds of significance are (we hope!) in the British Museum; others in Andover Museum
- Both TVBC and Wiltshire must put in place measures to ensure that there is access for archaeologists to all the proposed development sites prior to commencement of construction

J EMPLOYMENT

- To assess the future workforce, is it not important to set out the housing mix and based on that the number of people of working age who will live in the new town(s)?
- Part of the attraction of moving somewhere is to move close to a job; there should be jobs available before completion of the developments
- If there is to be an influx of a significant number of people actively looking for work, will there be enough jobs in North Test Valley?
- We know that there is an exceptionally high number of economically inactive people of working age in the UK; what do TVBC propose to do to encourage people to work? The burden of an influx of non-working people could be significant.

K INFRASTRUCTURE & SERVICES

- There has been publicity about the National Grid being at full capacity; have TVBC/ Wiltshire engaged with them as to the requirements for the new developments?
- There are no proposals for renewables; this would be an opportunity to include air source heat pumps, solar panels and possibly small turbines.
- There are serious issues with Southern Water; what discussions have taken place/ are proposed?
- Will there be a gas supply? Will bottled gas be permitted?
- Telecoms and broadband services from BT/Openreach are very poor in the area; Ludgershall residents come to family or friends in Kimpton; in Little Shoddesden we rely on 3G or satellite services; will there be FTTP for the new town(s) and will this be extended elsewhere?
- What are the plans for waste collection? Will there be harmonisation with Wiltshire?
- Will there be domestic waste and recycling facilities? Otherwise the fly-tipping, already a problem, will increase.

L HEALTH & SAFETY

- Traffic management during construction, in particular potential road closures and diversions during constructions of the bridge and all new road junctions, must be carefully planned to mitigate the risk to Kimpton, Great Shoddesden and Little Shoddesden
- The new arterial road through the TVBC and Wiltshire developments will need new access roads at either end with careful management to ensure safety for residents and users

- Access for pedestrians and cyclists at the Ludgershall end of Shoddesden Lane presents some challenge and might be reconsidered; there should be consultation with the operators of the affected Farms and residents
- There should be effective barriers to prevent access to the railway line; the fact that its use is unpredictable makes it more dangerous
- There will be the potential for noise, air, light and water pollution both during the construction phase and after completion; all these matters will need to be addressed to ensure effective management
- Both TVBC and Wiltshire Environmental Health Officers must be resourced sufficiently to enable them effectively to manage the issues arising, which will bring a significant extra workload from the start of construction (maybe even now)

(II) DETAILED COMMENTS

A GENERAL COMMENTS and MATTERS FOR FURTHER CONSIDERATION

General observations

If a holistic approach can be taken to the implementation of the proposals, they have the potential to regenerate the area, bringing sustainable new homes and employment in a beautiful part of Hampshire. However, if these extensive developments are not properly managed and supported they will have the ability to blight the whole area.

My concern is that unless Test Valley Borough Council (TVBC) work together with neighbouring authorities, Parish and Town Councils and community partners, we could find that building the new homes causes more problems than it solves. In particular, all of the associated infrastructure and facilities (e.g. health care, policing, education, employment) should be prioritised so as to be in place to serve the needs of the new residents as they move in.

Because space is limited, I propose to deal with each specific area of concern separately. Here, I will set out a few general points and comments which I think merit further consideration.

Evidence Base

I would question the starting date of **2020 for the evidence** base, referred to in paragraph 1.43 (see also 2.15).

We had news of Covid19 in late 2019 and life in the UK changed dramatically in 2020; nothing resembling pre-Covid19 normality has yet been achieved.

The unsuitability of this date must be acknowledged, namely that because of the Covid19 pandemic, 2020 was not a 'normal' year, nor a year to be taken as the basis for any evidence in relation to how people live their lives. This is recognised in paragraph 2.15, which acknowledges that the Covid19

pandemic has changed the way in which many people live and work. Why then is 2020 used as the evidence base?

If a more 'normal' year were selected, say 2022, what changes would be made to the proposals in the Plan?

Review of 2011-29 Local Plan

Paragraphs 1.12 and 1.13 refer to a **review of the 2011-29 Local Plan**. Can TVBC tell us whether infrastructure projects have kept pace with housebuilding? Has the provision of essential services (e.g. GPs, dentists, schools policing) been sufficient, particularly in the light of the larger developments around Andover, as well as Ludgershall and Tidworth?

The Authority Monitoring Report (AMR) for 2022-23 shows that the rate of housebuilding has slowed from 169% of Revised Local Plan (RLP) requirement in 2015-16 to just 65% of RLP requirement in 2022-23. This might be related to an over-estimated need for housing in North Test Valley, given that the jobs are in South Test Valley and the infrastructure is not in place to support the RLP.

There may be lessons to be learned from what has happened since 2011. Ignoring 2020-21 (Covid19 will have skewed everything), have house sales and rentals been stalled by lack of jobs and other local amenities?

Whatever the reason, it is worth examining whether the proposals in the 2029-40 Plan represent an over-estimate of local needs. If there is a real need for more new homes in North Test Valley, I would hope that TVBC would ensure that provision is made for ALL associated needs, and that such provision is in place (or committed and enforceable under Section 106) BEFORE AND AS A CONDITION OF planning consent.

It is of course possible that Government requirements have a part to play, but developers will not build houses they cannot sell, nor will people buy them if they are not well placed for access to work, health care, education and other amenities. House sales in Ludgershall, for example, are slow; properties frequently stay on the market for a long time and price reductions are usual; often a property is taken off the market for a few weeks and re-marketed for up to 10% less.

In the event that the new homes are built and the people who move into them are economically and socially dependent, what contingency plans do TVBC have in place to support them?

Consideration of all relevant proposals: Population

The TVBC Draft Local Plan proposes:-

- Land East of Ludgershall: 350 homes: this is a site to the north of the A342
- Land South East of Ludgershall: 1150 homes: south of the A342 and the railway

See pages 79-83 of the Local Plan.

These proposed developments to the South-East and East of Ludgershall ought properly to be considered in conjunction with the developments proposed by Wiltshire to what they describe in their Local Plan as 'Tidworth and Ludgershall Market Town', in particular for the 'Land South East of Empress Way' which will be contiguous with the proposals for the South East of Ludgershall. These proposals include:-

- 270 houses to the South of Empress Way (already allocated)
- 2,080 homes to the South West of Empress Way

See pages 99-103 of the Wiltshire Local Plan 2023. Figure 4.27 on page 102 shows the location, which would be contiguous with the development proposed by TVBC to the South East of Ludgershall.

Interestingly, the Wiltshire proposals refer to 'Tidworth & Ludgershall Market Town'; it is not clear from the plan but this indicates an intention that these two small towns should eventually be merged. Para 4.195 of the Wiltshire Plan refers to the main area of expansion being to the south-east of Ludgershall.

The TVBC and Wiltshire proposals together envisage a total of 2,720 new homes; the potential additional population could be 8-11,000 people. This is in itself the population of a small town. Added to the existing population of Tidworth, nearing 11,000 and Ludgershall, around 5,500, the new 'combined' market town's population would be over 22,500, almost half the size of Andover, currently about 49,000,

The current population figures may well be a serious underestimate, as the latest census figures are from 2021.

The TVBC proposal envisages 40% affordable housing. Such homes are most likely to be lived in by young people with pre-school or primary school aged children. Have the projections for school and pre-school places taken this into account?

Far from maintaining the character of individual settlements (TVBC page 17), Such an influx of people risks overwhelming the existing towns.

Both TVBC and Wiltshire recognise the need for consultation; hopefully this will result in a 'joined-up' and holistic approach to the overall development of Tidworth and Ludgershall, within the context of their rural surroundings and with due consideration for the needs of the much expanded population.

