

Thrupton Parish Council has a number of comments and suggestions regarding the 2040 draft plan.

## Policy HOU3:Rural Exception Affordable Housing

*(Development for rural affordable housing will be permitted provided that:*

*a) The proposal is accompanied by evidence which demonstrates that there is an unmet need within the parish for accommodation by households unable to afford open market housing where a member of each household has either:*

*i. been ordinarily resident in the parish or previously lived in the parish and has a strong family connection; or*

*ii. a demonstrable need by virtue of their employment to live in the village or its immediate surroundings; or*

*iii. a demonstrable need to live within the village either to support or be supported by a family member.*

*b) it is restricted in perpetuity to occupation by households with a member in housing need;*

*c) the proposed mix of housing meets the identified need;*

*d) an assessment of deliverable sites within the parish has been undertaken and informed the selection of the proposed site; and*

*e) where a proposal also includes open market housing to enable deliverability, that this is on the same site and demonstrated as being limited to the necessary maximum proportion of market housing in order to achieve viability, and is in proportion to the size of the development.*

*Affordable housing should be the predominate tenure in any event.)*

In relation to new affordable housing, NPPF Annex 2 defines Affordable Housing as at least 20% lower than market rent/ market purchase level. Where schemes are brought forward as rural exception affordable housing provision this percentage is to be set at a level that ensures true affordability and must be demonstrated in development proposals as an achievable commitment. Social housing provision for lower income households should be included, at a maximum 50% of market levels within affordable housing schemes in rural areas.

Our experience is that this exception has acted as a loophole which some developers seek to exploit, rather than as intended to encourage affordable homes for local low paid workers in rural areas. We have seen developers concoct local needs by taking or combining multiple sources from surrounding areas, not local needs. Most applications in recent years in our parish have sought to exploit this exception.

We suggest the following addition to planning criteria - If a parish/TVBC has undertaken a formal local housing needs survey in the previous 5 years, this will be the primary source for determining need.

We suggest to discourage large speculative attempts at development and to keep rural areas as rural, the exception should be limited to a maximum of 4 dwellings within a 3km radius

To discourage building houses that can easily be adapted to more expensive housing, defeating the original objectives, we suggest strict limits on total rooms/size/square footage for this exception.

## Northern Area Policy 9 (NA9): South of Thruxton Aerodrome

*(A strategic employment allocation of approximately 15 hectares is proposed at South of Thruxton Aerodrome. Development will need to achieve a positive relationship with the Thruxton Aerodrome site. Development will be permitted subject to:*

- a) The use comprises a business activity which is related to either aviation, or to motor sport or the motor industry, and/or has a connection to use or operation of the airfield, or motor racing circuit;*
- b) Where ancillary non-employment uses are proposed, these will primarily support onsite businesses and their employees;*
- c) A sequential approach will be taken within the site to direct development to areas at lowest risk of flooding taking into account flood risk from all sources including surface water flooding;*
- d) Access via existing business park at Aerodrome Road;)*

We suggest the policy should add a condition that modification to the A303 junction adjacent to Aerodrome Rd is both mandatory and work completed prior to any planning application for development being approved. The current lack of an eastbound exit from the A303 and westbound entry to the A303 would mean additional local traffic from new developments. During both the building of and operation, additional heavy vehicle traffic would adversely affect local residents particularly on rural Thruxton Down Rd.

- This road is unsuitable for a large volume of heavy commercial vehicle traffic. It has 11 residential properties plus farms, small businesses and a riding school with horses using the road on a daily basis.
- There are a further 20 plus properties that access onto the road to the west past the top underpass.
- There is already a large amount of heavy vehicle traffic using Thruxton Down Rd. These include from industrial sites at Grateley, army tank transporters from Tidworth that prefer driving along Thruxton Down rather than joining the A303 at the A338 junction as well as traffic from the west accessing the current industrial estate.

- The S bend at the top of the road has seen at least 5 road fatalities , the latest in August 2023.

We suggest an additional item to the policy along the following lines

e) A mandatory precursor to any development of the site must be modification to the A303 junction to allow entrance and exits in both directions. Priority consideration will be given to the following

- minimising conflicts of local and site traffic.
- Changing Thruxton Down Rd to have “access only” status , speed limits and/or traffic calming measures.
- Closing the road from the village to the industrial site to all vehicular traffic so it may be used solely by cyclists and walkers.

The Thruxton Local Plan identifies Thruxton Down as a dark skies area and as with the identified housing developments near Ludgershall (NA7/NA8) the proposed site is close to the Salisbury Plain Special Protection Area (SPA) (see 4.91 in the draft plan) . We recommend adding to the policy something along the lines

f) The site is close to Salisbury Plain Special Protection Area (SPA) and is within the buffer zone. Appropriate mitigation will be required to protect dark skies.

## Northern Area Policy 7 (NA7): Land to the East of Ludgershall

## Northern Area Policy 8 (NA8): Land to the South East of Ludgershall

We strongly recommend that TVBC include in the plan information from adjoining Wiltshire councils regarding their housing developments under consideration in the vicinity. Apart from the need for transparency, the combined size of proposed housing developments will impact all ancillary decisions including infrastructure , noise, dark skies and protected landscapes (Salisbury plain and North Wessex Downs).