Housing need & Employment

The TVBC Plan accepts that there is more work, and the need for housing is in the South Test Valley (para 3.61) but there is a 57%-43% North-South split for development; why? Many essential amenities and aspects of infrastructure are already stretched beyond their capacity, e.g. sewage treatment and schools.

In the light of the greater need for housing in South Test Valley: What sites have TVBC considered in the South? If none have been considered, why not? What sites have been considered in the South of TVBC and discounted, and why? Why have they not been given priority?

The AMR 2022-23 refers to 'Employment Land' but there is no helpful information about, for example, the number of economically active people (truly active, i.e. consistently in work; not 'job-seekers') in TVBC as against the number of job vacancies; or the number of new economically active residents as against the number of new jobs created. TVBC need to take steps to

Economically active people will not come to live in an area where there are neither suitable jobs nor amenities. While TVBC have a plan for Thruxton airfield & business park, there are apparently a number of sites allocated for employment in the 2012 plan which have not been taken up. Will there be enough jobs locally for the new influx of people?

This mis-match could result in a surfeit of houses, or the developments becoming 'dormitory towns' where the residents are neither fully engaged with, nor making any meaningful economic contribution

to, the local community. Without sufficient amenities there is also likely to be an increase in crime, in relation to which the police are already over-stretched.

Section 106 agreements and provision for the community

TVBC have not allocated any space for community facilities; nor have Wiltshire. TVBC say that the need can be assessed later. If all the new homes are built leaving no land for such facilities the community will have none. Wiltshire will rely on Ludgershall Town Council and the MoD. If they make no provision there will be none. What proposals will be implemented to ensure that such amenities are in fact provided?

The lack of facilities will make the new homes less desirable and is likely to increase the incidence of crime by bored youngsters. Both Ludgershall and Tidworth are lacking in attractive facilities in particular for teenagers and young adults.

If there are insufficient pre-school, primary school and secondary school places, where will the children go for their education?

To ensure the success of the proposed developments, TVBC and Wiltshire must both act forcefully and with determination to ensure that there are Section 106 agreements in place for all the necessary facilities and amenities, and to enforce all the Section 106 obligations.

If the existing towns of Tidworth and Ludgershall are able to provide additional amenities and parking, and that there are jobs for those willing to work, and schools for all the children, the new developments could indeed become part of a vibrant community, whether it is called 'Tidworth & Ludgershall Market Town' or just left as 'Tidworth' and 'Ludgershall'.

Whilst it can be said that 'partners' cannot be forced to do what is necessary, it is totally within the control of both TVBC and Wiltshire Council to ensure that no new homes are built without all the necessary supporting infrastructure and local amenities.

Summary and Conclusion

The sheer volume of new homes, and in the region of 11,000 new residents, could have an adverse impact on the existing towns and settlements unless it is holistically managed. With the benefit of sufficient and improved amenities and infrastructure, the new developments could have a very positive impact.

However, a 'new town' such as would be created by the combined TVBC and Wiltshire proposed developments, is not, according to the TVBC Plan, in line with the designation of Kimpton as a Tier 4 settlement, i.e. open countryside. Nor, arguably, are so many new houses needed in the North Test Valley. There is a greater existing housing need in the South, for people to be able to live closer to extant jobs.

There may therefore be no demand for these proposed new homes.

Leaving that aside, the new communities could, if the implementation of planning requirements is properly managed, result in a much-improved local community with significant local assets and amenities.

I think that to allow the building of the new homes without all the basic facilities and infrastructure would have a significant adverse impact both on the existing communities and on the new residents.

This is recognised In particular, no development should take place without ensuring that the following are properly provided for:-

- Health & social care: GPs, dentists, hospital with A & E, care homes and home care; ancillary staff support
- Education: pre-school, primary, secondary, college and vocational training
- Employment
- Crime & Policing
- Local Community facilities & Amenities
- Flooding mitigation and biosecurity
- Roads & public transport
- Environment & countryside protection
- Infrastructure & Services
- Community, sports and leisure facilities
- Local shopping and parking

B HEALTH & SOCIAL CARE

GP Practices

I understand from the Practice Manager that The Castle Practice in Ludgershall and Tidworth have been consulted about the proposals both by TVBC and Wiltshire. They are planning for the contingency of a substantial increase in the population of both towns. I hope that this planning will come to fruition in time for the influx of people once the new homes are built.

There is a severe national shortage of GPs, healthcare assistants, nurses, physiotherapists and all ancillary health care staff.

The BMA recognise that there is a national shortage of GPs. The aim of the Government in 2020 to recruit an additional 6,000 GPs by 2024 has not been met.

<https://www.bma.org.uk/advice-and-support/nhs-delivery-and-workforce/pressures/pressures-in-general-practice-data-analysis>

The average number of patients on a GPs list is 2,295.

There is a clear need for additional GP services if all the proposed development goes ahead.

I understand that the Castle Practice is taking measures to ensure that they are able to provide sufficient GP and general medical support for the new, much larger community. I hope that TVBC will do all they can to assist.

Clearly such provision must be provided for in the detailed proposals, and be in place before the huge population increase takes place.

Dentists

There is a dental practice linked to the Castle Practice, but this too is already stretched. There is another practice in Ludgershall. No local dentist is taking new NHS patients.

While there is a private dental practice in Tidworth, its books are closed. The same is the case for the few private dentists in and around Andover.

What are the proposals to build and staff a new dental practice, or practices, to meet the existing need? What proposals exist to meet the increased need associated with the proposed developments? What consultations have taken place with the NHS and/or local providers?

Hospitals and A & E

Andover Hospital has a 'dial-in' emergency minor injuries unit. Otherwise, patients must go to Winchester (24.6 miles), Basingstoke (32 miles), Southampton (36.7 miles) or Salisbury (18.7 miles). It is not unusual for the journey to any of these to take at least 40 minutes.

The latest report on this issue is from 2014:-

https://www.health.org.uk/sites/default/files/QualityWatch_FocusOnDistanceFromHomeToEmergencyCare.pdf

At that date, there were 200 A & E sites in England, a reduction of 8% since 2002. The mean distance from a patient's home to A & E was 4.4 miles. 84% of attendances were by patients living within 7.5 miles. Admissions came from a mean distance of 5.4 miles, with 70% of patients living within 6.2 miles. Only 3% of patients were admitted to a hospital more than 18.6 miles from home.

There are proposals to close Winchester A & E, with the construction of a new hospital in Basingstoke. But the former may occur before the latter.

There is, therefore, a clear need for a new (or improved) hospital, with A & E services, much closer to Ludgershall and Tidworth, even without the proposed new developments.

NHS England issued a very optimistic report about 'virtual beds' and caring for people at home, in 2023:-

https://www.health.org.uk/sites/default/files/QualityWatch_FocusOnDistanceFromHomeToEmergencyCare.pdf

However, there is no getting away from the fact that people suffering from traumatic injuries, stroke, heart attack etc. need to go to a 'real' A & E department.

The general issue of A & E waiting times is, in my view, distorted by the fact that so many people are without effective GP services that they go to A & E quite unnecessarily. It would be interesting to see the true statistics for waiting times in cases of real need. In my experience, when there is a real need to be seen urgently, the time taken is much less than 4 hours. To keep someone waiting 4 hours when they come in with a cut finger, say, should not be part of these statistics!

What consultation has there been with NHS England? What proposals exist to build and staff the essential new hospital services, both to meet the existing clear need and to meet the needs of the proposed much increased population?

Air Ambulance

By the time these proposals are implemented, the Hampshire Air Ambulance is likely to have moved from Thruxton to Eastleigh. Waiting times will increase and the residents of North Test Valley will then suffer the problems which those in South Hampshire used to experience, and which prompted the move.

Some careful thought is required in order to avoid the potential risk to life which an influx of about 11,000 people could face.

Care for the elderly and others in need

The local care and nursing homes all have waiting lists for patients.

Care homes struggle to fill staff vacancies; they are affected by the national shortage of nurses, health care assistants, carers, physiotherapists, occupational therapists and other ancillary staff.

Those needing care at home have great difficulty arranging it and the home carers are pushed to fit in too many patients to give the care needed.

What proposals do TVBC have in this regard?

Summary and conclusion

Our health and social care services are already struggling to meet the needs of the existing population.

To add a population of, potentially 8,000 – 11,000 without making provision for additional vital services risks knowingly putting lives at risk by stretching these healthcare resources to breaking point.

There should be a realistic and achievable plan for the provision of facilities and staffing, for all the necessary services before the commencement of development.

What is the plan?

C CRIME & POLICING

The current position

This is an area of grave concern.

The Parliamentary consultation paper dated January 2024 shows that we are one of the areas with the fewest number of police officers per 100,000 population. There is a useful map on page 9 of the document at:-

<https://researchbriefings.files.parliament.uk/documents/SN00634/SN00634.pdf>

On page 10, Hampshire is ranked at 40 out of 42 police forces in England, with 167 police officers per 100,000 population.

Hampshire is followed by Wiltshire (158:1000,000) and Lincolnshire (156:100,000).

Suggestions for safe levels of policing are hard to find; numbers will of course vary considerably but a useful study can be found at:-

<https://www.worldatlas.com/articles/countries-with-the-most-police-officers-per-capita.html>

This shows, for example, that in the Pitcairn Islands (UK territory) there are 1,754 police officers per 100,000 people, whereas in Spain there are 533.

Tidworth now has a new police station but more investment is needed to provide adequate cover. Yahoo News report £100million is to be spent over the next 10 years and that South Wiltshire's new policing hub will be in place at the earliest in 2028. There are advertisements on 'Indeed' and the Wiltshire Police website.

While there is some reassurance for East Wiltshire, covering Tidworth (and Ludgershall?) the position in North Test Valley is very different.

We in rural North-West Hampshire are currently reliant on just 3 police officers: Sgt Jeremy Boughey and two PCs. One of the PCs is on long-term sick leave. So the 2 remaining officers are expected to cover an area of 245 square miles! Needless to say, they cannot be expected to do so. It is a criminals' charter! We need to know where the police presence will be to cover the new developments in Hampshire. We are already at risk and these proposals could put our lives at risk.

It is very disturbing to read that the rate of rural crime in Hampshire is 107% as compared to the national rate, and in Andover it is 200%; see:-

<https://www.plumplot.co.uk/Hampshire-violent-crime-statistics.html>

In the rural areas around Andover, we are vulnerable to particular types of crime, including theft of and harm to livestock and targeting by organised crime groups; see:-

<https://www.victimsupport.org.uk/crime-info/types-crime/rural-crime/>

Additional population

With an additional population of some 11,000 people and great uncertainty as to the provision of adequate facilities and amenities, in particular schools, community, sports and leisure facilities, there is a real likelihood that criminal activity could increase significantly with the implementation of the proposals.

There are known dangers from 'county lines' criminal networks, as well as more localised criminal activity. There has been much publicity recently of 'car meets' with large numbers of people meeting at night to race cars on residential streets; there have been several serious injuries.

Without effective policing, it will become known that the new developments are good places for these activities to be pursued without risk of arrest or prosecution.

It would be a great shame if the ambitious new developments became places where law-abiding residents and visitors did not feel safe.

We need to know that these proposals will not be implemented unless both existing and new residents have proper policing cover in place.

What consultation has taken place between TVBC, Wiltshire and the Hampshire and Wiltshire Constabularies? What are the proposals in this regard?

D EDUCATION & TRAINING

Pre-school

Based just on the TVBC developments, with 40% affordable/social housing there are likely to be at least 600 families with potentially one pre-school child each.

There are a few local pre-schools, day care and nursery facilities:

- Ludgershall pre-school: currently there are no vacancies
- Caterpillars operate several day nursery and pre-school facilities in Tidworth; all their facilities are full and they already have a waiting list
- Bright Futures in Kimpton cannot take any more children, because of staff and space limitations
- The Magic Tower in Clanville has a handful of vacancies.

All of these facilities have, I understand, struggled to recruit staff.

There is a clear need for at least one pre-school/ nursery for the new town in TVBC, and at least one for the adjacent new development in Wiltshire.

Will there be clear and enforced Section 106 obligations to cater to this need?

There is some concern as to where the staff might be found, but hopefully the new residents will include some suitably qualified people.

Primary

There are very limited places in the Kimpton & Appleshaw Skylark Federation schools. Although they are a little down on numbers (Appleshaw 25, Kimpton 10), they could not take scores let alone 100 pupils.

This appears to be appreciated with the reference to a s 106 agreement to build a primary school. But even if the s 106 agreement is implemented, and one school is built, it is unlikely to be enough.

Will TVBC re-visit this, in discussion with Wiltshire, and ensure that there is adequate provision built into the proposals, with Section 106 agreements that are both enforceable and enforced by both authorities?

Secondary school

Out of the 1,150 houses in the TVBC part of the new town, the majority are likely to have at least one child in secondary education. Even with 75% this means a need for a minimum of about 860 new secondary school places.

Currently, there is a dearth of secondary school places, even after Wellington Academy have completed a substantial extension project. There are no places available in Ludgershall (no secondary school exists here yet) or Tidworth, or Andover. The Andover Advertiser reported on 22 March 2024 that Winton

Community Academy has started a £5 million project to add essential (already lacking) classroom space and facilities. There will be no extra capacity there.

Where will the children of this age obtain their secondary education? Will TVBC review this with Wiltshire, as for primary schools?

Special Needs and Disabilities (SEND)

Test Valley suffers with the rest of the country from a severe shortage of resources. Locally, as nationally, the provision of support for SEND pupils is stretched beyond its limits and needs more resources in order to provide even an adequate level of support for those in need. There is neither adequate funding for, nor the availability of people appropriately qualified to provide support for children with special educational needs and disabilities.

What proposals exist to provide SEND support both for the current and for the expanded population?

College, further education & training

Young adults coming to live in the new town may want to attend college; they may want to find apprenticeships or training.

None (or very few) of the facilities which may be available are within reasonable walking distance of the proposed new developments. If there were a good bus service this would present no problem.

What proposals exist to ensure that there are sufficient places, and funding available to meet the increased need which the proposed developments would bring?

There may be a limited scope for training and apprenticeships in the workplace, but with potentially many more young people requiring such places, they would need to be in place before the influx of population.

Summary & conclusion

Unless Section 106 obligations are imposed and enforced, and new pre-school, daycare, nursery schools, primary and secondary schools are built (and staffed) to serve the needs of the newly increased population, either people with children and young people needing to be educated will not come to live here, or they will face difficulties finding places.

The fact that children will have to travel further to reach schools if there are insufficient school places which are easily accessible will impact adversely on the road network.

It is hoped that this will be re-visited and addressed in the detailed proposals for the TVBC and Wiltshire developments. At this stage realistic Section 106 agreements can be put in place to ensure that all the children in the new town(s) have local school places. Hopefully TVBC will enforce such obligations.

Young people looking for further education and training should also be able to find it locally and to access places easily, ideally by public transport, otherwise by car on relatively uncongested roads.

E COMMUNITY FACILITIES & AMENITIES

Acknowledged need

Paragraph 4.87 of the Local Plan recognises that there is a need for further discussions about additional community facilities. The laudable aim is to make such facilities available to all without the need to use a car. We cannot envisage being able to access the existing facilities (in Ludgershall or Tidworth, even if these were adequate for the additional population) without driving there.