Our local knowledge is that the majority of traffic from the new housing will be in the direction of Andover and Basingstoke where the majority of employment opportunities are likely to exist. The importance of road planning to ensure avoidance of bottlenecks and rat runs will be key to the success of such developments. Separate paragraphs are needed on this in addition to the site access points. The proposed development at Manor Farm will likewise impact traffic flows into Andover from the north so a joined up highways approach is needed across the Ludgershall, Wiltshire and Manor Farm developments.

Local services such as schools , dentists, doctors and hospitals will likely be needed in or close to Ludgershall which being on the Wiltshire border will necessitate cross county collaboration. We suggest this needs to be explicitly stated in the plan and agreed with Wiltshire. Adequate services are fundamental to the success of new developments and quality of life for residents in the area. It is incumbent upon the council to ensure services are in place **prior** to any developments. Experience from elsewhere has seen developers going into administration or dragging their feet over ensuring such services are provided. We suggest the plan includes the stated intention to issue 106 agreements and/or Community Infrastructure Levies to mandate contributions to new facilities.

## Northern Area Policy 3 (NA3): Andover Town Centre Uses

There is a significant residential opportunity in zone A, the town centre, on the upper floors of all buildings. This could be a key element in the revival of the town centre which has become increasingly run down in recent years. We understand the recently announced levelling up funds for the town centre would be linked but wish to state that mixed dwellings need to form part of any development to be successful. The dwellings would have excellent access to facilities and transport. Well thought out residential developments that encourage, for example, residents who are commuters utilising the nearby railway station, can help transform town centres and reduce anti-social behaviours. Developers may prefer green field sites but it is incumbent on planning to push for development that benefits the town centre and communities in the long term. We recommend this is added as a key component for town centre uses and merits its own housing policy as part of strategic housing allocations.

## Policy CL5: Renewable and Low Carbon Energy

The use of housing and commercial property roofs for solar panels as part of this policy should be preferable to large installations covering our agricultural landscapes. TVBC could be open to the accusation of pandering to large renewable energy corporations rather than the local population and small businesses. We suggest using roofs is included as a **preferred** option for renewable energy.

### **Policy ENV3: Landscape Character**

To strengthen this policy we suggest adding “vistas” to item C

*c) it does not result in the loss of, or detrimental impact to, important local landscape **vistas and** features such as trees, walls, hedges, green spaces or water Courses;*

## Farming

There is only one reference to farming in the document relating to water use. We propose a policy is added dedicated to the aim of TVBCs important role in protecting and promoting this vital industry. We are a largely rural borough and it should be incumbent on local councils to aid our farmers wherever possible with local experience shaping central government policies and implementation. Farmers are key employers in the Test Valley but are increasingly under threat from red tape, cheap foreign imports and ill thought out Net Zero policies affecting the viability of farms and local employment. For example the claims made on the carbon impact of livestock which is driving reduction in livestock in the UK, utilise global figures not local ones which are much lower given our local climate and agriculture. A very informative and balanced case is presented by a farmer that points to misleading use of data driving some government policies. You can see the youtube video under the name Harrys Farm with the video called "UK Farmers are under attack ...".

We suggest that there is interaction with farming groups to put a TVBC policy in the plan in support of rural businesses and employment. Mention should be considered in the policy on biodiversity (B101) where farmers play an important part. The Environment Agency may have primary responsibility but Borough councils have a local responsibility for our farmers.

## Hospitals

There is no mention of hospital services in the plan. North West Hampshire is already poorly served by NHS hospitals with A&E services requiring travel to Salisbury, Winchester or Basingstoke. No developments should be undertaken without solid plans for increased hospital services in the area. We suggest a section needs to be added on hospital services. Reinstating A&E services and extending Andover hospital is an obvious consideration for the north area. We suggest the plan includes the stated intention to issue 106 agreements and/or Community Infrastructure Levies to mandate contributions to new facilities for the large residential developments.

## Ensuring When new housing is built, can communities get the infrastructure to go with it?

(source House of Commons Library - Insight Published Friday, 22 February, 2019. [When new housing is built. can communities get the infrastructure to go with it? \(parliament.uk\)](https://www.parliament.uk/resources/insight/when-new-housing-is-built-can-communities-get-the-infrastructure-to-go-with-it/) )

The routes through which local planning authorities (LPAs) can seek contributions from developers are known as Section 106 agreements (also known as planning obligations) and the Community Infrastructure Levy (CIL).

Critics of the system tend to argue that:

- It is not working effectively and lacks transparency.
- LPAs could make better use of their powers, and so raise more funds, and service providers could be more active in securing some of those funds. The NHS Improvement website (for example), remarks that “many trusts have not been active in engaging with their local council to secure [these] funds.”
- CIL is too complicated and has failed to raise as much money as expected.
- The pooling restrictions are unhelpful.

Albeit that the report is 5 years old, we believe these are still valid concerns. We suggest TVBC directly address these issues in the plan to do the utmost to ensure successful new residential developments and learning lessons from elsewhere.

## Document Formatting

Formatting the document in two columns is not helpful for reading the document electronically as it requires continual scrolling. To avoid printed copies as far as possible a single column formatted version for online reading is suggested.