Community Centres

The combined TVBC and Wiltshire developments will have a population of 8,000 – 11,000; such a town will need a community centre.

There is a community centre in Ludgershall, but that is enough only for the current population of about 5,500. Tidworth has a new Police Station and Community Centre combined; whether people will want to use this facility remains to be seen. Both these facilities are in Wiltshire.

What provision do TVBC envisage in this regard for the Hampshire developments? There appears to be nothing in the proposals. Will this be added as a Section 106 obligation? If not, it will be too late and there will be houses where there ought to have been a community centre.

Without adequate community facilities the new town will be a soulless place. People are happier to have somewhere to meet and it is to be hoped that this will be reviewed, and a Section 106 agreement will incorporate a community centre, and enforce its construction.

Sports & Leisure facilities

There is a leisure centre in Tidworth, and a 'stadium' and cricket ground; there is another cricket ground on the A338. While this is probably sufficient for the current population, an influx of 11,000 people will increase demand beyond the existing capacity.

Wiltshire pass responsibility for this to Ludgershall Town Council and the Ministry of Defence. That is unlikely to produce what is needed, unless it is enshrined in a clear Section 106 agreement. The MoD do not have any incentive to allocate funding without such an agreement.

Will TVBC review the position, together with Wiltshire, so as to ensure that there is an enforceable Section 106 agreement, to the enforcement of which both authorities are fully committed?

Open spaces & playgrounds

It is unclear from the TVBC and Wiltshire plans what proposals exist in this regard.

Will both authorities review, and ensure that there are Section 106 agreements to incorporate children's play areas and open spaces in all the proposed developments?

Shopping

Naturally, the new residents will probably turn first, for their convenience shopping, to Ludgershall. The garage shop is too small for this influx. Neither the Co-op nor small Tesco have anything like enough parking. The town centre parking is already insufficient at busy times.

Unless steps are taken to remedy the position there could be serious problems both for existing and the new residents. For more substantial food shopping we go to Tidworth, Lidl or Tesco; even there we can struggle to find a parking space at busy times as things stand.

New residents may choose to go further afield perhaps to Andover, Salisbury, or Marlborough. All of these towns suffer from congestion and parking difficulties at peak times and at weekends, without any additional traffic.

Whilst there is a 'convenience store' indicated by Wiltshire in the development to the South East of Ludgershall, there is nothing indicated in the TVBC proposals. Wiltshire talk about opportunities for the enhancement of the Ludgershall shopping facilities, but there is no space for this! The roads are relatively narrow and parking is limited.

This needs to be addressed holistically by both authorities in consultation with one another and both the Town Councils.

Will this be revisited as part of the preparation of detailed proposals? An enforceable Section 106 obligation for each new development could address these issues so that the new amenities would be in place ready for the new residents.

F COUNTRYSIDE & ENVIRONMENT

Areas of outstanding natural beauty

The TVBC proposed development site to the North of the A342 abuts the North Wessex Downs National Landscape, recognised as an area of outstanding natural beauty. See:-

<https://www.northwessexdowns.org.uk/>

Both the TVBC and Wiltshire developments to the South East of Ludgershall are within the Salisbury Plain and West Wiltshire Downs area of outstanding natural beauty. See:-

<https://www.google.com/search?client=firefox-b-d&q=Salisbury+Plain+area+of+national+beauty>

The development to the North of the A342 is relatively small but there will be some effect on the adjacent area of outstanding natural beauty and TVBC will therefore need to ensure that there is sympathetic construction and landscaping.

The mix of calcareous grassland and heath, woodland and chalk streams, including some ancient heritage sites of national and international repute, is unique and the long drawn out arguments and litigation over the proposed alterations to the A303 at Stonehenge show how carefully any change needs to be managed in such significant areas.

The fullest and most comprehensive Environmental Impact Assessments and Statements will be particularly important for these developments.

What measures are proposed to reduce or mitigate the impact of the proposals on these exceptional local environmental resources?

Will developers be obliged by section 106 agreements to work together with the Council of Partners (who manage the North Wessex Downs), the Ministry of Defence (Salisbury Plain) and Natural England (both)? What consultations have there been in relation to the preparation and agreement of a strategic approach to the management of the developments both during the construction phase and after completion?

Wildlife habitat

Paragraph 2.44 stresses the 'pressing need to maintain, enhance and nurture our rich and varied biodiversity'; the requirements of the Environment Act 2021 will need to be met, so that any new development 'both minimises any impact on biodiversity and habitat and ensures that measurable biodiversity net gains are delivered' (paragraph 2.45). What are the proposals in this regard?

The impact on the areas of outstanding natural beauty must be assessed, and mitigation must be monitored and enforced. What are the proposals in that regard?

Moreover, there are adjacent proposals for solar parks, at South Park Farm (Great Shoddesden) and Meadow Farm already under construction. Together, these proposed projects would remove a significant swathe of land from the rural environment which provides habitat and hunting grounds for a significant number of species, many of which are already under threat.

I would mention in particular (but without affecting the general comments above):-

Mammals including: Muntjac deer, roe deer, foxes, badgers, stoats, weasels, brown hare, hedgehogs, field mice, common and pygmy shrew, Hazel dormouse, harvest mouse, field voles, hedgehogs, bats including Pipistrelle, Serotine and Barbastelle.

Birds: Ground nesting: grey partridge, Skylark. **Birds of prey:** sparrowhawk, red kite, black kite, buzzard, hobby; Barn owl, tawny owl, little owl. **Specific to Salisbury Plain:** Eurasian hobby, hen harrier, common quail and stone curlew.

Reptiles: adder; slow worm, frogs, toads, newts.

Insects and invertebrates: butterflies are still relatively abundant; they include: Chalkhill Blue, small blue, common blue, holly blue, large heath, green veined white, painted lady, meadow brown, Red Admiral. Humming-bird hawk moth. Wide variety of insects. Various moth varieties. Several varieties of wild bees including solitary burrowing bees.

What are the proposals for the protection and, where necessary, provision of alternative habitat for these creatures?

Habitat Regulation Assessment by AECOM Infrastructure & Environment UK Limited recognises that Salisbury Plain comprises 41% of Britain's chalk downland. Paragraph 2.20 of the Report acknowledges that any plan affecting such areas must not be considered in isolation.

Page 63 of the Report lists the environmental vulnerabilities.

Access and footpaths (and bridleways)

Both TVBC and Wiltshire embrace the value of access to the countryside and its beneficial effects for a community. Access to nature is now well recognised as being important to both physical and mental health.

All of the proposed developments should have ready access to these significant and unique natural resources.

At paragraph 4.104 the Local Plan acknowledges the fact that the development would have a significant negative impact on the existing rights of way. These are well-used footpaths, providing good access to a beautiful area of open land, with a diverse population of local wildlife. The footpaths which run from Little Shoddiesden across the proposed development site are very important to us. They give safe, road-free access across a substantial area almost directly onto Salisbury Plain.

The TVBC plan refers to 'enhancement' to the rights of way (p83, item (f)); we would welcome an explanation of how exactly this can be achieved alongside the proposals in the Local Plan, taken together with the proposed solar parks and the Wiltshire Plan.

There are still several equestrian centres, riding stables and private livery yards in the area. Horses remain an important part of our community. Over the years, the freedom to ride has been curtailed, in part by abuse of the 'right to roam' which has forced farmers to fence off land over which as recently as 15 years ago informal or permissive, sometimes changing bridleways existed.

Have TVBC and Wiltshire considered the position of horse owners and riders?

The impact of footpaths and bridleways on the area should be considered as part of the overall strategy in relation to the management of the areas of outstanding natural beauty.

Farmland

Currently, the areas designated for development are all 'green field' sites, which whilst they are mostly farmed, or grazed, provide open spaces and habitat for the significant range of species of fauna and flora, many of which are already endangered and which are unique to these areas.

The issue of availability of good farmland (both arable and livestock) and grazing (both for livestock and horses) must be taken into consideration.

We are Higher Level Environmental Stewards, and we know of other farmers, small (like us) and large, in the neighbourhood, who are Environmental Stewards. We recognise the value to the countryside as a whole of such agreements as ours.

Although we are not arable farmers, we are conscious of the difficulties posed to the food supply chain by general global issues, not least climate change, wars and changes in trading conditions. The question of UK food production. In August 2023 the NFU called on the Government to give this equal consideration to and priority with the environment.

Defra advised that had the UK been reliant on domestic food production, we would have run out of food in August 2023.

There is a recognised risk that to cover too great a proportion of the countryside with houses, industrial estates and solar farms might render the UK far too vulnerable to the potential rupture of the food supply chain from external sources caused by environmental and political problems.

Similarly to the position in relation to the environment, there is a pressing need for urgent measures to be planned and implemented now to plan for the future food security of the UK.

The balance between this and the Government pressure to build more new homes is bound to be delicate. However, as an aside, would TVBC consider the possibility of more PV panels (or tiles/ slates) being incorporated in new construction (public, commercial and domestic) thereby leaving more agricultural land available for farming?

Noise, air, water and light pollution

The noise, air water and light pollution will start during the construction phase. The impact of all these on the natural environment will be significant and could cause irremediable damage unless properly managed.

Once the developments are completed, there will be appreciably greater pollution in all respects. Without effective management and mitigation our valuable and irreplaceable natural resources will be damaged, possibly irreversibly.

What are the proposals in this regard?

G FLOODING & BIOSECURITY

Flooding

Paragraphs 4.95 and 4.107 refer to 'a small area of surface water flooding' on each of the proposed sites, to the North and to the South of the A342. Additional run-off and surface water drainage, with houses/buildings and hard standing will exacerbate this.

What measures will be implemented to 'locate development in areas of lowest flood risk'?

The Local Plan accepts that the proposed development sites are at some risk of flooding. There is a likelihood that any development might increase the risk. There is now extensive publicity and widespread knowledge and acceptance of the fact that climate change brings a greater risk of flooding. Any potential buyers of a new house will ask about this.

We would be interested to know what the position would be regarding the availability of mortgage finance for buyers. Insurance, both for buyers and renters, could also be an issue. We take it that a prudent developer will engage in the appropriate discussions with TVBC.

What consideration has been given to this issue? Have TVBC engaged in discussion with developers, landlords (or the NRLA) and/or insurers?

As residents of Little Shoddiesden we must put TVBC on notice that we already have flooding problems which we manage with three pumps. We reserve the right to return to this document in the event that the development results in more serious flooding and/or that we have any difficulties in obtaining insurance to cover flooding because of the development.

Item (d) on page 83 refers to, flooding and to the need for a comprehensive and sequential study to ascertain what measures are needed to reduce the risk. Please advise what form this 'sequential study'

will take, and that it will include Little Shoddiesden as we are in the valley below the proposed development to the South East of Ludgershall. We would also expect to be kept fully informed and to be consulted separately in relation to the study.

Biosecurity

There is currently a flood alert for Andover and the surrounding villages, several of which have suffered from sewage overflow problems.

Southern Water have been engaged in extensive remedial work in Kimpton, Thruxton and many other villages around Andover for many months; it is hoped that this will help. In the meantime, it is accepted that tankers are needed to pump away excess ground water and, in some cases, sewage.

Although there is a sewage treatment plant in Great Shoddiesden that is very small. As reported recently in the Andover Advertiser the treatment plant at Fullerton is already working at full capacity. Where will all the additional sewage go?

Both Great Shoddiesden and Little Shoddiesden have private water supplies and might be particularly vulnerable.

What proposals are there to minimise the risk in particular to residents who rely on private water supplies?

H ROADS & PUBLIC TRANSPORT

Integration

The Plan envisages careful integration of the proposed developments with the road, cycling and pedestrian routes running from Tidworth, through Ludgershall both to Andover and into Wiltshire. The vision of a fully integrated transport system is outlined in terms which show consideration of the need for the residents (existing and future) to travel to school, work and leisure facilities.

It can be seen from the considerations raised in relation to education, employment, health care, shopping and local amenities, that people living in the proposed new homes will still need cars. Unless and until the public transport network is improved, to provide affordable, reliable and sufficiently frequent public transport links from the new town(s) to where they are required, this need is likely to be ongoing for an indefinite period.

The road network must, therefore, be reviewed and improved to provide access by car to all the amenities to which the new (and existing) residents cannot (if they are fit enough) walk or cycle.

Construction traffic

The only existing points of access to the site to the South of the railway line is from Shoddiesden Lane, which is a single track farm lane wholly unsuited to the volume of traffic which the development will generate.

At the Eastern end, access to Shoddiesden Lane is from Tidworth Road (C3) which is itself a narrow, in places winding road also unsuited to the likely volume of construction traffic. In addition, there are low bridges where Tidworth Road meets the A342 and where Shoddiesden Lane meets the A342 in Ludgershall.

Clearly a new point of access will be needed; the development will require a road suitable both for the construction traffic and for the traffic generated by the development once it is completed.

The new bridge proposed at paragraph 4.103 will be a challenging civil engineering project in itself. The project will need to encompass not only the construction of the bridge, but the junction(s) of the roads leading to the proposed developments both to the North and South of the A342. In addition, paragraph 4.98 proposes an integration of the routes through the site to the South of the A342 with those through the adjoining Wiltshire development.

Paragraph 4.103 refers to this as a 'significant piece of infrastructure' (something of an understatement) and it is envisaged that Hampshire County Council, Network Rail and Wiltshire Council will all be involved. The Army still uses the line to transport tanks and heavy equipment. Will the Ministry of Defence also be consulted?

The matter of access for construction traffic raises several issues.

Firstly, can construction be started without the new bridge? Has there been a feasibility study as to this aspect? I would suggest that given the constraints of the existing roads, the erection of the bridge is a condition precedent to the commencement of construction.

This in turn gives rise to the matter of payment for this project. It is likely to be a multi-million pound project, which will take many months (even years) to complete. Have TVBC engaged with potential developers, and indeed with Wiltshire and the Highways authorities, as to how the cost will be covered?

Secondly, where is it proposed that the new main road through the Wiltshire and TVBC towns will join the A342? If there are to be multiple points of access, where will these be?

Public transport

Paragraphs 4.90 & 4.97 refer to the 'frequent bus service...between Andover and Salisbury via Tidworth'. To describe the service as 'frequent' is wishful thinking. This service is neither frequent nor reliable. It suffers problems with drivers; there are frequent cancellations and delays. Young people travelling to and from school and college also report safety issues. It is to be hoped that increased demand will give rise to a better service.

What consultations have taken place with Stagecoach?

The news coverage of the woes of railway travel is something of which TVBC are surely aware. Although there is a rail service from Andover, many people are forced to rely on their cars to get to work.

Proposals have been put forward for the Army railway to be brought into general public use. What consultations have there been with the Army? Is there a realistic plan for this rail service to be revived?

Unless these issues are addressed as part of the holistic approach to the proposals, there will be serious issues for residents in the new town(s) who need to access employment, schools, shops and all other amenities by car.

Highways

The A342 is a good road, but fairly well used. What consideration has been given to the additional traffic generated by wage earners and school children joining the A 342 in the morning and later afternoon? The pinch point at the Ludgershall bridge is already difficult in busy times.

There will be two new junctions on the A342, one for each of the proposed developments. How are these to be managed? If the proposal is eventually to have a roundabout, what will this look like? What will the impact of all the additional traffic be on the A 342? And on Ludgershall, Tidworth and Kimpton? Drivers already use Kimpton as a cut through to the A 303. It is a small village and the impact of so much additional traffic would be extremely serious.

Paragraph 4.103 refers to a new bridge over the railway line. It is difficult to see that there is room for anything other than a very steep bridge, and the bridge will need to be high enough to enable the Army trains carrying tanks and other large vehicles to pass; the railway line is very close to the road. What are the exact proposals for this, and for the management of the new junction with the A342?

Have TVBC been in consultation with the Army/ MoD about this? What are the proposals?

We would hope that the bridge and road junctions would be properly managed to ensure minimum disruption to traffic but the town of Ludgershall could be overwhelmed by traffic at the busier times of day and this would be likely to impact on Tidworth, Kimpton, Thruxton, Fyfield and all the surrounding villages and road network.

Our roads are already dangerously peppered with potholes; it is not unusual to see abandoned cars with broken axles by the roadside, awaiting recovery. The additional traffic can only worsen this problem.

What consultation have TVBC undertaken with Hampshire Highways in relation to (i) the bridge (ii) the two new junctions with the A342 and (iii) the general increased volume of traffic once the developments are completed and populated?

These significant traffic management challenges need to be addressed, and clear plans put in place, before commencement of the developments.

Additional vehicles and electric charging

Unless more schools are built, more children will need to travel further to go to school. Unless there are enough employment vacancies, there will be more people commuting to work, particularly in the South Test Valley where employment is available.

Without additional amenities as part of the new town(s) people will need to travel further than they can reasonably be expected to walk to shops, sports, leisure and social facilities, GPs and healthcare facilities.

Given the situation with public transport, people will need to drive; potentially the schools which are further afield will need to provide taxis or buses. The volume of traffic on the roads is likely to increase to an unsustainable level.

What consultations have there been with Highways in this regard?

Another question arising is whether the proposed development will have sufficient car parking spaces for the new residents. What are the proposals in this regard?

Will there be adequate charging points for hybrid/electric vehicles in the new developments?

Access for pedestrians and cyclists

The plan (para. 4.98) envisages access for pedestrians and cyclists from Shoddesden Lane where it meets the A342 in Ludgershall.

At this point, the road goes down a steep hill, there is a sharp bend and a low bridge. There are two houses at the junction, which need vehicular access. The residents and farmers at Great Shoddesden use this road for vehicular access.

How do TVBC propose that access for new residents be limited to pedestrians and cyclists?

This point of access would not be safe for use by the volume of vehicular traffic generated by the two developments on either side of Shoddesden Lane but it would be prejudicial to the existing users to stop their vehicular access.

Will there be a further consultation with the residents of Great Shoddesden and those in the houses at the Ludgershall end?

I ARCHAEOLOGY

Kimpton generally

Between 1966 and 1970 there was extensive excavation at Kalis Corner and a Bronze Age burial site was discovered in Kimpton. This urn cemetery was in use from about 2100 BC until about 600BC; see:-

<https://www.cambridge.org/core/journals/proceedings-of-the-prehistoric-society/article/abs/bronze-age-urn-cemetery-at-kimpton-hampshire/924A6AC594FA1C57F32C3907E3227CC3>

<https://hampshirearchaeology.wordpress.com/2016/01/25/buried-in-time-a-bronze-age-cremation-cemetery-at-kalis-corner-kimpton/>

The archive and finds from Kalis Corner are in the care of the [British Museum](#) (museum no. 1988, 0505). One 'outlier' pot of the same period is in on display in the [Andover Museum](#).

There is further information about extensive findings at:-

https://www.archiuk.com/cgi-bin/archi_new_search_engine.pl?search_location=SU%2026%2047&search_type=archi_town_search&pwd=freesearch@freesearch.com&TownName=Kimpton%20Down%20Farm&county=Hampshire&search_range=10000&font_size=&placename=Kimpton%20Down%20Farm&info2search4=archi_town_search&PlacenameFromPlacenameFinder=Kimpton%20Down%20Farm&CountyFromPlacenameFinder=Hampshire&period=mesolithic&linklaunch=subcategory

In addition, there are multiple Roman sites identified in and around Ludgershall, Kimpton, Redenham and nearby villages; see:-

https://www.archiuk.com/cgi-bin/archi_new_search_engine.pl?search_location=SU%2028%2048&search_type=archi_town_search&pwd=Shoddesden88_24&TownName=LITTLE%20SHODDESDEN&county=Hampshire&search_range=3000&period=&font_size=&placename=Little%20Shoddesden&info2search4=archi_town_search&keywords=#results_listof_archi_sites

Proposed development sites

It is understood that archaeological investigations are a normal part of any development which takes place in an area where archaeological sites have already been identified.

Will TVBC therefore require developers to undertake and report on such investigations? What discussions have there been with Historic England in this regard?

There is a wealth of archaeological information for the area; see the map at:-

https://www.archiuk.com/cgi-bin/0001_test_archi_new_search_engine.pl?search_location=SU2848&XXXX=&search_range=3000&pwd=&SearchType=freesearch&password=Shoddesden88_24&user_search_location=SU2848&distance=3000&map_search=1&keywords=&period=&mobile=

The area is rich in history, from the Bronze Age onwards. These development proposals present an opportunity for further archaeological investigation; what are the proposals in this regard?

In 2020-2021 we met an archaeologist carrying out preliminary excavations to the North West of Little Shoddesden, on the edge of the site of the proposed development to the South East of Ludgershall. Was this a preliminary investigation? What stage has been reached? What further excavations are proposed?

J EMPLOYMENT

Evidence of existing employment and needs

The basis of the Local Plan is forecast from the evidence base of 2020. That was the first full year of the Covid19 pandemic. There were lockdowns, some for extensive periods; only people in essential services went to work; those who could worked from home. No new businesses were started in premises to which employees travelled to work.

This is a very distorted picture, and not one on which there is any compelling reason to rely as an evidence base. Can TVBC explain why 2020 was chosen?

TVBC acknowledge that some areas designated in 2012 plan are not yet developed. Why is that? If there is no existing impetus for these developments, what steps are TVBC taking to link them to the newly proposed developments so that there will be more employment for the influx of new residents?

Has there been a full analysis of the mis-match between the availability of work in South Test Valley and the weighting of development in North Test Valley? The local plan acknowledges that houses are needed in the south of the borough but these are being provided in the very north!

The Office for National Statistics announced March 2024 that the UK economic inactivity rate is 21.8%; there 9.2m people aged 16-64 who are neither in work nor looking for a job. This represents an increase of 700,000 compared to the position pre-pandemic. What is the figure in North Test Valley and in Hampshire as a whole?

Additional Workforce

What will the demographic of the new town(s) be? How many of the new residents will in fact be looking for jobs?

This will depend on the as yet unclear housing mix, taking the 1,500 (or indeed 2,720) houses; what will that be? As to those people who will be looking for jobs, are there sufficient vacancies for them? Will the additional employment locations (Thruxton and Castledown) be ready in time for the influx of so many people potentially looking for work? Will the vacancies match their skills? If not, where will they find jobs?

On the other side of the same coin is the question of whether people will look for a job close to their potential new home before committing to move. On that basis, will TVBC take steps to ensure that there are job vacancies, potentially suitable for the new residents, available from the completion of the proposed developments?

What assessments of these issues are proposed by TVBC as a condition precedent to the new developments?

The Thruxton Airfield A303 proposed additional development will account for very few jobs. The main proposal is for the manufacture of bespoke cars, although there is scope for further development of 'industrial' processes; see below.

Given that there are jobs and a need for workers, who need more houses, in the south, why are most of the houses to be built in the north? Have TVBC identified any suitable sites for development in the south? Why have these not been put forward?

Accidents in the workplace are unfortunately not an unusual occurrence. The Hampshire Air Ambulance is to be moved from Thruxton (north) to Eastleigh (south) because there are more people who need its services in the south and to fly from north to south increases the delay in picking people up in an emergency. We could find the roles reversed! We will find ourselves in the position that the residents of the south were in, with air ambulance delays because their base is in the 'wrong' part of the county!

Is TVBC confident that there will be jobs for all the new residents? Where will those jobs be? If they do not exist now, are there proposals in place to ensure that they will be ready for the influx of potential new employees? It is noted that there are proposals to increase the employment available at Thruxton, both at the Aerodrome/Circuit site and the Business Park; will this be ready in time? If not, there is a risk that the new developments will be dormitory estates for people whose working lives are centred elsewhere, and whose contribution to the local economy might therefore be less than it would be if they worked locally.

It would be interesting to know the mix of population envisaged in the new developments. What proportion will be economically active or seeking local employment? Who are the people who are likely to want to live in the new houses? What proportion will be owner occupied/ affordable housing/ privately rented/ social housing? What measures have TVBC taken to ensure that there will not be a mis-match between the housing, or type of housing to be built and the people who need it?

New Jobs

Paragraph 4.409 identifies a need for ‘advanced manufacturing’ as a growing source of employment. Thruxton Aerodrome is to expand the use of its site (4.122) with expansion to land to the South (4.108) with substantial redevelopment of Thruxton Business Park (4.113) and collaboration between the two (4.115).

How has this need been identified? How many job seekers are there in North Test Valley, who have been unable to find this type of work in South Test Valley or South Hampshire? What proposals exist for the creation of new jobs there, which might give rise to a need for more housing closer than North Test Valley?

Apart from the A303, the access routes to Thruxton Aerodrome are all narrow roads through the villages of Thruxton, Kimpton and Fyfield. What do TVBC think is likely to happen to traffic once this development is completed? What do TVBC propose to do to protect the surrounding villages?

It would be useful to know exactly what activities will be permitted is set out in paragraph 4.116:-

‘Employment uses related to aviation, motorsport, advanced manufacturing, and knowledge-based uses will be supported which includes the following use classes:

E(g)(i) research and development

E(g)(ii) industrial processes

E(g)(iii) general industrial

B(2) storage and distribution

B(8) open storage’

TVBC state that this is all consistent with the Thruxton Made Neighbourhood Plan.

We need a full strategic study of the likely impact of the increased traffic, also of the activities proposed, particularly in relation to noise disturbance which, we know from the motor racing, might affect Kimpton. There might also be industrial pollution, both air and water.

What do TVBC envisage by way of cost (to the environment)/benefit study before implementation of any of these proposals?

What are the proposals for the mitigation of these potential detrimental effects on the environment?

Agriculture

There is still some agricultural activity in the area, and hopefully some agricultural land will survive the impetus to create solar parks, housing and industrial developments. There is, after all, a climate emergency, which the Plan recognises. We are fortunate to have land for carbon capture as well as agriculture and leisure activities.

Sparsholt College offers agricultural and related courses; there are employment opportunities in the sector in North Test Valley.

Employment related to agriculture includes not only those who work on the land, in arable and livestock farming and land management but also requires people to maintain farm buildings and machinery.

The only mention of any significance relating to the sector is in the box on page 83, at (h), echoed elsewhere, and this is a very negative mention.

The reference is to existing agricultural odours and the possible need to mitigate these for the benefit of the new residents. We will be intrigued to learn the outcome in respect of the 'odour assessment' proposed at (h); since 1988 we have lived with what we consider to be normal agricultural odours from time to time. Our farmers are already beleaguered and if they are prohibited from producing odours they may lose their livelihood, and we the benefit of their produce.

K INFRASTRUCTURE & SERVICES

Electricity

Both nationally and locally there has been news of electricity supply shortages and even suggestions that some people use no electricity at certain times.

Problems continue in relation to expanding the supply generally, connecting new supplies, increasing low carbon and sustainable supplies and, of particular concern to the consumer, issues with 'smart' meters. See:-

<https://www.energylivenews.com/latest-news/>

The new town(s) will add to the burden of the existing infrastructure, which may be unable to cope.

Has TVBC engaged with the National Grid, Ofgem or any other industry leaders? If not, what are the proposals in this regard?

Renewables

The new TVBC and Wiltshire developments present an exciting opportunity with the potential for inclusion of renewable energy sources as part of the development at the construction stage.

What proposals are there for the inclusion of renewables (e.g. air source heat pumps, or PV panels, the latter particularly on roofs of public buildings) in the proposed developments? What proposals will be implemented in this regard and in relation to any ancillary developments necessitated by the new developments, for example industrial buildings and shopping 'sheds'?

The combined TVBC/ Wiltshire developments present a one-off opportunity to integrate renewables from the outset.

Gas

There is a gas main to the West of Little Shoddesden, but we have no gas. What proposals exist for the new developments?

Ideally, renewables will take the place of gas, but this will take some time and there may be some demand now. Piped gas is safer than bottled, which many people in the area currently use.

Water

The issues with Southern Water are numerous. They have failed to maintain or repair the infrastructure, with the resulting chaos on some roads due to burst pipes. There is sewage being pumped into the river Test and other local watercourses. In times of heavy rainfall there is flooding and leakage of sewage into the potable water supply. In times of drought there are water shortages.

What engagement has there been with Southern Water to plan for the new town(s)?

Telecoms and broadband

In Little Shoddiesden we have given up trying to get anything approaching an adequate level of service from BT/Openreach. Our speeds ranged from 1-5 Mbps.

During the course of about 100 calls and over 20 engineer visits in 2020-21, when we were of course trying to work from home, we learned that the Ludgershall exchange and the lines from there to us require replacement in order to provide a service fit for the 21st Century.

The equipment is outdated and requires replacement; the line from the exchange to us is only partly fibre, but is wholly compromised by paucity of cabinets and general lack of maintenance. In short, BT/Openreach were not prepared to spend anything on improving the infrastructure and were therefore incapable of supplying a service fit for purpose.

We turned to an alternative supplier, and now use a 4G connection. That is more expensive than BT/Openreach, but correspondingly more reliable. Our speed is now 35-40 Mbps.

Our neighbours have resorted to Elon Musk's satellite service, or to other alternative suppliers.

In Kimpton there was a plan to instal fibre to the premises (FTTP) but after a fire during the installation process, they now have fibre to the cabinet (FTTC) which provides a download speed of up to 70 Mbps.

We understand that Ludgershall still suffers poor connectivity due to the state of the infrastructure.

It is to be hoped that BT/Openreach will be prepared to upgrade their system for the new town(s); will TVBC ensure that this is done? What discussions have TVBC had with BT/Openreach?

Given the acknowledgment that more people work from home, and the encouragement to new employers, this is surely an essential pre-requisite to the construction of the new homes, businesses, schools and all other required facilities.

Waste collection and recycling

We currently have fortnightly general waste and fortnightly recycling collections. Will this be the pattern for the new developments?

What discussions have taken place, or are proposed, with the waste collection companies as to how the services will operate for the new town(s) across the TVBC/Wiltshire border?

As to recycling, there are discrepancies between TVBC and Wiltshire:-

TVBC collect:-

- Paper
- Cardboard

- Plastic bottles only
- Tins and cans
- Aerosols

They will not take:-

- Empty recyclable milk or other cartons
- Plastic food containers, e.g. microwave meal bowls
- Glass bottles or jars
- Batteries

Wiltshire collect:-

- Paper
- Cardboard
- Empty recyclable plastic containers and bottles
- Glass bottles and jars
- Batteries (to be put out separately on top of the bin)

They will not take:-

- Black plastic or any plastic film

TVBC have announced that they will collect food waste from 2024 but we have yet to be offered this service. Wiltshire have announced that they are preparing, and engaging in discussions with Defra, for the collection of food waste by 31 March 2026, as required by the Environment Act 2021

Given that the combined TVBC and Wiltshire developments require liaison between the two main local authorities, it is to be hoped that there will be some harmonisation of waste and recycling collection services.

What are the proposals in this regard?

Fly-tipping

Unfortunately, fly-tipping is now ubiquitous. The likelihood is that this polluting activity will increase incrementally with the developments unless preventive measures are put in place.

Will TVBC and Wiltshire provide convenient domestic waste and recycling depots? Will there be CCTV in place, in and around all the new developments so that fly-tippers might be either deterred or caught and dealt with appropriately?

L HEALTH & SAFETY

Roads and traffic

The question of the new 'main road' passing from Ludgershall/Tidworth through the Wiltshire and TVBC developments to the South of the railway line is discussed under 'Roads and public transport'.

There are several issues arising in relation to the **construction phase**.

What are the traffic management proposals for the construction phase of the bridge/ junction(s) and other A342 access points?

There is a real prospect that a section of the A342 will need to be closed, possibly for some days or weeks, during the construction of the bridge. Similarly, when the new access points for the road passing through the new town(s) (TVBC and Wiltshire) are under construction, road closures are foreseeable.

If traffic is diverted through Kimpton and other villages, this will cause serious risks to the local residents. Not only is there an increased likelihood of accidents and injury, but there will be noise, air and light pollution.

What are the proposals in this regard?

Will the construction workers live on site? If not, how will they be accommodated locally? If there is neither sufficient local accommodation nor a proposed on-site 'village', their daily journeys to the site will cause significant additional traffic.

The position **after completion of construction** also poses a few challenges.

The proposed new road through the TVBC and Wiltshire developments, will, it is assumed, join the A342 at more than one point. The road of itself will pose additional risks to pedestrians, cyclists and residents of the new town(s). What measures are proposed in this regard?

Will there be cycleways through the new town(s)?

With the potential for 2,720 new houses, there could be double that number of additional cars, or even more. Some residents will have motorcycles; others may have vans for work. There will be a need for management of this additional traffic to ensure that the residents of the new town(s) can walk or cycle safely, and that there is safe access to playgrounds, schools and other community facilities.

What are the proposals in this regard?

Railway line

This is an important railway to enable the Army to transport tanks and other heavy vehicles and equipment to and from the Salisbury Plain training area. However, the use of the line is not regular. It is used more frequently when the Army is engaged in operations abroad, but it is also important for the movement of equipment between Tidworth and other Army bases.

There is (for obvious security reasons) no timetable. It is easy to think that the line is very rarely used, and there is great temptation to walk along it.

The railway could be a very attractive place for children and young people, particularly if there are to be no, or insufficient, community facilities. It would be a great temptation for young people to walk or ride off-road bicycles or motorcycles along the railway.

There would be a significant risk of injury or death to anyone using this railway under the misapprehension that it is rarely used, or even disused. We are mindful in this connection of the intention to move the Hampshire Air Ambulance from Thruxton to Southampton.

For that reason we would strongly urge that any development should include high barriers to prevent pedestrian access and so far as possible to avoid the risk of injury or death to the unwary, and unauthorised user. We would expect the Ministry of Defence to express a similar view. We would be interested to know what consultations have taken place in this regard.

Noise pollution

During the construction phase there is likely to be significant noise, both from the vehicles going to and from the development, and from the site itself.

What noise restrictions and operating times? Will TVBC ensure that the sites are managed in accordance with the Considerate Constructors' Scheme (CCS)? See:-

<https://www.ccscheme.org.uk/>

After completion of the development, the influx of population and the activities generated by the new residents will of themselves generate some noise. There will be considerably more traffic noise; even with electric vehicles the tyre noise will be an issue. What mitigation measures are proposed?

What proposals are there to provide the necessary additional resources within TVBC's Environmental Health Office, to ensure that there is effective monitoring and control of potential noise pollution both in and from the new town(s)?

There are also similar considerations in relation to the new industrial activities proposed at Thruxton, and the same question applies.

Air pollution

The Plan at page 83 (h) asserts the need to manage agricultural odours for new residents. We are in the countryside; we need agriculture! Are TVBC concerned about 'natural' odours but not those from new industrial activities at Thruxton (and additional traffic from all the proposed developments)?

There is probably greater risk from the additional industrial activities, both in Thruxton and Castledown, than from the residential developments.

Will TVBC and Wiltshire engage to control and monitor these activities?

Again, what are the proposals to ensure that there are sufficient resources available to do this?

Light pollution

During the construction phase, given that the project is likely to take many months (or years) any developer will need to maximise working time (subject to the CCS mentioned above). This will, in the winter months, involve working under strong lights.

The detrimental effect of this on the natural environment is clear. There will also, however, be the 'glow' in the night sky. Currently, it is very dark here in Little Shoddiesden at night. While we may have to tolerate a short period of light pollution, during construction, consideration ought to be given to the longer term.

What proposals are there in relation to the lighting of the new town(s) when they are completed, in order to minimise light pollution while ensuring a minimum level of safe lighting for residents?

There will also be additional light pollution from all the new residents' vehicles.

Water pollution and biosecurity

During the construction phase, there will be hundreds of people working on the site(s). Will there be a caravan/ Portakabin 'town' for the construction workers? Where will their water come from, and where will their waste go?

After completion, there will be waste water considerations; these are discussed elsewhere, under the heading 'Flooding and biosecurity'.

(III) CONCLUSION

There is considerable scope for enrichment and enhancement of the local communities through the proposed developments.

However, for the successful implementation of the Plan, I think that further detailed holistic examination of all aspects outlined above is essential before the commencement of construction, or indeed the granting of planning consent.

There is a delicate balance between the potential and reality of past experience.

It is in my opinion vital that there should be Section 106 agreements where appropriate, and these will all need to be monitored and enforced by TVBC. Where 'partners' or others agree to put in place any necessary supporting facilities (e.g. policing, leisure facilities) TVBC should enter into and enforce agreements with them to ensure that they are in place ready for the influx of an additional, potentially 8-11,000 people.

With such careful management, this Plan should be capable of successful implementation.

Claire Bailey



March 2024

From: [REDACTED]
To: [Planning Policy](#)
Subject: Comments on Local Plan 2029-40: Ref 10779
Date: 05 April 2024 10:58:27
Attachments: [TVBC reject Thruxton planning application 26.03.24.docx](#)

Caution: This email originated from outside of the organisation. Do not click links or open attachments unless you recognise the sender and know the content is safe.

Dear Sirs,

I am aware that the time for submission of comments has now expired. Nonetheless, I trust that you will take into account the decision made by your planning committee on 26 March in relation to the proposed development by Orchard Homes of 14 houses on agricultural land in Thruxton. It is reported in the Andover Advertiser (but not yet available on your planning portal, so far as I can ascertain) that the application was refused for the third time, highlighting a number of matters to which I referred in my comments, in particular:-

- the urbanising effect on the open countryside, with an adverse impact on its rural landscape and character
- the fact that the development would have an overbearing impact on neighbouring properties
- unsafe or insufficient road access
- lack of infrastructure
- absence of facilities and amenities to support either the existing or increased population

I am pleased to note that your department recognises the need to address the fundamental prerequisites for sustainable and successful development, so as to ensure that everything necessary is either in place or supported by enforceable Section 106 agreements.

Yours truly,

Claire Bailey